



Synopsis of consultation comments on FSC's Approach to Placing and Valuing Pre- Consumer Reclaimed Paper Fibre within certified Paper Products (Discussion Paper FSC-DIS-40-008)



Bonn, 08 May 2014.

Synopsis of consultation comments on FSC's Approach to Placing and Valuing Pre-Consumer Reclaimed Paper Fibre within certified Paper Products (Discussion Paper FSC-DIS-40-008)

Consultation period

English and Spanish: 25th September – 15th January 2014

Contact for comments: Dorothee Jung (d.jung@fsc.org)

This document has been prepared in accordance with Clause 5.12 of FSC-PRO-01-001 (V 3-0)¹, and contains an analysis of the range of Stakeholder groups who submitted comments, as well as a summary of the issues raised (in relation to the requirements), a general response to the comments and an indication as to how the issues raised were addressed.

Contents:

1. Range of stakeholder consultation participants
 2. General comments
 3. Comment summary
- Annex 1: Public Consultation Participants

1. Range of stakeholder consultation participants

Overall 67 stakeholders provided feedback on the consulted discussion paper. 29 stakeholders participated in the FSC membership survey and 38 submitted their comments using the comment form. 31 of the total 67 respondents are FSC members, mainly representing the environmental and economic chamber. Only one social chamber member participated in the FSC membership survey.

FSC Membership responses

	Social Chamber	Environmental Chamber	Economic Chamber	Total
South	0	3	4	7
North	1	11	12	24
Total	1 (3%)	14 (45%)	16 (52%)	31

Of the 67 consultation respondents, 28 are certificate holders (CHs), 6 are representing industry associations, 24 are environmental stakeholders/ NGOs, 3 are certification bodies (CBs), 3 are consultants, 2 are representing FSC National Offices and 1 a governmental organization. All respondents provided their feedback in English, although the full documentation including the survey was also published in Spanish.

¹ FSC-PRO-01-001 V 3-0 The Development and Revision of FSC Normative Documents.



2. General comments

The response to the discussion paper was largely positive, with 68% of the survey respondents agreeing with the content of the discussion paper, arguing that the study is comprehensive and presenting a balanced impact assessment as requested by the General Assembly Motion 38².

32% of the survey respondents stated that they do not agree with contents of the discussion paper. Most of this disagreement relates to the final recommendation included in the discussion paper (see below), not to the research and analysis as such.

Concerning the research it was noted that the discussion paper does not provide many examples from developing countries. In the joint statement from the International Environmental Paper Network Working Group, representing 15 ENGOs, it is argued that the study does not reflect that there is a need to identify post-consumer contents outside of North America, like in Europe (referring to Belgium where a public procurement policy exists and to a law case in Germany) and Asia. Stimulating collection of post-consumer paper and identification of post-consumer paper contents is said to be needed in countries like India, where segregation is taking place but the average collection rate is still rather low.

3. Comment summary

Options for valuing pre-consumer paper materials

The discussion paper provides 5 different options for best valuing reclaimed paper materials in the FSC system. Based on an analysis of the discussion paper findings, FSC included a recommendation in the draft for consultation, to give pre-consumer paper fiber full value and make identification of post-consumer content optional (scenario D).

The results can be grouped into 3 different categories, where 9.5% of the respondents recommend FSC to maintain the current approach (Scenario A), 4.8% of the respondents recommend FSC to give pre-consumer fiber a better value (Scenarios B and C) and 85.7% recommend FSC to give pre-consumer paper fiber full value (Scenarios D and E), supporting the analysis and arguments provided in the discussion paper, but have diverging opinions whether identification of post-consumer content should be optional or mandatory at least in the US and Canada (and encouraged to be voluntarily identified at a global level).

46% of stakeholders (31 in total numbers, mainly CHs and Industry Associations) prefer that identification of post-consumer content is optional (scenario D) and 39.7% of respondents (27 in total numbers, including the 15 ENGOs mentioned above,) request to make identification of post-consumer and total recycled content mandatory in the US and Canada. Most of those favouring scenario E also request modification of the option, suggesting that CHs should identify post-consumer and total recycled content at a global level. One stakeholder proposed to consider making identification of post-consumer content mandatory world-wide. The 9.5% of consultation participants preferring to maintain the current approach represent ENGOs, a CH, a CB and a FSC National Office (6 in total numbers). The charts below illustrate, that the feedback of the FSC membership on the options is very similar to the results considering the total number of respondents.

² The Motion 38 mandated FSC International Center to conduct a chamber balanced study to evaluate the risks and benefits of valuing pre-consumer reclaimed paper fibre materials as FSC certified content. The discussion paper presents the draft results of the study.



Chart 1: Total stakeholder feedback on options

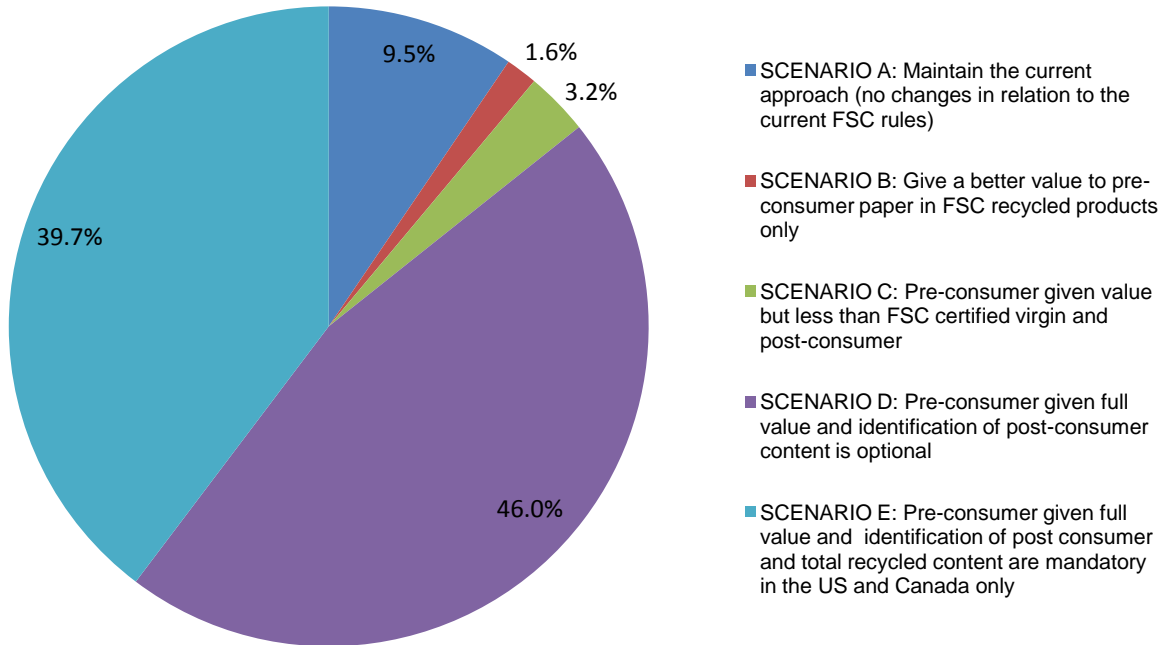
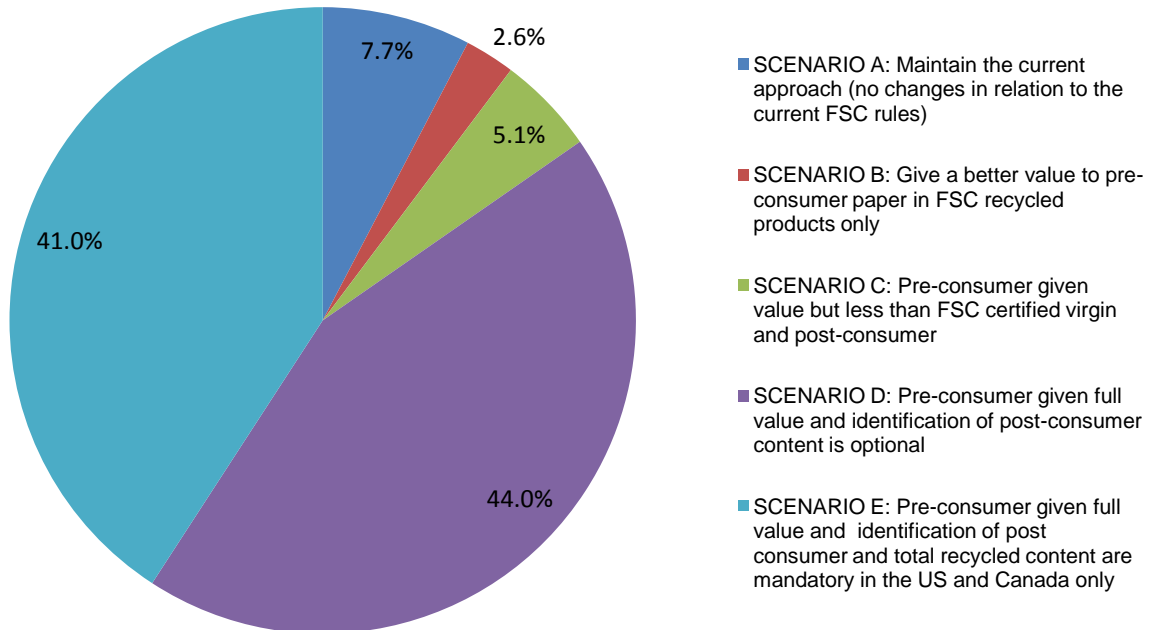


Chart 2: FSC membership feedback on options



Those stakeholders opposed to giving pre-consumer paper fiber full value argue that it may have negative impact on the demand for certified fiber, as in countries like Japan with high percentages of recycled paper in the paper market it would be relatively easy to source pre-consumer material as compared to certified virgin material.



Another statement made is that FSC should focus on its mission, to encourage responsible forest management world-wide, not further expand the value of reclaimed material within the FSC system. Accepting pre-consumer paper fiber would lead to a higher visibility of the FSC Recycled label and leading to confusion among consumers about what FSC stands for.

For most of the consultation participants maintaining the current rules (Scenario A) is not the preferred option, arguing that FSC would neglect the positive environmental impact that the inclusion of pre-consumer paper fiber could bring.

Giving pre-consumer paper fiber a better value (but not full value) as suggested in Scenario B and C is not supported by most of the consultation participants as is said to increase complexity, cost and bring confusion to the FSC system.

Stakeholders opposed to the proposal of requiring the post-consumer identification in the US and Canada only (Scenario E) argue, that FSC as a global system should not create different requirements for specific countries, but keep one global Chain of Custody standard. It is argued that scenario E adds unnecessary complexity.

Additional safeguards

Many stakeholder participants do not see the need to introduce additional safeguards. Three stakeholders suggested that the standard for use of reclaimed material (FSC-STD-40-007) and/ or the accreditation requirements should be strengthened to ensure that controversial sources are not entering FSC products via use of pre-consumer inputs, in case pre-consumer paper fiber is given full value.

Stakeholders also recommended to create a method for encouraging identification of the percentage of post-consumer content in FSC-certified recycled content papers beyond North America, to improve collection systems e.g. in India and China.

Other suggestions

Individual stakeholders provided the following other suggestions:

- FSC should analyse (e.g. by forming a task force or Working Group) in which countries public procurement policies or the law request knowledge of post-consumer content outside North America, before adopting Option E.
- To consider the logical next discussion of pre- and post-consumer reclaimed solid wood. However, one stakeholder explicitly expressed not to be in favour of giving solid wood pre-consumer material the same value as post-consumer.
- To stop certifying recycled material altogether.
- To create a new label consisting of pre-consumer, post-consumer and certified inputs, where the percentage of post-consumer material is labelled, and to disallow recycled inputs under the FSC Mix label or to allow them, but not as creditable input to the label calculation.



Annex 1: Public Consultation Participants

Organization	Name	Stakeholder Type	FSC member
Advanced Certification Solutions	Wolfram Pinker	Consultant	Yes (Econ-N)
American Forest & Paper Association	Catherine Foley	Industry association	No
American Eagle Paper Mills	Michael Grimm	Certificate Holder	No
ARA e.V.*	Monika Nolle	ENGO	No
Austropapier	Hans Grieshofer	Industry association	No
Boise Paper	Mary Perala	Certificate Holder	No
Buy Responsible* Foundation	Maria Huma	ENGO	No
Canopy*	Tara Sawatsky	ENGO	No
Cascades	Véronique Blosseville	Certificate Holder	Yes (Econ-N)
Clinch Coalition*	Paul Mocerri	ENGO	No
Confederation of European Paper Industries (CEPI)	Ulrich Leberle	Industry association	No
Conservatree*	Susan Kinsella	Consultant	No
Dogwood Alliance*	Andrew Goldberg	ENGO	Yes (Env-N)
Dovetail Partners	Jeffrey Howe	ENGO	Yes (Env-N)
Duluth Mill New Page Wisconsin Systems Inc.	John Bastian	Certificate Holder	No
Environment East Gippsland	Jill Redwood	ENGO	Yes (Env-N)
Finnish Forest Industries Federation	Karoliina Niemi	Industry association	No
Forestal Oriental	Andrew Heald	Certificate Holder	Yes (Econ-S)
FSC Japan	Emika Kohno	National Office	No
FSC US	Lori Knosalla	National Office	No
FutureMark Alsip	Glen Johnson	Certificate Holder	Yes (Econ-N)
Global Alliance for Incinerator Alternatives*	Monica Wilson	ENGO	No
Green America*	Larry Giammo / Frank Locantore	ENGO	No
Greenpeace	Judy Rodrigues	ENGO	Yes (Env-N)
Green Press Initiative*	Todd Pollak	ENGO	No
Grünwald Papier	Andreas Hacke	Certificate Holder	No
HAVI Global Solutions	Jessica Farrar	Certificate Holder	No
Heartwood*	Becky Woodaman	ENGO	No
Imaflora	Bartira Mileo Amado (CoC Team)	Certification Body	No
Individual	Ray Huang	Individual FSC member	Yes (Econ-S)
International Council of Forest and Paper Associations	Donna Harman	Network of Industry associations	No
International Paper	Steve Tomlin	Certificate Holder	Yes (Econ-N)
ITC Limited	P.N. Sridharr	Certificate Holder	No
JELD-WEN	Cheryl Carbone	Certificate Holder	No
KapStone Kraft Paper Cor-	Eric W. Smith	Certificate Holder	No



poration			
Kimberly-Clark Corporation	Edward Krasny	Certificate Holder	Yes (Econ-N)
MixedWood	Daniel Simonds	Certificate Holder	No
Mondi South Africa Division	Gladys Naylor	Certificate Holder	Yes (Econ-S)
Natural Resources Defense Council*	Darby Hoover	ENGO	Yes (Env-N)
Natural Wildlife Federation*	Laura Hickey	ENGO	No
NewPage Corporation	Gardy Mouw	Certificate Holder	Yes (Econ-N)
North East Forest Alliance	Susie Russell	ENGO	Yes (Env-N)
Oji Green Resources Co	Chiaki Horie	Certificate Holder	No
Papierfabrik August Koehler SE	Christian Schäuble	Certificate Holder	No
Pfleiderer Teisnach GmbH & Co KG	Dieter Schürmann	Certificate Holder	No
Rainforest Action Network*	Lindsey Allen	ENGO	Yes (Env-N)
Rainforest Alliance	Gweneth Langdon	Certification Body	Yes (Econ-N)
Renewable Strategies	Doug Patterson	Consultant	Yes (Econ-N)
Resolute Forest Products	Guy Tremblay	Certificate Holder	Yes (Econ-N)
SCS	Vanessa Ellis	Certification Body	Yes (Econ-N)
Sonoco	Laura Rowell	Certificate Holder	Yes (Econ-N)
Starbucks Coffee Co	Susan Long / Jim Hanna	Retailer	No
Sustainable Northwest	Paul Vanderford	NGO	Yes (Soc-N)
Tetra Pak	Lena Dahl	Certificate Holder	Yes (Econ-N)
UPM	Sami Lundgren	Certificate Holder	No
Upstream*	Matt Prindiville	ENGO	No
Verband deutscher Papierfabriken	Reinhardt Thiel	Industry association	No
Verso Paper Corp.	Craig Liska	Certificate Holder	No
Wisconsin Department of Natural Resources	Mark Heyde	Governmental organization	No
WWF Belgium	Sabien Leemans	ENGO	Yes (Env-N)
WWF International*	Emmanuelle Neyroumande	ENGO	Yes (Env-N)
WWF Netherlands	Jaap van der Waarde	ENGO	Yes (Env-N)
WWF South Africa	David Lindley	ENGO	Yes (Env-S)
WWF Switzerland	Simone Stammbach	ENGO	Yes (Env-N)
WWF USA	Kerry Cesareo	ENGO	Yes (Env-N)

*Group of NGO's stakeholders providing a joint statement