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Dear Mr Lawson,

Thank you for your letter of 28 January concerning the forest management certificates issued under the PEFC-endorsed Indonesian system. We recognise the seriousness of the issues raised and the level of stakeholder concern associated with these cases.

At the outset, and following up on your in-person meeting with my colleagues Thorsten and Robert yesterday, we want to address one central point directly. We are aware that the scope-based certification model, including what is commonly referred to as partial certification, raises legitimate integrity and perception concerns in the Indonesian regulatory and land-use context. We acknowledge that, in certain contexts, the scope-based certification model may produce outcomes that, while technically compliant with current rules, do not fully align with PEFC's and stakeholder expectations that certificate holders manage their forests consistent with sustainable forest management principles within their entire concession, including land-use change outside certified areas. Protecting system integrity on this issue is currently an active governance priority.

As discussed on 11th February, we will work with the Indonesian Forestry Certification Cooperation (IFCC) to identify and introduce, in the short term, additional conditions, interpretative clarifications, and other temporary safeguards designed to strengthen integrity controls around scope-based certification. This responds to the specific challenge in Indonesia, where the regulatory land-use framework permits certain conversions outside certified areas. We are fully aware of this context-specific risk and are actively addressing it.

It is important to highlight again that certification confirms compliance with IFCC/PEFC requirements within the audited scope only and does not constitute approval of activities beyond that scope. The scope-based approach was originally designed to enable a transition pathway: bringing defined management areas under independently verified requirements while making certification conditional on compliance going forward. It was not intended to legitimise past land-use changes, even where such changes were permitted under applicable law.

As part of the ongoing PEFC system revision process, implementation experience across jurisdictions is being reviewed to assess how scope definitions, eligibility conditions, and integrity safeguards should be strengthened to remain credible and auditable. This revision also includes examination of group-level accountability mechanisms, including whether and under what conditions certification eligibility could be affected where companies within the same corporate group are found to have violated applicable PEFC requirements, irrespective of whether such violations occur inside or outside certified scope. Where substantiated evidence indicates that scope-based certification is being applied in a way that undermines PEFC integrity requirements or stakeholder expectations, PEFC is prepared to consider interim governance measures in relevant jurisdictions pending completion of the revision process.

Concerning the certificates issued to PT Mayawana Persada and PT Industrial Forest Plantation and the endorsement of IFCC, our immediate focus is on working with IFCC to strengthen applicable safeguards and introduce stricter short-term conditions and clarifications around scope-based certification so that the system can remain operational for responsible forest managers while preventing certification from being applied in situations that conflict with PEFC integrity requirements, including cases involving recent land-use change outside certified scope. These measures are intended to address the identified risk directly at system level.

We remain committed to addressing this issue transparently and pragmatically, and to further strengthening the system where needed to ensure that PEFC certification continues to meet its integrity objectives and expectations in promoting sustainable forest management.

Yours sincerely,



Michael Berger
Secretary General and CEO, PEFC International