

To: Ken Newcombe, Senior Manager Carbon Finance Business – World Bank
CC: Daniel Gross, World Bank

Brasil, 17 september 2003

Dear Mr. Newcombe,

We are writing to confirm that we received your letter dated 23 July 2003, sent to the organizations and citizens that signed the letters of 26 March and 23 May 2003, in which we urged the bank not to invest in the project that the company Plantar presented to the PCF (*Prototype Carbon Fund*), a fund for “carbon credits” projects, administrated by the World Bank.

Firstly, we want to remind you that on 21 July we sent, by email, a third letter to the World Bank in which we asked for a formal apology from you and from the Bank because you disseminated a false allegation made by Plantar. We observed on 18 August that a notice was put on the PCF-site, apologising for this false alegation. We thank you for your recognition of this fact and hope that this type of grave mistake will not be repeated in future. We recommend that you send this notice to all the signatories of the letter of 21 July.

Secondly, we do not consider your letter of 23/07/2003 a sufficient response to the various issues raised by us, because of the fact that you did not respond to the contents of our letters. Instead, you affirm that the Bank considers the FSC-certification sufficient to deal with our issues, something to which we do not agree, with vehemence, because of the following:

- The *Prototype Carbon Fund* (PCF) of the World Bank is an initiative with a history, proceedings and aims very different from those of the *Forest Stewardship Council* (FSC). For this reason, one process – the FSC certification – cannot serve as a basis for another process – the approval of a project by the PCF. Besides, when we criticize the readiness of the PCF in giving support to the Plantar project, we understand that it is the PCF that has to respond to the criticism, making its own field visits, studies, evaluations and reflections.
- We can give an example of your proposal in using the FSC certification, citing the first environmental issue that you pretend to deal with in more depth: “*Is a monitoring system in place to assure that only former pasture land is used for forest plantation?*”. This is a criterion – only using pasture land – used by the PCF for projects involving tree plantations, but it does not refer to any specific criterion of the FSC.
Besides this, SCS, who only discusses issues related to “good forest management”, cannot respond to our criticism related to the “carbon credits” aspects of the project. It is worth noting that SCS describes the “carbon project” of Plantar in a very superficial way, besides making mistakes in the explanation of what it is about.
- We consider the FSC as one of the most interesting initiatives ever seen in the field of forest certification. However, we can also see that at the global level, a growing debate exists about certification of industrial tree plantations with the FSC-certificate, especially in the countries of the South. In the case of Plantar, this has been well illustrated by the evaluation coordinated by the World Rainforest Movement (WRM) of the FSC certification of the companies Plantar and V&M Florestal. This evaluation was executed in October 2002 and the conclusion of the study indicates the necessity of a profound revision of the principles and criteria of the FSC in relation to the certification of tree plantations. The way that the FSC certification has been done in the case of the companies Plantar and V&M Florestal does not guarantee environmental quality and social equity, according to the results of the WRM study. Besides, this report raises a series of doubts in relation to the way SCS conducted the certification process, making its impartiality in the process questionable.

Finally, we regret your resistance in wanting to discuss “*questions of such broad scope*”, contradicting initiatives of your Bank in wanting to contribute to the debate about “sustainable development” in Brazil. We know that the slogan of the PCF is “learning by doing”. In this sense, if the Plantar project intends to be an exercise in knowing better the projects that involve large-scale tree monocultures, it is of fundamental importance to understand the context of a project of this type at a local, regional, national and international level, besides understanding its social, cultural, economical and environmental implications in the country where it is being implemented.

In view of the above, we have the following proposals to make:

1. That the dialogue between the World Bank and us is a direct one, without involvement of the SCS, FSC-Brasil or Plantar.
2. That a meeting is held between the World Bank and the signatories of this letter, a possibility that has been mentioned by the Bank itself in some occasions; we even accept that not all the signatories can be present at this meeting, but we do not accept at all that a conversation takes place between the Bank and only some signatories of the letteres. The agenda of such a meeting would include the contents of the different letters sent by us to the Bank.
3. The World Bank should make its own evaluation of the project, independently; we alert you to the fear and inhibition that the workers and the communities feel in front of the company; this calls for field visits without the presence of the company; we are willing to accompany these visits.

We propose that four organizations, one of each state, facilitate the contact in view of a meeting with the World Bank: CEDEFES (MG), FASE-ES, CEPEDS (BA) and APADEMA (RJ).

We look forward to your reply,

Yours sincerely,

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- 2- ACPO - Associação de Consciência à Prevenção Ocupacional (Association of Conscience on Occupational Prevention/Brazil) - acpo94@uol.com.br
- 3- AGB-BH - Associação dos Geógrafos Brasileiros Seção Local de Belo Horizonte (Brazilian Association of Geographers – Belo Horizonte’s dept./Minas Gerais/ Brazil) - agb-bh@bol.com.br
- 4- AGB-ES - Associação dos Geógrafos Brasileiros - Seção Vitória (Brazilian Association of Geographers - Vitória/Espírito Santo/Brazil) - pscarim@hotmail.com
- 5- AGB-RJ - Associação dos Geógrafos Brasileiros - Seção Rio de Janeiro (Brazilian Association of Geographers – Rio de Janeiro/Brazil) - agbrio@bol.com.br
- 6- APEDEMA (environmental association/Rio de Janeiro/Brazil) - executiva@apedema.org
- 7- Artur de Souza Moret - Forum de debate sobre energia de Rondônia (Debate Forum on energy from Rondônia/Rondônia/Brazil) - arturmoret@ig.com.br
- 8- Associação de Mulheres Unidas da Serra (Women’s United Association/Serra/Espírito Santo/Brazil)- cddh@terra.com.br
- 9- Bicuda Ecológica (environmental organization/Rio de Janeiro/Brazil) bicuda@bicuda.org.br
- 10- Brice Bragato – Deputada Estadual PT/ES (State Member of Parliament/ Espírito Santo/Brazil) - bricebragato@al.es.gov.br
- 11- CAA – Centro de Agricultura Alternativa - CAA - Centro de Agricultura Alternativa (Centre for Alternative Agriculture/Minas Gerais/Brazil) - caa_nm@connect.com.br
- 12- CADH – Centro de Apoio aos Direitos Humanos (Centre for Support of Human Rights/Vitória/Espírito Santo/Brazil) – dhumanos@uol.com.br
- 13- Campo Vale - Centro de Assessoria aos Movimentos Populares do Vale do Jequitinhonha (Minas Novas/MG) (Support centre for Popular Movements of the Jequitinhonha Valley/Minas Gerais/Brazil) - campo@uai.com.br
- 14- Cáritas Diocesana de São Mateus (Cáritas of the Diocese of São Mateus/Espírito Santo/Brazil) secrsama@samanet.com.br
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- 16- Carlos Casteglione – Deputado Estadual do PT/ES - (State Member of Parliament/ Espírito Santo/Brazil) - carloscasteglione@al.es.gov.br
- 17- Carlos Lobo – Direção Estadual do PT/ES (Member of State Directroy of Workers Party/Espírito Santo/Brazil) - lobopt@hotmail.com
- 18- CDDH-Serra - Marta Falqueto (Centre for Defence of Human Rights/Serra/Espírito Santo/Brazil) - cddh@terra.com.br
- 19- CEDEFES - Centro de Documentação Eloy Ferreira da Silva (Documentation Centre Eloy Ferreira da Silva/Minas Gerais/Brazil) – cedefes@cedefes.org.br
- 20- Centro de Direitos Humanos de Teixeira de Freitas (Human Rights Centre of Teixeira de Freitas/Bahia/Brazil) - pejose@uol.com.br

- 21- CEPEDES - Centro de Pesquisa P/Desenvolvimento do Extr. Sul da Bahia (Research and Development Centre of the Extreme South of Bahia/ Bahia/ Brazil) - cepedes@vnet.com.br
- 22- CIMI Equipe ES - Conselho Indigenista Missionário (Indigenist Missionary Council - Espírito Santo/Brazil) - cimies@terra.com.br
- 23- CIMI Equipe Extremo Sul da Bahia - Conselho Indigenista Missionário (Indigenist Missionary Council - Extremo Sul da Bahia /Brazil) -
- 24- Cláudio Vereza – Deputado Estadual – PT/ES – (State Member of Parliament/ Espírito Santo/Brazil) - claudiovereza@al.es.gov.br
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- 26- CUT-ES/ Central Única dos Trabalhadores do Espírito Santo (Federation of Trade Unions in Espírito Santo/Brazil) - secgeral@cut-es.org.br
- 27- CUT-Extremo Sul da Bahia - Central Única dos Trabalhadores/Ext. Sul Bahia (Federation of Trade Unions in Extreme South of Bahia/Brazil) - sindextrsul@dstech.com.br
- 28- CUT-RJ/ Central Única dos Trabalhadores do Rio de Janeiro (Federation of Trade Unions in Rio de Janeiro/Brazil) – cutrj@cut.org.br
- 29- Daniel Ribeiro Silvestre - drsilvestre@uol.com.br
- 30- Dr. Klemens Laschefski – Modevida - Movimento em defesa da vida - Klemens Laschefski - representante Modevida: Movimento em Defesa da Vida (representative Movement in Defence of Life/Minas Gerais/Brazil) – klemens.laschefski@gmx.nest
- 31- Eduardo de Biase - Vereador PT/São Mateus (town-councillor São Mateus/Espírito Santo/Brazil) cmsmes@escelsanet.com.br
- 32- Educafro - Maria da Penha Gaspar Pereira - Pré-vestibular alternativo de Carapina (alternative education course of Carapina/Espírito Santo/Brazil) - cddh@terra.com.br
- 33- Escola Família Agrícola de Jaguaré - responsável Madalena Tonieri (Family School for Agriculture Jaguaré/Espírito Santo/Brazil) - tel. +55 27 37691345
- 34- Escola Família Agrícola de Nestor Gomes - responsável João Rodrigues Pinto (Family School for Agriculture Nestor Gomes/Espírito Santo/Brazil) - tel. +55 27 37630027
- 35- Espaço Cultural da Paz (Cultural Peace Centre/Bahia/Brazil) - Rua da Paz,73/São Lourenço/Teixeira de Freitas(BA)
- 36- Evanete Negris - Vereador PSB/São Mateus (town-councillor São Mateus/Espírito Santo/Brazil) - cmsmes@escelsanet.com.br
- 37- FASE/ES - Federação de Órgãos p/ Assistência Social e Educacional (Federation of Social and Educational Organizations/Espírito Santo/Brazil) - fasees@terra.com.br
- 38- Federação Sindical e Democrática dos Trabalhadores nas Indústrias Metalúrgicas, Mecânicas e de Material Elétrico do Estado de Minas Gerais e, seus Sindicatos dos Trabalhadores Metalúrgicos filiados das cidades de (Trade Union and Democratic Federation of Workers in Metal, Mecanic and Electric materials Industries of the State of Minas Gerais and the metal trade unions that are member of this federations of the towns that follow/Minas Gerais/Brazil): Alfenas, Araxá, Betim, Belo Horizonte e Contagem, Caeté, Cambuí, Divinópolis, Extrema, Governador Valadares, Itajubá, Itaúna, João Monlevade, Juiz de Fora, Lavras, Ouro Preto, Patos de Minas, Pirapora, Pouso Alegre, Raul Soares, Sabará, Santa Luzia, Timóteo, Várzea da Palma, Vespasiano, Varginha, Três Marias, e São João Del Rei. - fsdmg@pib.com.br
- 39- Fernando Soares - PROJETO LEGAL - Organização de Direitos Humanos e coordenação de comunicação da seção Rio de Janeiro da Regional Leste 1 do Movimento Nacional de Direitos Humanos (MNDH-RJ). (Human Rights Organization/Rio de Janeiro/Brazil) comunicacao@projetolegal.org.br
- 40- Fórum Estadual de Mulheres/ES (State Forum of Women/Espírito Santo/Brazil) - gilsahb@terra.com.br
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- 42- Igreja de Confissão Luterana/Brasil - Sínodo do Espírito Santo a Belém - (Lutherian Church-Synod of Espírito Santo at Belém/Brazil) - fam.schubert@uol.com.br
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- 48- Juliana Malerba - FASE-Nacional/Projeto Justiça Ambiental (project environmental justice/Rio de Janeiro/Brazil) brsust@fase.org.br
- 49- Koinonia/RJ - Presença Ecumênica e Serviço (Koinonia/Ecuminic and Service Presence/Rio de Janeiro/Brazil)- koinonia@koinonia.org.br
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- 53- MPA- Movimento dos Pequenos Agricultores (Movement of Small Peasants/ Espírito Santo/Brazil) - stsgp@sgpnet.com.br
- 54- MST/ES - Movimento dos Trabalhadores Rurais Sem Terra/Espírito Santo (Movement of Landless Peasants/Espírito Santo/Brazil)– mst-es@escelsa.com.br
- 55- MST/RJ - Movimento dos Trabalhadores Rurais Sem Terra/Rio de Janeiro (Movement of Landless Peasants/Rio de Janeiro/Brazil) mstrio@datatri.com.br
- 56- Pastoral Operária Arquidiocese de Vitória - Luzineide R.F. Pinto (Church assistance for Workers - Archdiocese of Vitória/Espírito Santo/Brazil) - zena.po@bol.com.br
- 57- Paulo César Scarim - Geógrafo (Geographer/Espírito Santo/Brazil) - pscarim@hotmail.com
- 58- Recuper Lixo - Joel Fanticelli - Associação de Catadores de Materiais Recicláveis (Association of Workers in Recycling of Materials/Espírito Santo/Brazil) - cddh@terra.com.br
- 59- Rede Brasileira de Justiça Ambiental - Rede Brasileira de Justiça Ambiental (Brazilian Network for Environmental Justice/Brazil)- Justicaambiental@comunicante.rits.org.br
- 60- Robson Malacarne – Pastoral da Juventude de Cariacica/ES (youth church social service of Cariacica/Espírito Santo/Brazil)- Robson@belmax.com.br

- 61- Rogério Correia de Moura Baptista– Deputado Estadual PT/MG e líder do bloco parlamentar PT/PCdoB na Assembléia - correia@almg.gov.br
- 62- Sebastião Ribeiro - Advogado Ambientalista (environmental lawyer/Espírito Santo/Brazil)- sefil@uol.com.br
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- 66- Sindicato dos Petroleiros/Espírito Santo (Trade Union of Oil Industry Workers/ Espírito Santo/Brazil) - sindipetro-es@uol.com.br
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- 69- Sindicato dos Trabalhadores Rurais de Rio Pardo de Minas/Minas Gerais/Brazil) - sindtrab2003@aol.com
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- 75- Valdemar Moraes - vereador PSC/São Mateus (town-councillor São Mateus/Espírito Santo/Brazil) - csmes@escelsanet.com.br