



PEFC - Promoting Sustainable Forest Management

PEFC Council

2ème étage, 17 rue des Girondins, L-1626 Luxembourg

Telephone +352 26 25 90 59 Facsimile +352 26 25 92 58

E-mail pefc@pt.lu Web www.pefc.org

OPEN LETTER

Mr David Cassells &
Mr Bruce Cabarle
Co-chairs
World Bank / WWF Alliance
The World Bank
1818 H Street, N.W
Washington, DC 20433
U.S.A

5th July 2004

Programme for the Endorsement of Forest Certification schemes (PEFC) participation in testing of QACC (Questionnaire for Assessing the Comprehensiveness of Certification Schemes/Systems)

Dear Messrs Cassells and Cabarle

The PEFC Council welcomes the opportunity to work together with the World Bank and WWF on the expansion of sustainable forest management around the globe and the certification thereof. The PEFC Council therefore appreciates the kind invitation by the World Bank/WWF Alliance to participate in a project to achieve these aims.

The PEFC Council notes, with regret, that the QACC was developed internally by WWF and the World Bank with no external multi-stakeholder participation or consultation. It is unfortunate that the two advocates (World Bank and WWF) of broad participation (including in the QACC requirements themselves) have not respected this valuable principle in the preparation of the QACC.

An initial analysis of the QACC demonstrates that the document has been drafted with a strong bias towards one international certification system. This bias is obvious both in the structural elements and in the use of specific terms. The document requires that schemes and systems should be free from conflict of interest. It therefore follows that the assessment of schemes based on the QACC should also be free from conflicts of interest, which are currently present. The PEFC Council therefore rejects the QACC in its current form.

If the World Bank/WWF Alliance wants to improve the questionnaire to compare different forest certification schemes, the PEFC is willing, and has the capacity, to assist in the development of a suitable document prior to any field-testing and we would welcome working collaboratively with you to achieve this goal. The PEFC Council, its member schemes and all their stakeholders have a considerable wealth of knowledge and experience in the development of numerous credible independent national forest certification schemes around the world. In addition, through its membership of the International Accreditation Forum, the PEFC Council is in an ideal position to call upon all the technical and normalisation expertise required to ensure that a credible mechanism can be developed, and

field-tested. The assessment of the comprehensiveness of certification schemes for the World Bank's purposes can thus be assured.

The PEFC Council therefore invites you both to meet with the Executive of PEFC Council at your earliest convenience to discuss how to achieve our collective goals to promote sustainable forest management and the certification thereof.

We look forward to working with the World Bank/WWF Alliance in an open and transparent and inclusive process in which all stakeholders can have confidence.

Yours sincerely

Ben Gunneberg
PEFC Council Secretary of behalf of the PEFC Council Executive