



MIGHTY EARTH

Tire Industry Project
World Business Council for Sustainable Development (WBCSD)
Maison de la Paix
Chemin Eugène-Rigot 2B
CP 2075 1211
Geneva 1, Switzerland

October 25, 2018

Re: Soft Launch of Global Platform for Sustainable Natural Rubber

Dear Anne-Cécile and TIP Members,

I am writing regarding Mighty Earth's invitation to participate in the soft launch of the Tire Industry Project's (TIP) Global Platform for Sustainable Natural Rubber (GPSNR) today October 25, in Singapore.

We would first like to thank TIP for extending the invitation to Mighty Earth but for reasons outlined in this letter have decided to abstain from endorsing the Platform and attending the launch event.

As you know, Mighty Earth has been an active and committed participant in all discussions open to us this year regarding new sustainability standards for the rubber and tire industries. Our participation has been based on a long-standing knowledge in the need for such standards, and on a spirit of open, frank, and collaborative dialogue with all parties engaged in the process.

As you know, Mighty Earth has also helped to facilitate the contribution of non-governmental organization (NGO) expertise to the Platform design. This has included providing feedback on crucial aspects of the Platform, including the criteria for founding members, first principles, and proposed governance structure.

Throughout these discussions, Mighty Earth has given TIP the opportunity to adhere to best practices from comparable tropical commodity platforms, and was open to creating a structure that would enable equal and balanced decision-making between industry and non-industry stakeholders. We have presented arguments and evidence showing that, where other platforms embraced equity and parity in decision-making, rapid progress has been made in addressing sustainability issues. And, conversely, where initiatives have not followed these principles, industry has struggled or failed to make headway.

It is therefore with considerable disappointment and frustration that we have determined that today's proposed Platform launch does not substantively address the reasonable expectations of NGOs. The creation of two separate bodies outside of the General Assembly – the industry-only Value Chain Committee, and the multi-stakeholder Advisory and Monitoring Committee – excludes civil society, academic, and farmer representatives from key decision-making roles. Furthermore, the lack of clarity regarding the interaction between these bodies creates a high level of uncertainty about the balance of power across the three groups.

These issues have been compounded by the failure of TIP to communicate in a timely, effective, or substantive way with civil society regarding the above concerns. On September 10, NGOs sent a joint letter to TIP highlighting urgent and outstanding concerns. We have, to this point, still not received a reply to this letter. In addition, discussions taking place between TIP and other advisors such as ISEAL and legal counsel have been exclusive and held behind closed doors. Furthermore, TIP has consistently refused to allow independent arbitration of these discussions by a professional and impartial conflict mediator.

It is for these reasons that Mighty Earth has, regrettably, lost confidence in the current direction of the Platform, and has thus decided to abstain from attending.

We understand that TIP, its constituent tire companies, and other Platform founding members and Observers wish for a dialogue to continue with stakeholders in the lead-up to the "hard launch" of the Platform in March 2019. Mighty Earth is still willing to participate in these discussions to provide guidance on strengthening the governance model, and ultimately generating a strong and comprehensive set of sustainability standards for the rubber value chain.

We await information from the Platform Secretariat about future plans for engaging NGO observers and other key stakeholders from within and outside of the rubber value chain in the further development of this vital initiative.

Sincerely,



Kristin Urquiza
Deputy Director, Mighty Earth

Cc: TIP Member Representatives, NGO representatives, GM and BMW