



**World Wildlife Fund**  
**Forest Program**  
1250 24<sup>th</sup> St. NW  
Washington, DC 20037-1193

Main Phone: 202-293-4800  
Direct Phone: 202-822-3450  
Fax: 202-861-8378  
Bruce.Cabarle@wwfus.org

worldwildlife.org

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Dear Mr. Horst and LEED Steering Committee Members:

We commend the U.S. Green Building Council (USGBC) on the leadership it demonstrated in developing the The Leadership and Environmental and Energy Design (LEED®) green building standard and in particular for including the Certified Wood credit (MR7) for Forest Stewardship Council (FSC) certified wood. We understand that with the emergence of other certification systems, USGBC is under increasing pressure to expand the credit to other systems and is seeking to develop a baseline set of criteria that must be met for wood to be rewarded in LEED. I am writing to share with you World Wildlife Fund's *Forest Certification Assessment Guide* and the results of various assessments of certification systems that WWF has undertaken, which may be useful to USGBC.

WWF has faced a similar challenge in its work to provide technical and financial assistance to the development of certification systems and to the development of national standards processes through its partnership with the World Bank, the WWF/World Bank Global Forest Alliance (Alliance). Given the variety of forest certification systems which exist, a common and systematic framework for WWF and World Bank managers was needed to evaluate the different systems for their adherence to the principles and requirements that both organizations have agreed are important. The Global Forest Alliance identified a set of eleven elements, as detailed in the attached, that should be part of any standard for improved forest management. In addition, certification systems or schemes for independent verification of improved forest management should be based on a robust set of criteria (Attachment).

In August 2006, the Alliance published a tool for assessing the comprehensiveness of forest certification systems. The *Forest Certification Assessment Guide* (Guide) will help determine whether systems for certifying the sustainable management of commercial forests meet Alliance criteria and will guide decisions by the World Bank and WWF in their support for sustainable forest management projects. Formerly known as the *Questionnaire for Assessing the Comprehensiveness of Certification Systems/Schemes*, the tool is the culmination of three years of testing, refinement, and external consultation. WWF and the World Bank – working together under the Alliance - have comprehensively simplified and redesigned the Guide, structuring it around widely used existing frameworks such as ISO, as well as both organizations' criteria for sustainable forest management.

While the Guide has been designed for WWF and World Bank managers, others - including USGBC - may find it to be a useful tool. WWF encourages USGBC to consider using the Guide in its process to determine which certification systems qualify for LEED credit.

Although we have not yet applied the Guide in the U.S., we would like to share the results of previous tests WWF has been involved in, including the trial of the *Questionnaire for Assessing the Comprehensiveness of Certification Systems/Schemes*. In 2005 WWF was involved in three studies in Europe to gain insights into how two forest certification systems, the Forest Stewardship Council (FSC) and the Programme for Endorsement of Forest Certification schemes (PEFC), perform and

deliver against key elements WWF considers important for a system's credibility. The three key elements on which WWF tested the performance of FSC and PEFC were:

- whether the scheme drives significant improvements in forest management on the ground;
- whether a scheme design meets as a minimum WWF's core values with respect to meaningful and equitable participation of all major stakeholder groups, reliable and independent assessment, certification decisions free of conflicts of interest, transparency in decision making and reporting; and
- whether the system delivers consistency across countries.

The following three studies were used for gaining insights on the abovementioned key elements:

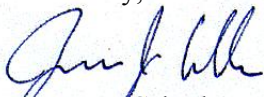
1. The WWF/World Bank Alliance trial of the *Questionnaire for Assessing the Comprehensiveness of Certification Schemes/Systems* in 12 European countries;
2. The parallel certification test conducted by UPM in Europe and Canada; and
3. An analysis of Corrective Action Requests (CAR) of FSC and PEFC across six countries in Europe.

Findings from these studies have for the first time highlighted key differences and similarities between individual national schemes. While they indicated improvements in both FSC and PEFC throughout Europe over the last five years, these studies also confirmed that significant differences still exist between the two. These studies clearly demonstrate that FSC meets the abovementioned three key elements of fundamental importance to WWF. PEFC demonstrated inconsistency, was more difficult to measure due to lack of transparency, and, in most cases, was inferior to FSC. WWF can therefore only recommend FSC to consumers, forest owners, governments, companies, financial institutions and other concerned stakeholders as delivering on credible forest certification.

Additionally, the results of a forest policy and certification review conducted as part of WWF-Canada's Nature Audit in 2003<sup>1</sup> ranked FSC the highest among certification schemes and existing forest regulations. The review, conducted against 33 ecological indicators, clearly shows that CSA and SFI are certifying status quo forestry.

As one of the world's largest and most experienced independent conservation organizations, World Wildlife Fund is committed to the conservation of the world's forest resources. WWF believes that responsible management of production forests is a key strategy for conserving the world's forests and has supported credible certification as an important tool for verifying and promoting good forest management. Given the comprehensive process that WWF and the World Bank have engaged in to develop the Guide and its resulting broad stakeholder support, we hope the USGBC will take advantage of this tool in its process to develop objective criteria for assessing certification systems that are based on your organizational values. Further, we welcome the opportunity to support USGBC in this endeavor.

Sincerely,



Bruce J. Cabarle  
Managing Director, Forest Program

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<sup>1</sup> available at <http://wwf.ca/AboutWWF/WhatWeDo/TheNatureAudit/TheNatureAudit.asp?page=0.1>

## ATTACHMENT

### **WWF/World Bank Global Forest Alliance Critical Elements for Standards for Improved Forest Management**

- Compliance with all relevant laws
- Respect for tenure and use rights
- Respect for indigenous peoples' rights
- Respect for community relations
- Respect for worker rights
- Delivery of multiple benefits from the forest
- Assessment and mitigation of environmental impact
- Maintenance of critical forest areas
- Specific provisions for plantations
- Implementation of a management plan
- Effective monitoring and assessment

### **WWF/World Bank Global Forest Alliance Criteria for Certification Systems or Schemes for Independent Verification of Improved Forest Management**

- Compatibility with international frameworks for certification accreditation and standard setting
- Compatibility with globally applicable principles that balance economic, ecological, and equity dimensions of forest management and meet Global Forest Alliance requirements
- The meaningful and equitable participation of all major stakeholder groups in governance and standard setting
- Avoidance of unnecessary obstacles to trade
- Objective and measurable performance standards that are adapted to local conditions
- Certification decisions free of conflicts of interest from parties with vested interests
- Transparency in decision making and public reporting
- Reliable and independent assessment of forest management performance and chain of custody
- Delivery of continual improvement in forest management
- Accessibility to and cost-effectiveness for all parties
- Voluntary participation