

# Green Bay Packaging 2015 SFI Forest Management and Fiber Sourcing Recertification Audit Public Summary Report

The SFI Program of Green Bay Packaging Corp. (GBP) of Morrilton, Arkansas has demonstrated continuing conformance with the 2015-2019 Sustainable Forestry Initiative® Standards and Rules, Sections 2 and 3, according to the NSF SFIS Certification Audit Process.

NSF initially certified GBP to the SFIS on May 2, 2008 and recertified it on August 8, 2012. This report describes the Recertification Audit designed to focus on changes in the standard, changes in operations, the management review system, and efforts at continuous improvement. In addition, all of the SFI requirements were selected for detailed review.

Green Bay Packaging supplies wood fiber to two manufacturing operations located in Morrilton Arkansas. The company manages approximately 263,756 acres of timberland in Arkansas and Oklahoma. Loblolly pine sawtimber and pulpwood are the primary timber types. Green Bay Packaging's SFI Program is managed by Scott Meek.

The Recertification Audit was performed by NSF on July 28-30, 2015 by an audit team headed by Norman Boatwright, Lead Auditor. Audit team members fulfill the qualification criteria for conducting SFIS Certification Audits contained in the Sustainable Forestry Initiative® Audit Procedures and Qualifications (SFI APQ). The objective of the audit was to assess conformance of the firm's SFI Program to the requirements of the 2015-2019 Sustainable Forestry Initiative® Standard and Rules, Sections 2 and 3.

The scope of the SFIS Audit included fee timberland and procurement operations. Forest practices that were the focus of field inspections included those that have been under active management since August 2014. In addition, practices conducted earlier were also reviewed as appropriate (regeneration and BMP issues, for example). Procurement operations were also reviewed to ensure that SFI Procurement Standards were met. SFI obligations to promote sustainable forestry practices, to seek legal compliance, and to incorporate continual improvement systems were also within the audit scope.

As with the initial certification, several of the SFI Performance Measures were outside of the scope of the GBP's SFI program and were excluded from the scope of the SFI Certification Audit as follows:

For Section 2 - Forest Management:

- Core Indicator 2.1.3 Planting of exotic tree species
- Core Indicator 2.5.1 Research of improved planting stock
- Core Indicator 10.1.2 Research on genetically improved trees
- Core Indicator 11.1.5 Written agreements for the use of qualified logging professionals
- Core Indicator 11.2.3 Logger certification programs
- Objective 13 Public land management responsibilities

For Section 3 – Fiber Sourcing:

- Core Indicator 4.1.5 Program to address significant risk of illegal logging
- Core Indicator 5.2.2 Research on genetically engineered trees
- Core Indicator 6.2.3 Logger certification programs
- Objective 8 Public land management responsibilities

No indicators were modified.

## **SFIS Recertification Audit Process**

The review was governed by a detailed audit protocol designed to enable the audit team determine conformance with the applicable SFI requirements. The process included the assembly and review of audit evidence consisting of documents, interviews, and on-site inspections of ongoing or completed forest practices. Documents describing these activities were provided to the auditor in advance, and a sample of the available audit evidence was designated by the auditor for review. A sample of procurement and land management operations since the last surveillance audit was also reviewed to ensure that SFI Standard was met.

The possible findings for specific SFI requirements included Exceptional Practices, Full Conformance, Major Non-conformance, Minor Non-conformance and Opportunities for Improvement.

## **Overview of Audit Findings**

GBP's SFI Program was found to be in conformance with the 2015-2019 SFI Standards and Rules, Sections 2 and 3. The NSF Audit team determined that there was a transitional minor nonconformance for Section 3:

*CI 6.1.5 Program Participants shall have written agreements for the use of qualified logging professionals and/or certified logging professionals (where available) and/or wood producers that have completed training programs and are recognized as qualified logging professionals.*

Finding: Gatewood suppliers are required to sign a Fiber Purchase Contract. This document does not have any reference to logger training.

Three opportunities for improvement was identified:

For Section 2:

CI 3.2.3 There is an opportunity to improve the implementation of plans to manage and protect rivers, streams, lakes, wetlands, other water bodies and riparian areas.

CI 5.3.3 There is an opportunity to improve the identification of the alternative method used to justify the performance measure.

For Section 5:

PM 3.4 There is an opportunity to improve the off-product label use.

Several areas were identified that exceed the Standard requirements:

For Section 2:

CI 9.2.2 The Company's process to respect the rights of workers is exemplary.

For Section 3:

CI 2.2.1 The Company's has an excellent process for summarizing BMP implementation data and developing logger training to address issues identified.

CI 7.1.2 The Company's development of its own landowner brochure and Trees for the Future Program clearly exceed the requirement.

This finding does not indicate a current deficiency, but served to alert Green Bay Packaging to an area that could be strengthened or which could merit future attention.

No non-conformances were identified during the 2014 audit. The next Surveillance Audit is scheduled for July 26-28, 2016.

### **General Description of Evidence of Conformity**

NSF's audit team used a variety of evidence to determine conformance. A general description of this evidence is provided below, organized by SFI Objective.

#### **Section 2:**

**Objective 1. Forest Management Planning** - To ensure forest management plans include long-term sustainable harvest levels and measures to avoid forest conversion. The Company is using Area Regulation and harvest levels are well below growth.

**Summary of Evidence** – The Company's forest management plan and supporting documentation and the associated inventory and growth data were the key evidence of conformance

**Objective 2. Forest Health and Productivity** -To ensure long-term forest productivity, carbon storage and conservation of forest resources through prompt reforestation, afforestation, minimized chemical use, soil conservation, and protecting forests from damaging agents.

**Summary of Evidence** – Field observations and associated records were used to confirm practices. The Company has a program for reforestation, for protection against insects and diseases and wildfire, and for careful management of activities which could potentially impact soil and long-term productivity.

**Objective 3. Protection and Maintenance of Water Resources** - To protect the water quality of rivers, streams, lakes, wetlands and other water bodies through meeting or exceeding best management practices.

**Summary of Evidence** – Field observations of a range of sites were the key evidence. Auditor visited portions of many field sites that were proximate to water resources.

**Objective 4. Conservation of Biological Diversity** - To manage the quality and distribution of wildlife habitats and contribute to the conservation of biological diversity by developing and implementing stand- and landscape-level measures that promote a diversity of types of habitat and successional stages, and the conservation of forest plants and animals, including aquatic species, as well as threatened and endangered species, Forests with Exceptional Conservation Value, old-growth forests and ecologically important sites.

**Summary of Evidence** – Field observations, written plans and policies, use of a college-trained field biologist, availability of specialists, and regular staff involvement in conferences and workshops that cover scientific advances were the evidence used to assess the requirements involved biodiversity conservation.

**Objective 5. Management of Visual Quality and Recreational Benefits** - To manage the visual impact of forest operations and provide recreational opportunities for the public.

**Summary of Evidence** – Field observations of completed operations were assessed during the evaluation.

**Objective 6. Protection of Special Sites** - To manage lands that are geologically or culturally important in a manner that takes into account their unique qualities.

**Summary of Evidence** – Field observations of completed operations and records of special sites were all assessed during the evaluation.

**Objective 7. Efficient Use of Fiber Resources** - To minimize waste and ensure the efficient use of fiber resources.

**Summary of Evidence** – Field observations of completed operations, contract clauses, and discussions with supervising

field foresters provided the key evidence.

**Objective 8. Recognize and Respect Indigenous Peoples' Rights** -To recognize and respect Indigenous Peoples' rights and traditional knowledge.

**Summary of Evidence** – The Company's attempts to solicit input from Indigenous Peoples provided the key evidence.

**Objective 9. Legal and Regulatory Compliance** - To comply with applicable federal, provincial, state and local laws and regulations.

**Summary of Evidence** – Field reviews of ongoing and completed operations were the most critical evidence. Regulatory organizations contacted included the Alabama Forestry Commission.

**Objective 10. Forestry Research, Science and Technology** -To invest in forestry research, science and technology, upon which sustainable forest management decisions are based and broaden the awareness of climate change impacts on forests, wildlife and biological diversity.

**Summary of Evidence** – The Company's investment in forest research and attention to biodiversity provided the key evidence.

**Objective 11. Training and Education** - To improve the implementation of sustainable forestry practices through appropriate training and education programs.

**Summary of Evidence** – Confirmed by the Company's financial and physical support of the NCASI and its development of education and logger training programs.

**Objective 12. Community Involvement and Landowner Outreach** - To broaden the practice of sustainable forestry through public outreach, education, and involvement, and to support the efforts of SFI Implementation Committees.

**Summary of Evidence** – Confirmed by the financial and physical support of the Arkansas SIC and its development of handouts for forest landowners.

**Objective 13. Public Land Management Responsibilities** - To participate and implement sustainable forest management on public lands.

**Summary of Evidence** – Not applicable.

**Objective 14. Communications and Public Reporting** - To increase transparency and to annually report progress on conformance with the SFI Forest Management Standard.

**Summary of Evidence** – Confirmed audit report was filed on time with SFI Inc.

**Objective 15. Management Review and Continual Improvement** - To promote continual improvement in the practice of sustainable forestry by conducting a management review and monitoring performance.

**Summary of Evidence** – Records of program reviews, agendas and notes from management review meetings.

### **For Section 3:**

**Objective 1. Biodiversity in Fiber Sourcing** - To address the practice of *sustainable forestry* by conserving *biological diversity*.

**Summary of Evidence** – Review of records, interviews with landowners and participation in the AR SIC.

**Objective 2. Adherence to Best Management Practices** - To broaden the practice of *sustainable forestry* through the use of *best management practices* to protect water quality.

**Summary of Evidence** – Field observations, review of BMP monitoring records and state BMP audits.

**Objective 3. Use of Qualified Resource and Qualified Logging Professionals** - To encourage forest landowners to utilize the services of *qualified logging professionals, certified logging professionals* (where available) and *qualified resource professionals*.

**Summary of Evidence** – Training records of selected personnel, records associated with harvest sites audited, and landowner interviews were the key evidence for this objective.

**Objective 4. Legal and Regulatory Compliance** - To comply with applicable federal, provincial, state and local laws and regulations.

**Summary of Evidence** – Field reviews of ongoing and completed operations were the most critical evidence. Regulatory organizations contacted included the Arkansas Forestry Commission.

**Objective 5. Forestry Research, Science and Technology** - To invest in *forestry* research, science and technology, upon which sustainable forest management decisions are based and broaden the awareness of *climate change* impacts on forests, *wildlife* and *biological diversity*.

**Summary of Evidence** – Confirmed by review of records that the Company has sponsored forestry research.

**Objective 6. Training and Education** - To improve the implementation of *sustainable forestry* practices through appropriate training and education *programs*.

**Summary of Evidence** – Confirmed by the Company’s financial and physical support of the AR SIC and its development of education and logger training programs.

**Objective 7. Community Involvement and Landowner Outreach** - To broaden the practice of *sustainable forestry* through public outreach, education, and involvement and to support the efforts of *SFI Implementation Committees*.

**Summary of Evidence** – Confirmed by the Company’s financial and physical support of the AR SIC and its development of handouts for forest landowners.

**Objective 9. Communications and Public Reporting** - To increase transparency and to annually report progress on conformance with the *SFI Fiber Sourcing Standard*. .

**Summary of Evidence** – Confirmed audit report was filed on time with SFI Inc. and that the Company maintains copies of previous reports.

**Objective 10. Management Review and Continual Improvement** - To promote continual improvement in the practice of *sustainable forestry* by conducting a management review and monitoring performance.

**Summary of Evidence** – Records of program reviews, agendas and notes from management review meetings, internal audits and interviews with personnel from all involved levels in the organization were assessed.

### Relevance of Forestry Certification

Third-party certification provides assurance that forests are being managed under the principles of sustainable forestry, which are described in the Sustainable Forestry Initiative Standard as:

#### **1. Sustainable Forestry**

To practice sustainable forestry to meet the needs of the present without compromising the ability of future generations to meet their own needs by practicing a land stewardship ethic that integrates reforestation and the managing, growing, nurturing and harvesting of trees for useful products and ecosystem services such as the conservation of soil, air and water quality, carbon, biological diversity, wildlife and aquatic habitats, recreation and aesthetics.

#### **2. Forest Productivity and Health**

To provide for regeneration after harvest and maintain the productive capacity of the forest land base, and to protect and maintain long-term forest and soil productivity. In addition, to protect forests from economically or environmentally undesirable levels of wildfire, pests, diseases, invasive exotic plants and animals and other damaging agents and thus maintain and improve long-term forest health and productivity.

### **3. Protection of Water Resources**

To protect water bodies and riparian areas, and to conform with forestry best management practices to protect water quality.

### **4. Protection of Biological Diversity**

To manage forests in ways that protect and promote biological diversity, including animal and plant species, wildlife habitats, and ecological or natural community types.

### **5. Aesthetics and Recreation**

To manage the visual impacts of forest operations, and to provide recreational opportunities for the public.

### **6. Protection of Special Sites**

To manage lands that are ecologically, geologically or culturally important in a manner that takes into account their unique qualities.

### **7. Responsible Fiber Sourcing Practices in North America**

To use and promote among other forest landowners sustainable forestry practices that are both scientifically credible and economically, environmentally and socially responsible.

### **8. Legal Compliance**

To comply with applicable federal, provincial, state, and local forestry and related environmental laws, statutes, and regulations.

### **9. Research**

To support advances in sustainable forest management through forestry research, science and technology.

### **10. Training and Education**

To improve the practice of sustainable forestry through training and education programs.

### **11. Community Involvement and Social Responsibility**

To broaden the practice of sustainable forestry on all lands through community involvement, socially responsible practices, and through recognition and respect of Indigenous Peoples' rights and traditional forest-related knowledge.

### **12. Transparency**

To broaden the understanding of forest certification to the SFI Standard by documenting certification audits and making the findings publicly available.

### **13. Continual Improvement**

To continually improve the practice of forest management, and to monitor, measure and report performance in achieving the commitment to sustainable forestry.

### **14. Avoidance of Controversial Sources including Illegal Logging in Offshore Fiber Sourcing**

**(Applies only to the SFI 2015-2019 Fiber Sourcing Standard)**



To avoid wood fiber from illegally logged forests when procuring fiber outside of North America, and to avoid sourcing fiber from countries without effective social laws.

*Source: Sustainable Forestry Initiative® (SFI) Standard, 2015–2019 Edition*

