



INDONESIAN FORESTRY CERTIFICATION COOPERATION
KERJASAMA SERTIFIKASI KEHUTANAN INDONESIA

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To Whom It May Concern

The Indonesian Forest Certification Cooperation (IFCC) notes the recent enquiries from stakeholders concerning the IFCC standard robustness. IFCC believes in transparency and in upholding the rigorous standard in forest management, and we welcome our stakeholder's inquiry and request for further information concerning the assessment process.

IFCC ensures the quality of the audit by engaging only with Certification Bodies (CB) that are accredited by an Accreditation Body (AB) that is a member of IAF (International Accreditation Forum). The AB also undertake an annual audit to the CBs, through random sampling of audit results by the CBs, in order to ensure that the IFCC standard is being upheld and observed.

We believe that all the actions and conclusion that the CBs have taken during the audit process is strictly in accordance to the IFCC Standard ST 1002:2013 on Requirements for Bodies Providing Audit and Certification of Sustainable Forest Management, which in itself refers to the ISO/IEC 17021:2011.

With regards to the lack of detailed information included in the public summary provided by the CB, referring to IFCC Standard ST 1002:2013 clause 8.4, the public summary is meant to provide an overview of the certified FMU and its audit result. Data sensitivity and the non-disclosure nature of such audit requires that the details, which are explained thoroughly in the main audit report, are accessible only to IFCC, the CB, the Forest Management Unit (FMU), the AB and parties involved in formal cases involving the FMU.

IFCC believes that the standard we have developed is amongst the most robust in the world. The points of concern raised by some stakeholders have actually been covered in IFCC standards – for example the issue on forest fire is addressed in Clause 8.4 under the Ecological Aspects of IFCC ST 1001:2013, while the issue on peat subsidence is addressed in Clause 1.15 point c under Chapter I (General Requirements) and Clause 6.5 under the Ecological Aspects of IFCC ST 1001:2013. Further, addressing stakeholders' concern on conversion of natural forest for plantation forest, in the IFCC Standard on Sustainable Forest Management (IFCC ST 1001:2013), under the Specific Requirements for Management on Plantation Forest (Section III), IFCC has set forth several important safeguards in certifying FMU that still convert from natural forest after the cut off date of 31 December 2010.

An FMU can still be certified under IFCC-PEFC Standards if the converted area after the 2011 cut off date meet the following circumstances : (a) conversion is in compliance with national legislation and land use planning and is permitted by relevant authorities; (b) conversion is necessary for building forest-related infrastructure or for livelihood and welfare of local communities and provides long term contribution to social, economic and environmental benefits; (c) the conversion does not occur in protected areas, environmentally and socially important biotops; and (d) the total area of the converted forest within the FMU represent less than 5% of the total forest area of the FMU.

It needs to be noted that ultimately, IFCC's goal is to engage and encourage as many forestry industry players as possible into adopting and implementing the sustainable forest management practices. The cut-off date exists to provide a boundary on areas eligible to be certified, not to alienate the management units from the IFCC certification entirely. As long as the management unit has met and satisfied our requirements on the time of certification, our accredited CBs are able to certify the area eligible for certification, provided also that the conditions on area converted after the cut off date of 31 December 2010 are met.

The customers shall not be worry on the segregation of certified pulpwood from the non-certified pulpwood as PEFC Chain of Custody certification considers timber from forest conversion to be controversial sources and prohibited from entering a certified product. Compliance with this requirement must be demonstrated in conformity assessment.

IFCC is committed to contribute and work together with various stakeholders in ensuring that sustainable forest management practices are being upheld and implemented in Indonesia's forestry industry. To that end, we thank stakeholders for the opportunity to clarify on the strict rules of IFCC standard, and we look forward to continuous constructive feedbacks to improve the IFCC standards in order to promote the sustainable forest management in Indonesia.

Bogor, March 2016

Indonesian Forestry Certification Cooperation (IFCC)