

Answer to public consultation

**Public consultation of proposal for a list of prohibited species in Nordic
Ecolabelling's criteria**

April 25th, 2019

Forests of the World (FoW) hereby respond to the public consultation on your proposal for criteria for a list of prohibited tree species in products with the Nordic Swan Ecolabel.

FoW share the concern of Nordic Ecolabelling with conservation of tropical rainforests and biodiversity and support requirements that ensure the conservation of IFL's, rainforests and biodiversity. We recognize the challenges that the forestry sector in tropical countries faces and we are keen to work with any organization that supports our efforts to make the forestry sector more sustainable. However we would like to express our strong concern that the proposed list of prohibited species will not contribute to reaching our joint goals, on the contrary it will make sustainable forest management less economically feasible and increase pressure to convert tropical forests, including the remaining IFL's to other land uses.

Through the list of prohibited species, Nordic Swan chooses to exclude most tropical timber species used in Europe, irrespective of specific origin, specific conservation risk and population dynamics of the individual species (most tropical species are NOT threatened by forest management but they are certainly threatened by shrinking suitable habitat and fragmentation due to conversion) and forest management practices. A general ban on tropical timber leads to reduced export possibilities to markets with high sustainability standards. This again reduces the profitability of sustainable forest management and will in countries with poor governance and low level of legal compliance (i.e. almost all tropical countries) lead to an accelerated conversion of natural forests to other purposes, being oil palm/eucalyptus/pine monoculture or industrial/subsistence farming.

FoW thus strongly recommend to revisit the list of prohibited species and ask for expert advice about the specific threats to each INDIVIDUAL species according to CITES and IUCN, and based on that evaluate if sustainable forest management, e.g. certified according to FSC standards for good forest management, is considered a threat to the species. E.g. if the species is on the CITES/IUCN list due to illegal logging and/or non-sustainable harvest levels, then the species should clearly not be accepted, on the other hand, if a species is widely distributed and not in danger of extinction but only on the IUCN list because other factors than forest management is causing a general decline in habitat, but not to an extent that puts the species anywhere near extinction, the species should clearly be allowed providing legality and high standards for forest management (e.g. FSC certified).

In summary, FoW consider that serious efforts are made by certified forest management operations, private, public and community owned alike, to comply with the standards that consider and implement conservation considerations outlined by CITES and IUCN.

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The current list of prohibited species includes all major species harvested in the tropical zones around the world irrespective of the individual conservation issues for each species. The insertion of all these species in the list of prohibited species by Nordic Swan Ecolabelling in effect amounts to an unjustified full ban on tropical timber which is not based on thorough objective scientific criteria.

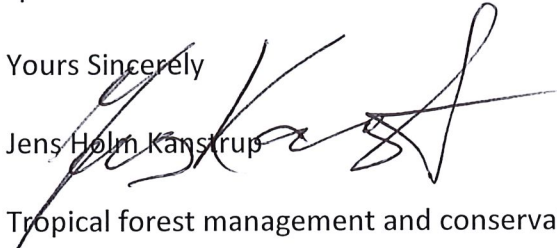
This will in effect undermine many years of work and investment in the implementation of more sustainable forest management practices, e.g. indigenous and traditional communities following the highest standards for good forest management ever developed, and paying the cost of evaluations out of their limited income, expecting an advantage in the international market. The alternative to that scenario is not improved conservation of the forests they manage, but rather increased deforestation and degradation as the owners look for other possible income from the area they own.

We do share the concern of the Nordic Swan with regards to the management of IFL's and the need to ensure that these areas remain intact. Currently the FSC, as the only international certification provider, is working to integrate the IFL concept and translate it to the national context in all countries with national standards and in the International Generic Indicators ensuring global application.

We understand that Nordic Swan initially considered the introduction of an additional risk assessment for some countries and that this assessment has subsequently been replaced by the list of prohibited species.

As FoW have many years of hands on experience with forest management and the FSC system and FSC certification on the ground (both good and bad) from 25 years working with sustainable forest management in Latin America, we are available to contribute to an improved list of prohibited species based on CITES and IUCN.

Yours Sincerely



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Tropical forest management and conservation expert.