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Latvian Forest Certification Council
Jānis Švirksts – Executive Director
Rīga, Kuģu street 11-608
LV-1048 Latvia

05-06-2018

Subject: Your e-mail regarding “FSC development in Latvia” dated 10 April 2018

Dear Jānis Švirksts,

Thank you for your letter about FSC development in Latvia. Anand Punja, Regional Director for Europe provided a detailed explanation regarding FSC Baltics in his e-mail to you dated 13 April 2018. We provide a summary of the other two topics below (the course of approval of the CNRA and the development of guidelines for risk mitigation). We hope that it provides sufficient clarification.

1. The course of approval of the CNRA

We are sorry that you perceive the process for risk assessment has not been transparent. We are working to improve the level of accessibility of the information we provide.

The timeframe set by stakeholder expectations and actioned by the FSC International Board of Directors, along with the low capacity of FSC Network Partners as in the case for FSC in Latvia, were the main reasons why the overall process was led centrally by FSC International. This proved to be the best possible solution in many countries in order to deliver a risk assessment of sufficient quality that will be used by the industry when sourcing controlled material for mixing with FSC certified fiber, instead of company risk assessments.

Until now, CNRAs have been developed and approved according to the already established FSC National Risk Assessment (NRA) framework (FSC-PRO-60-002a V1-0) and internal procedures.

Internal procedures were formalized in the [CNRA procedure](#) (PSU-PRO-10-002 V1-0) to set a publicly available framework for the development, approval and revision of CNRAs.



For CNRAs centrally led by FSC International, an internationally led round of public consultation was carried out. The feedback gathered was assessed by FSC International and only those comments supported by clear, objective and undisputable evidence were taken into account and led to a change of the risk assessment.

2. CNRA Risk Mitigation Working Group

As the recommended control measures provided in the CNRA were questioned by some of the stakeholders, our Forestry Program Coordinator in Latvia, Mr. Imants Krūze (previously the National Representative of FSC in Latvia), revised the already outdated category 1 assessment and began developing guidelines for control measures of category 3 together with the CNRA consultant for categories 1 and 3 (NEPCon). The guideline provides examples of a minimum set of risk mitigation measures for certificate holders.

Meetings on possible stakeholder involvement in the guideline development were organized with some of the key stakeholders, including representatives of Latvian Forest Industry Federation, Latvian Forest Owners' Association, Pasaules Dabas Fonds and NEPCon among several companies). Since some certificate holders participating in the meetings had already drafted their DDS (including control measures), these were used as valuable feedback regarding the recommended control measures in the CNRA. Further meetings were organized with certificate holders and relevant certification bodies (CBs).

At the same time, FSC International initiated a joint control measures project for Europe to develop country/region specific control measures for the approved CNRAs with specified risk. In this project, FSC International is facilitating the collaboration between various groups of stakeholders.

FSC encouraged Mr. Krūze to advance with the Latvian process in parallel. We envisage a comparison of the results from the different national processes and their eventual incorporation into the FSC Joint Control Measures Project. Our ultimate objective is to develop a set of "FSC approved control measures" for various countries for different indicators.

Mr. Krūze has informed us about concerns raised by the stakeholders and CBs involved in the process. To reduce the risk of corrective action requests issued according to the guidance all control measures designed as part of the project need to meet three key criteria:

1. They are adequate to mitigate the risks identified;
2. they are practically implementable in the field;
3. they are agreed to by consensus among all members of the core team.

Mr. Krūze was advised to follow the above and has been provided with instructions on what steps to take. We believe that this information was also shared with the stakeholders involved. (i.e. it was discussed with the participants of the meeting that took place on 13 April 2018) with no standing objections on establishing a chamber balanced working group.



As a global organization, we need to make sure that we are globally aligned to guarantee our integrity and credibility. It is a distinguishing feature of FSC to have chamber balanced working groups to develop acceptable agreement within a wide range of stakeholders representing different views.

HCV definition

The interim standards currently used in Latvia are based on the FSC's Principles and Criteria (P&C) V4, which had a definition of High Conservation Value Forests (HCVF). The definition of High Conservation Values (HCV) was introduced in P&C V5 in 2012. Due to the fact that the transfer process of the NFSS for Latvia to the new P&C has not yet been finalized, the new concept of HCVs has not yet been fully introduced into the system of Forest Management Certification in Latvia, while the CNRA follows the revised definitions.

Future cooperation with FSC Baltics

We understand that the current CNRA brings additional work for the companies that have to mitigate the risks identified and this is why FSC Baltics with Mr. Krūze in particular is supporting the industry to mitigate risks in a credible way.

We hope that you will take the opportunity to cooperate further with FSC Baltics and Mr. Krūze, who are open to provide further support.

Should this letter not satisfy your need for clarification, you may contact our [Dispute Resolution Team](#).

Yours Sincerely,

A handwritten signature in black ink that reads "Nowakowska".

Dr. Joanna Nowakowska

Program Manager (Controlled Wood)