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The Campaign to STOP GE Trees
Anne Petermann
266 Elmwood Avenue, Suite 307
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USA

09 March, 2015

Your Open Letter calling FSC to disassociate from Suzano/FuturaGene

Dear Mrs Petermann,

On the occasion of our General Assembly in Seville in September 2014, members of the international Campaign to STOP GE Trees were formally requesting, through an open letter, that we disassociate from our member, Suzano, "based on FSC Principles and Criteria". You had argued in that letter that by making a request for commercialization of GE eucalyptus trees, Suzano would already be in violation of FSC criteria.

At the same time, you stated that "Suzano *will be* in violation of FSC's requirements for certification" and further that "the request for widespread commercialization of GE eucalyptus trees in Brazil from FuturaGene *will* clearly violate their FSC certification."

As you rightly point out, use and commercial introduction of GE Trees or "Genetically Modified Organisms" (GMOs) is strictly excluded by FSC policies and standards, not only within FSC certified forests but for any part of an organization that is associated with FSC through certification or membership:

- FSC's Principles and Criteria are very clear on the issue of GMOs, stating unequivocally that, "use of genetically modified organisms shall be prohibited."¹
- FSC's Policy for Association is equally clear, stating that, "FSC will only allow its association with organizations that are not directly or indirectly involved in.... e) Introduction of genetically modified organisms in forestry operations."²

FSC therefore takes Suzano's application for commercial deployment very seriously and is exploring the implications. However, while an application for permission to introduce GMOs is obviously a strong indication of future intent, it does not constitute an introduction at present. This situation also would not change if Suzano received permission by CTNBio to move towards commercialization, as long as it does not result in actions on the ground. As a result,

¹ See: FSC-STD-01-001 v4-0 EN at <https://ic.fsc.org/standards.340.htm>

² See: FSC-POL-01-004 v2-0 EN at: <https://ic.fsc.org/policy-for-association.315.htm>



the company currently remains in compliance with our Policy for Association which is based on actual “unacceptable activities”. For a number of reasons, including strong legal ones, our policies cannot be applied on a concept of "unacceptable intentions".

The company further is and will remain in compliance with our FSC Principles & Criteria as long as GMOs are not used within the boundaries of the certified forest management units.

Finally, the FSC Policy on GMOs (FSC-POL-30-602) clarifies that research into GMOs may not take place in FSC-certified forests. Relevant field trials, however, are permissible by FSC-certified operations if they are conducted in non-certified areas.

In summary, currently Suzano is not in violation of any FSC rules on the use of genetically modified trees as long as it does not establish field trials in FSC-certified forests or proceed towards commercial planting.

Be assured that FSC will monitor this situation closely and will take measures under our relevant policies and standards should the above outlined conditions for considering Suzano to be conforming with our normative framework no longer apply.

Sincerely,

KIM CARSTENSEN
FSC DIRECTOR GENERAL