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Subject: This letter concerns the approved FSC Interim National Standard for Latvia

Dear Kim Carstensen and Members of the Board.

We appreciate the efforts FSC International invested in preparing the FSC Interim National Standard of Latvia (further – INS) following the suspension of the National Standard development process. However, despite the vast amount of working time and professional efforts the FSC International staff invested, we have to admit, that the approved INS is not acceptable to the social and economic chamber. Some of the approved requirements, with most significant social-economic impacts, are written without clear wording and from one audit to another they can be interpreted in different ways which may result in severe challenges to the economic viability of the certificate holders and overall sustainable development.

We participated in the public discussions with the goal to improve wording of the indicators and definitions so that they would be auditable and implementable and would take into account the national laws and regulations, local conditions of forest ecosystems and knowledge gained from the present and past management practices that we are proud of. However, we are deeply disappointed to see that the new version of the INS differs significantly from the INS version which was discussed and tested in Latvia. Furthermore, to our great surprise, some of the indicators are newly introduced in the approved INS without, field testing and any discussions with the national stakeholders and appropriate national adaptation. This is a clear contradiction to the statement of FSC that "the standards are locally adapted to address the on-the-ground realities".

When we asked the FSC representative how interpretation risks we have identified in the approved INS could be addressed, we were surprised that the certificate holders were advised by the FSC representative to hold private meetings with CB's and agree upon the standard interpretations as it is done in Lithuania. Such an approach is not acceptable to Latvia, neither legally, nor culturally. The indicators/definitions must be clear, applicable and auditable, available for impartial scrutiny by any side.

The Standard is the key tool in all the certification processes, therefore, for us it is important that the INS contains clear wording without any interpretation risks. The certification systems shall be transparent and ensure fair competitiveness.

Taking into consideration all the above mentioned, we kindly ask to suspend the INS for further elaboration and allow the certificate holders to be certified against the Interim FSC Standards developed by the CB's (the standards that we are using up to now). Also, we kindly ask FSC to ensure that national interest groups are involved in the development of the next version of the INS. National stakeholders shall be given opportunity to discuss the INS content in a transparent and stakeholders engaging way.

As National stakeholders and FSC International members, we truly believe that the FSC Standard setting process has to be open and transparent to all, so would like to invite You to visit Latvia to discuss the present situation with the INS and it's interpretation risks and find the ways how to continue with the FSC forest management certification in Latvia.

We would highly appreciate it if you would reply by July 7. If necessary, we can meet in person so as to discuss all mentioned above.

Sincerely,

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