



## **Packaging Corporation of America 2013b SFI Summary Recertification Audit Report**

The SFI Program of the Packaging Corporation of America (PCA) of Valdosta, Georgia has achieved conformance with the SFI Standard®, 2010-2014 Edition, according to the NSF-ISR SFIS Certification Audit Process.

PCA was initially certified as Northern and Southern Regions in 2007, combined into a single certificate and recertified in 2011. This report describes the second 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 SFI requirements were selected for detailed review.

PCA procures wood in the resident state of each mill as well as adjacent states. A variety of wood is procured based on mill location and includes pine, hardwood and sawmill residual chips. The Michigan and Wisconsin mills produce corrugated medium while the Georgia and Tennessee mills produce linerboard. The SFI Program is coordinated by Don Pope.

The recertification audit was performed by NSF-ISR on November 5-7, 2013 at the Counce, TN facility and on January 13-15, 2014 at the Tomahawk, WI facility by an audit team headed by Norman Boatwright, Lead Auditor. Audit team members fulfill the qualification criteria for conducting SFIS Certification Audits of “Section 9. SFI 2010-2014 Audit Procedures and Auditor Qualifications and Accreditation” contained in Requirements for the SFI 2010-2014 Program: Standards, Rules for Label Use, Procedures, and Guidance.

The objective of the audit was to assess conformance of the firm’s SFI Program to the requirements of the Sustainable Forestry Initiative® Standard, 2010-2014 Edition.

The scope of the SFIS Audit included procurement operations only. Forest practices that were the focus of field inspections included those that have been conducted since the previous field audit conducted in February 2013. A sample of procurement operations since that time was also reviewed to ensure that SFI Procurement Standards were met. In addition, all the of SFI obligations to promote sustainable forestry practices, to seek legal compliance, and to incorporate continual improvement systems were reexamined during the audit. Use of the SFI logo and the requirement to provide a public of audit reports were also reviewed.

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

- Objectives 1 - 7 Land Management
- Objectives 11 - 13 Fiber Sourcing outside Canada and the US
- Core Indicator 14.2.2 Forestry enterprises
- Core Indicator 15.1.2 Research on genetically engineered trees

- Core Indicator 16.1.5 Forestry Enterprises
- Objective 18 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.

During the audit NSF-ISR reviewed a sample of the written documentation assembled to provide objective evidence of SFIS Conformance. NSF-ISR also randomly selected a sample of field sites for inspection and requested that PCA foresters pick additional sites based upon the risk of environmental impact, likelihood of occurrence, special features, and other criteria outlined in the NSF-ISR SFI-SOP. NSF-ISR also selected and interviewed stakeholders such as contract loggers, landowners and other interested parties, and interviewed employees within the organization to confirm that the SFI Standard was understood and actively implemented.

The possible findings for specific SFI requirements included Full Conformance, Major Non-conformance, Minor Non-conformance, Opportunities for Improvement, and Practices that exceeded the Basic Requirements of the SFIS.

### **Overview of Audit Findings**

PCA's SFI Program was found to be in conformance with the SFIS Standard with no non-conformances or opportunities for improvement. No issues were identified during the previous audit.

NSF-ISR also identified the following areas where forestry practices and operations for procurement of fiber for Company's mills exceed the basic requirements of the SFI Standard:

- 10.2.2 *Use of information from the verifiable monitoring system to maintain rates of conformance to best management practices and to identify areas for improved performance. The Company's efforts to monitor BMP implementation and to identify areas for improved performance is exemplary.*
- 17.2.1 *Periodic educational opportunities promoting sustainable forestry.* The Company's efforts included mill tours, teacher workshops and youth events and is exemplary.

The next surveillance audit is scheduled for October 2014.

## **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.

**Objective 8. Landowner Outreach** - To broaden the practice of sustainable forestry by forest landowners through fiber sourcing programs.

**Summary of Evidence** – Interviews with staff and landowners and review of programs offered (brochures on file) were used to confirm these requirements.

**Objective 9. Use of Qualified Resource and Qualified Logging Professionals** - To broaden the practice of sustainable forestry by encouraging forest landowners to utilize the services of forest management and harvesting professionals.

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

**Objective 10. 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 and review of BMP monitoring records were the primary evidence used to assess adherence to BMPs.

**Objective 14. Legal and Regulatory Compliance** - Compliance 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 Wisconsin DNR.

**Objective 15. Forestry Research, Science, and Technology** - To support forestry research, science, and technology, upon which sustainable forest management decisions are based.

**Summary of Evidence** – Financial records were confirmed by contacting the recipients of research support.

**Objective 16. Training and Education** - To improve the implementation of sustainable forestry practices through appropriate training and education programs.

**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 17. Community Involvement in the Practice of Sustainable Forestry** -

To broaden the practice of sustainable forestry by encouraging the public and forestry community to participate in the commitment to sustainable forestry, and publicly report progress.

**Summary of Evidence** – Mailing lists, agendas for meetings, and selected summaries of comments were sufficient to assess the requirements.

**Objective 19. Communications and Public Reporting** - To broaden the practice of sustainable forestry by documenting progress and opportunities for improvement.

**Summary of Evidence** – Reports filed with SFI Inc. and the SFI Inc. website provided the key evidence.

**Objective 20. Management Review and Continual Improvement** - To promote continual improvement in the practice of sustainable forestry, and to monitor, measure, and report performance in achieving the commitment to sustainable forestry.

**Summary of Evidence** – Records of program reviews, agendas and notes from management review meetings, 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 zones, and to conform with 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 forests and lands of special significance (ecologically, geologically or culturally important) in a manner that protects their integrity and 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. Avoidance of Controversial Sources including Illegal Logging in Offshore Fiber Sourcing**

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.

**9. Legal Compliance**

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

**10. Research**

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

**11. Training and Education**

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

**12. Public Involvement**

To broaden the practice of sustainable forestry on public lands through community involvement.

**13. Transparency**

To broaden the understanding of forest certification to the SFI 2010-2014 Standard by documenting certification audits and making the findings publicly available.

**14. Continual Improvement**

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

*Source: Sustainable Forestry Initiative® (SFI) Standard, 2010-2014 Edition*

**For Additional Information Contact:**

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