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SFI-00001

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Stuwix Resources Joint Venture

November 12, 2015

Gina McCarthy, Administrator
Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Dear Administrator McCarthy:

I am writing in regards to EPA's Recommendations for Specifications, Environmental Performance Standards, and Ecolabels for Federal Procurement, published in the Federal Register on September 25, 2015. I am specifically concerned with the recommendation for lumber and wood in construction, which recommends products that are Forest Stewardship Council (FSC) certified but excludes Sustainable Forestry Initiative® (SFI) certification.

The FR Notice states that "EPA will be initially using specifications, standards and labels information developed by other federal agencies to identify products that have verified sustainability attributes, are readily available in the market, and meet cost and performance needs." The recommendation for lumber and wood is apparently based on the Department of Energy's (DOE's) FY16 Priority Products List, and SFI was directed to reach out to DOE about this position.

When SFI contacted the DOE Sustainable Acquisition Program inquiring about DOE's recommendation, we were sent the following response:

"Concerning the U.S. Department of Energy setting FSC as a goal for wood and lumber, we try to set the most robust standard as the goal. At the time (2010) when we evaluated the standards available for wood and lumber, SFI did not specify third-party certification, and LEED at the time specified FSC so we selected FSC. We know that SFI now specifies third-party certification and see that this year SFI changed the standard. As we do whenever new/updated standards are issued, we will evaluate the standard to determine whether, for the purpose of the DOE GreenBuy Award, SFI should also be set as a goal for wood and lumber for FY2017."

I am writing to express my strong concern and disappointment over EPA's reliance on DOE for the Interim Recommendations, and to urge EPA to add "SFI certified" to the list of standards recognized for wood and lumber, for the following reasons:

- 1. The exclusion of the SFI Standard is not based on fact;**
- 2. Using the LEED rating system as the basis to recognize FSC and exclude SFI unjustly relies on a single non-government system, and ignores positions of numerous government agencies and other bodies;**
- 3. There does not appear to have been a fair and transparent process in determining which standards to recognize for wood and lumber.**

The exclusion of the SFI standard is not based on fact. DOE’s statement that SFI did not specify third-party certification in 2010 is simply not true. SFI has been requiring third-party certification for companies to make claims about certified supply since 2002, with the release of the 2002-2004 SFI Standard. In the section on “Verification/Certification Principles and Procedures”, the term certification is used “to denote independent third-party verification”. The SFI program has evolved considerably since that time, certainly by 2010, and even more so to the present day.

SFI Inc. is an independent, nonprofit 501(c)(3) organization that is solely responsible for maintaining, overseeing and improving the internationally recognized SFI program. SFI Inc. is governed by an 18-member board of directors with three chambers representing environmental, economic and social interests equally. Across the United States and Canada, over 260 million acres are certified to the SFI forest management standard. Certification to all three SFI Standards – Forest Management, Fiber Sourcing and Chain-of-Custody – requires third-party audits by independent and accredited certification bodies. Certification bodies are independently accredited by the American National Standards Institute (ANSI), ANSI-ASQ National Accreditation Board (ANAB), or the Standards Council of Canada (SCC), all of which are members of the International Accreditation Forum and conform to the ISO 17021:2011 or the ISO 17065:2012 Conformity Assessment Standards.

The SFI Standard requires, among other things, that harvest levels are sustainable, biodiversity and old growth are conserved, water quality and wildlife habitat are protected, harvested areas are replanted promptly, chemical use is minimized, and the rights of local communities and tribal interests are considered and respected. Furthermore, the SFI Standard not only addresses all of the sustainability criteria that the FSC standard covers, but goes far beyond that by promoting responsible forest management on all suppliers’ lands, through our Fiber Sourcing Standard.

Using the LEED rating system as the basis to recognize FSC and exclude SFI unjustly relies on a single non-government system, and ignores positions of numerous government agencies and other bodies. The following are a small sample of government agencies (U.S. and other countries) that have recognized the sustainability attributes and credibility of the SFI Standard. These provide ample justification for including SFI among the standards that should be recognized for wood and lumber in construction.

Examples of government recognition of SFI in the United States:

- The [USDA BioPreferred](#) program, as reauthorized and expanded in the 2014 Farm Bill, includes mandatory purchasing requirements for federal agencies, which EPA has acknowledged. The Conference Report for the 2014 Farm Bill noted that “innovative approaches for forest products include, but are not limited to, sourcing fiber from non-controversial, responsible or certified sources identified in the ASTM 7612–10 standard” – which lists SFI among its recognized forest certification standards.
- A [USDA news release](#) from Secretary Vilsack documenting the environmental benefits of wood in construction noted, “Sustainability of forest products can be verified using any credible third-party rating system, such as Sustainable Forestry Initiative, Forest Stewardship Council or American Tree Farm System certification.”
- GSA’s [Solicitation for Offers](#) section 7.4 states: “For all new installations of wood products, the Lessor is encouraged to use independently certified forest products. For information on certification and certified wood products, refer to ... the Forest Stewardship Council United States (fscus.org), or the Sustainable Forestry Initiative (sfiprogram.org).”
- The [Department of Education](#), in the evaluation criteria for its Green Ribbon Schools recognition program, indicates: “Office paper is composed of recycled content in accordance with EPA’s Comprehensive Procurement Guide, the Forest Stewardship Council, Sustainable Forestry Initiative, American Tree Farm System or comparable certification standard.”
- The [National Association of State Foresters](#) resolution on forest certification states, “Forest certification is one tool for promoting sustainable forestry practices. The American Tree Farm System (ATFS), the Forest

Stewardship Council (FSC), and the Sustainable Forestry Initiative (SFI) are examples of forest certification programs that can make positive contributions to our nation’s public and private forests...Public and private sector requirements for certification should recognize ATFS, FSC, SFI, and all other credible options.”

Examples of government recognition of SFI in other countries:

- [Public Works and Government Services Canada](#) requires “all wood products used in its building projects to be certified under one of the three certification systems that operate in Canada: the Canadian Standards Association Sustainable Forest Management Standard, the Forest Stewardship Council’s system or the Sustainable Forestry Initiative’s system. The department believes all three of these systems effectively promote more sustainable management of Canada’s forest resources.”
- The [Canadian Council on Forest Ministers](#) stated that “Governments in Canada accept that these standards (Canadian Standards Association, FSC and SFI) demonstrate, and promote the sustainability of forest management practices in Canada. ...Customers can be assured that these forest certification standards (Canadian Standards Associations, FSC and SFI) are complementary to and demonstrate each Government’s sustainable forest management regime.”
- The [UK Central Point of Expertise on Timber](#) (CPET) evaluated SFI and confirmed that the SFI program was among those that met the UK government’s requirements for “legality and sustainability”.

SFI is working constructively and directly with the US Green Building Council to address their current exclusion of SFI. However, there are many credible green building rating systems that recognize the value of multiple forest certification standards, and offer credits for products certified to these forest certification standards, including SFI:

RATING SYSTEM	LOCATION	RECOGNIZES ALL CREDIBLE CERTIFICATION PROGRAMS (INCLUDING SFI)
 ANSI/GBI 01-2010: Green Building Assessment Protocol for Commercial Buildings		YES
 ANSI/ICC 700-2012: National Green Building Standard		YES
 ASHRAE - Standard 189.1		YES
 ASTM - D7612-10		YES
 BIFMA e3-2010: Furniture Sustainability Standard		YES
 BREEAM		YES
 Built Green Program		YES
 CASBEE		YES
 Composite Panel Association Log		YES
 Green Globes		YES
 Green Star Program		YES
 International Green Construction Code		YES

Furthermore, numerous Members of Congress have sent letters over the past several years to federal agencies over which they have jurisdiction, raising concerns over the reliance on LEED and LEED's discrimination against domestic wood products as compared to foreign products. These include a July 2012 letter from Senators Baucus (D-MT) and Vitter (R-LA) to the Secretaries of DOD, DOE, and GSA, which states, "The federal government should adopt a [green building] system that promotes the use of any and all responsibly produced domestic wood products, such as those certified by SFI and ATFS." A letter sent by the Mississippi delegation in 2011 to the Secretary of the Navy states "...the LEED-only policy does not adequately allow consideration of all recognized forest certification schemes, nor of environmental performance demonstrated through lifecycle analysis. We believe there may be better avenues for incorporating wood products into military construction while meeting your environmental sustainability goals."

There does not appear to have been a fair and transparent process in determining which standards to recognize for wood and lumber. The publication of the EPA Interim Recommendations in September stands in direct contrast to the process that EPA has been using to develop guidelines for federal purchasing, in which SFI has been consistently and directly engaged over the last five years.

SFI developed and submitted comments in October 2010 during the "Advancing Sustainable Products" federal comment period; participated in workshops and listening sessions about the EPA/GSA interagency product labeling workgroup from 2010-2013; developed and submitted comments in April 2014 on the Draft Guidelines for Product Environmental Performance Standards and Ecolabels for Voluntary Use in Federal Procurement; and applied to and was accepted on the Flooring panel (currently in process) as part of the pilot phase to test and refine the draft guidelines.

In contrast, at no time during the last five years has SFI been aware of any opportunity to comment on DOE's choice of the FSC standard for wood and lumber. And yet EPA has chosen to rely solely on a DOE recommendation that is based on numerous errors about SFI and ignores myriad other government agencies that put forth a position that recommends SFI recognition for federal purchasing. Furthermore, with almost 90% of FSC certifications located outside the U.S., this new EPA position puts the U.S. government in a position where they are saying "Yes" to FSC wood from Russia, China, and Brazil, and saying "No" to SFI wood from right here in the U.S., a quarter of which is located on state-owned forest lands.

The Federal Register notice does not provide any opportunity for comment; however, we feel the exclusion of SFI should be corrected immediately, as it directly and immediately impacts federal purchasing and indirectly impacts non-government purchasing. We strongly urge you to add "SFI certified" to the list of standards recognized for wood and lumber.

I would appreciate the opportunity to meet in person to discuss this further, and hope we can do so during the week of November 16. I will follow up by phone to schedule a meeting.

Regards,



Kathy Abusow
President and CEO