



Environmental Pillar
Working for a sustainable future

The Environmental Pillar
MACRO Centre
1 Green Street
Dublin 7
Tel: 01 878 0116
www.environmentalpillar.ie

PEFC International
ICC Building C
Route de Pré-Bois 20
Case Postale 1862
1215 Geneva 15
Switzerland

09/12/2022

Environmental Pillar Letter to PEFC International Calling for the Suspension of Draft PEFC Irish National Forest Standard Public consultation on behalf of PEFC Social and Environmental Stakeholder Group

To the Directors of PEFC International.

I am writing to you on behalf of the Environmental Pillar, an organisation that works to represent the views of 32 of Ireland's leading environmental NGOs. We work to promote environmental sustainability and the protection of our natural environment. We are the largest NGO stakeholder in the PEFC process, and were asked to represent the PEFC civil society social and environmental stakeholder group made up of Macroom and District Group, The Golden Eagle Trust, The Woodland League, Celtic Druid Temple and Save Leitrim.

You will have noted we contacted you in May 2022 via our Environmental Pillar PEFC working group representative Andrew St Ledger, with a view to meeting with Michael Berger and PEFC Ireland Directors, on behalf of the PEFC social and environmental stakeholder group to discuss a number of outstanding issues regarding procedures and representation, during the period when PEFC International were meeting in Dublin in June 2022.

We were disappointed that this request could not be accommodated at the time but remained optimistic that a meeting with PEFC Ireland Directors could be arranged. Brendan Lacey communicated this possibility on May 30th via email, explaining William Merivale had taken leave and that an appointment would be set up on his return. Unfortunately, this did not materialise and Save Leitrim PEFC stakeholder group initiated a formal

Environmental Pillar Members: An Taisce. Bat Conservation Ireland. BirdWatch Ireland. CELT - Centre for Ecological Living and Training. Coastwatch. Coomhola Salmon Trust. Cultivate. Eco-Advocacy. ECO-UNESCO. Feasta. Forest Friends. Friends of the Earth. Global Action Plan. Gluaiseacht. Good Energies Alliance Ireland. Green Economy Foundation. Green Foundation Ireland. Hedge Laying Association of Ireland. Irish Peatland Conservation Council. Irish Seed Savers Association. Irish Whale and Dolphin Group. Irish Wildlife Trust. Leave No Trace Ireland. Native Woodland Trust. The Organic Centre. The Rediscovery Centre Ireland. Sonairte. Sustainable Projects Ireland, Vincent Wildlife Trust. VOICE. Wildlife Rehabilitation Ireland. Zero Waste Alliance Ireland.



Environmental Pillar

Working for a sustainable future

The Environmental Pillar
MACRO Centre
1 Green Street
Dublin 7
Tel: 01 878 0116
www.environmentalpillar.ie

complaint to PEFC International outlining a number of the procedural issues that the Environmental Pillar also wished to see addressed.

We have patiently awaited the outcome of this approach and once again were disappointed to see that none of the issues were adequately addressed, in fact they appear to have been completely ignored.

In the meantime, our PEFC representative Andrew St Ledger, sought support from the Environmental Pillar steering committee at their meeting in September 2022 to progress the Pillar reaction and responses, unfortunately due to other priorities this issue was deferred to 8th December, hence the delay in our communications.

With regret, we feel we are left with little choice but to seek the suspension of the draft PEFC Irish national forest standard public consultation process until all of the procedural and stakeholder representation mandate issues have been addressed. Furthermore, we are withdrawing our support for the current draft national forest standard with immediate effect, as we feel it is deeply flawed and will not deliver Sustainable Forest Management in Ireland, as promised by PEFC certification. As the current PEFC draft Irish national forest standard stands we feel it will hamper and delay the implementation of Sustainable Forest Management in Ireland at a critical juncture when we most need the forestry sector to demonstrate real ambition by embracing a fundamental shift in approach to deliver meaningful climate change mitigation and biodiversity restoration.

We believe that the proposed national public consultation needs to be suspended in order for the procedural issues to be resolved. For example, the standard drafting process continued despite there being several unresolved procedural complaints. There were multiple breaches of the PEFC Ireland and PEFC International Standard Setting Rules. The PEFC Ireland Rules for Standard Setting were amended twice during the process without any consensus of the Working Group. The Environmental Pillar would not have agreed to participate in this PEFC process had we anticipated such grave procedural failings. This change alone subverted the whole process.

We eagerly await your response.

Environmental Pillar Members: An Taisce. Bat Conservation Ireland. BirdWatch Ireland. CELT - Centre for Ecological Living and Training. Coastwatch. Coomhola Salmon Trust. Cultivate. Eco-Advocacy. ECO-UNESCO. Feasta. Forest Friends. Friends of the Earth. Global Action Plan. Gluaiseacht. Good Energies Alliance Ireland. Green Economy Foundation. Green Foundation Ireland. Hedge Laying Association of Ireland. Irish Peatland Conservation Council. Irish Seed Savers Association. Irish Whale and Dolphin Group. Irish Wildlife Trust. Leave No Trace Ireland. Native Woodland Trust. The Organic Centre. The Rediscovery Centre Ireland. Sonairte. Sustainable Projects Ireland, Vincent Wildlife Trust. VOICE. Wildlife Rehabilitation Ireland. Zero Waste Alliance Ireland.



Environmental Pillar

Working for a sustainable future

The Environmental Pillar
MACRO Centre
1 Green Street
Dublin 7
Tel: 01 878 0116
www.environmentalpillar.ie

Fintan Kelly
Environmental Pillar
Agriculture & Land Use Policy & Advocacy Officer

Environmental Pillar Members: An Taisce. Bat Conservation Ireland. BirdWatch Ireland. CELT - Centre for Ecological Living and Training. Coastwatch. Coomhola Salmon Trust. Cultivate. Eco-Advocacy. ECO-UNESCO. Feasta. Forest Friends. Friends of the Earth. Global Action Plan. Gluaiseacht. Good Energies Alliance Ireland. Green Economy Foundation. Green Foundation Ireland. Hedge Laying Association of Ireland. Irish Peatland Conservation Council. Irish Seed Savers Association. Irish Whale and Dolphin Group. Irish Wildlife Trust. Leave No Trace Ireland. Native Woodland Trust. The Organic Centre. The Rediscovery Centre Ireland. Sonairte. Sustainable Projects Ireland, Vincent Wildlife Trust. VOICE. Wildlife Rehabilitation Ireland. Zero Waste Alliance Ireland.