

RESPONSE FORM - TPAC Stakeholder Forum



STIP

Respondent	
Name:	
Organisation:	FSC Nederland and PEFC Nederland
Country:	The Netherlands
Date:	1 st August 2019

Chain of Custody (CoC)	
Chain of Custody system	P 1. A Chain of Custody (CoC) must be in place from the forest unit of origin to the final point of sale, which provides a link between the certified material in the product or product line and certified forest units.
Chain of Custody group certification	P 2. If Group certification of the CoC is allowed, the standard must require that the group as whole must comply with the same requirements which are posed on individual companies.
Logos and labels	P 3. Logos and labels that belong to the certification system and occur on products and documents shall have an unambiguous meaning and shall be applied in accordance with the rules established by the certification system.

Development, Application and Management of certification systems (DAM)	
Standard development	P 1. The process of standard development and the standard itself shall fulfil the requirements as established by international umbrella organisations (such as ISO and ISEAL).
System manager	P 2. The certification system shall be managed by a legal entity (system manager). The tasks and responsibilities shall be clearly distributed among the organisations, which form an organisational and/or functional part of the system.
Decision-making bodies and objection procedures	P 3. Decision-making bodies shall reflect the interests of stakeholders and shall provide for adequate procedures for objection and appeal regarding the decisions made and the functioning of the decision-making bodies.

Certification bodies and procedures	P 4. Certification bodies shall be independent and shall be competent to assess sustainable forest management and the chain of custody system.
Accreditation	P 5. The accreditation agencies that grant the accreditations for certification of sustainable forest management and/or the chain of custody shall be competent and independent, national or international organisations that are preferably member of the IAF.

General comments

An appeal was filed against TPAC's former assessment of STIP. The Board of Appeal of TPAC decided (14th Jan 2019) that TPAC had wrongly approved STIP for the Dutch Procurement Policy. We expect that TPAC will not only report back at the end of the assessment procedure on how the forum comments are taken into account but also that TPAC shows that the outcome and each comment of their own Board of Appeal are taken into account in the current assessment of STIP.

STIP has no own relationship with sustainable forest management. Certification schemes FSC and PEFC invest a lot in forests to prevent deforestation, to protect ecological valuable areas, to improve working conditions, indigenous people's rights and biodiversity. These investments are done a.o. with the fee contributed by Chain of Custody certified companies worldwide to these schemes. Since there is a clear relation between their standards for responsible forest management and Chain of Custody, they support the Dutch government's ambitions to procure sustainable and to promote sustainable forest management. The use of sustainably produced timber is an important success factor in the implementation of the Dutch Climate Agreement as forests capture and store CO₂. Initiatives like STIP facilitate companies at the end of the Chain of Custody but make no direct effort to improve sustainable forest management. Although we recognize that STIP offers a practical solution regarding mixing PEFC and FSC at the end of the timber chain, we expect that TPAC not only assesses the technicalities of STIP, but also judges the contribution of STIP itself to the ambitions of the Dutch government regarding sustainable public procurement, climate SDGs impacts and last but not least promotion of sustainable forest management.

TPAC itself states about their role that they "assess certification systems based on the Dutch Procurement Criteria for timber and to advise the State Secretary of Infrastructure and Environment on the outcome of the Assessments". TPAC defines a certification system as: "A legally registered system which has the objective to promote sustainable forest management through certification of forest management and of the associated chain of custody". Since STIP itself does not provide standards for responsible forest management, it should not be considered as a certification scheme as defined by the Dutch Government and because of her ambitions.