

Mr Kim Cartensen  
Director General  
FSC International Center  
Charles de Gaulle Strasse 5  
DE-53113 Bonn

23 October 2013

Dear Mr Cartensen

### **Concerns with the Online Claims Platform (OCP)**

I write to reinforce concerns and comments made by our European colleagues in CEPI, a number of CPI member companies and also colleagues representing other parts of the UK wood fibre using industry.

Concerns focus on a number of areas;

- **Proportionality.** Whilst there is general support to further improved traceability and credibility of the FSC certified claims supply chain, there is no conviction that there is an existing problem at a scale to require a response of this type. FSC has not presented evidence of false claims being a major issue for the credibility of the system, nor were members consulted on the implementation of the OCP. If there is a real issue there may be better ways to address the problem than through the OCP.
- **Confidentiality.** It is appreciated that the proposed system is designed so that no additional information beyond that already shared with the certification body is required. However with such an internet based system there is risk of confidential information being shared unintentionally (fraud, hacking) or even intentionally (aggregated information being made available outside the platform.) A number of our members will be very reluctant to input commercially confidential data.
- **Administrative burden and cost.** The administrative burden related to the set-up and running of the current untested system has the potential to lead to considerable cost increases for companies, especially at a time of increases to the AAF fee. For some, these cost increases might be prohibitive and especially smallholders may be further turned away from the FSC.
- **Lack of readiness and IT risk.** The overall costs and benefits of the proposals have not been openly considered, nor has the pilot study been properly assessed.
- **Risk to FSC.** We see a real danger that a number of those currently using (or planning to use) FSC could withdraw from the system. There could be a real damage to both the image and finances of FSC.

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Accordingly we recommend that FSC conclude pilot testing and take the lessons from that process, together with concerns referenced above (and also separately raised by CEPI) when proposing any changes to FSC systems.

FSC should investigate alternative and proportionate ways to meet the objectives behind the OCP proposals while causing less confidentiality concerns and administrative burden and at the same time seeking far stronger buy-in by the certificate holders in the process.

Yours sincerely

A handwritten signature in black ink, appearing to read 'DWP', with a long horizontal line extending to the right.

David Workman  
Director General