

Setting The Record Straight: SFI Counters ForestEthics' Misleading Claims

May 2, 2013 – The Sustainable Forestry Initiative® Inc. (SFI®) is dedicated to responsible forestry and works with thousands of individuals and hundreds of organizations across North America to implement and improve best management practices for water quality, to conduct important conservation research, to train loggers in responsible forestry and work with landowners on habitat management for a wide variety of species. We are supported by government, academic and conservation agencies in the U.S., Canada and internationally, we partner with well-known conservation groups, and we work with academic institutions – all to ensure forests remain healthy and vibrant and that they are harvested and regenerated in a responsible manner. Our goal is healthy, thriving well-managed forests for today and for future generations to come.

It is unclear to us what ForestEthics' goal is. We believe they are threatening companies that buy paper, wood and packaging products, and we know they are misrepresenting our program. We know they have received funds to promote FSC and we know they have received funds to undermine SFI. We know that they have utilized photos from natural disasters to inaccurately portray these unfortunate events as SFI current practices. We know they are behaving irresponsibly and we know they are undermining the good work of both SFI and FSC, as many buyers are growing tired of Forest Ethics, and by association, the important topic of forest certification.

It is unfortunate that ForestEthics has spent hundreds of thousands of dollars to harass companies to choose FSC rather than SFI, when both programs are part of the solution. ForestEthics misrepresented the truth citing 24 examples (over the past two years) of companies disassociating themselves with SFI. To put that number in perspective, SFI receives 24 requests to use the SFI label *every business day*, on average – more than 6,000 requests in 2012.

We know that Office Depot, and the overwhelming majority of organizations that ForestEthics names in their releases continue to purchase SFI paper products and continue to recognize the value of our program and continue to purchase paper certified to the SFI standard. We know that many of these organizations would like to see these campaigns come to an end because they recognize they are undermining numerous institutions that are working hard to promote responsible forestry and are misrepresenting the views of corporations and the forestry practices and claims associated with the SFI program.

What large corporations in the supply chain understand is that we need more responsible forestry, not less. These corporations also understand that regardless of a company's decision about which certification label to put on a product, the supply chain is mixed: SFI content is found in FSC-labeled products and vice versa. They see the value of both of our certification programs and often prefer some aspects of one program over another, but they do not disassociate themselves from responsible forestry and therefore they do not disassociate themselves with the Sustainable Forestry Initiative or the Forest Stewardship Council. However, that day will come if these campaigns persist, and the good work of thousands of individuals working to provide clean water, thriving forests, wildlife habitat, strong communities and jobs will be compromised.

SFI's recognition and support are growing because these stakeholders understand that the future of our forests depends on the actions we take today, and that SFI's independent, rigorous and science-based standard is improving conditions in forests across North America every day. That's why SFI has become the world's largest single forest certification standard, with over 200 million acres in North America certified to the SFI Standard. And SFI continues to raise the bar by requiring that program participants invest in conservation research – with \$1.3 billion invested since 1995.

ForestEthics' anti-SFI attack campaign is ineffective and misleading, and it wastes resources that would be much better used to promote forest conservation. We urge them to put their dollars to good use and work with us or other organizations on real projects that promote real conservation benefits in our forests. We invite ForestEthics to stop misleading people and instead join SFI and hundreds of thousands of stakeholders around the world who are working day in and day out to advance the cause of sustainable forestry. Forest Ethics, like any individual or organization are welcome and encouraged to participate in the SFI Standard revision process which will be launched this summer and includes at least two 60 day public comment periods, numerous public workshops, a transparent comment and response process and an external review panel to vet our standard revision process.

Learn more about SFI and get the facts at [http://www.sfiprogram.org/get-the-facts/What Others are Saying about SFI](http://www.sfiprogram.org/get-the-facts/What%20Others%20are%20Saying%20about%20SFI) (2.5 min video clip): <http://www.youtube.com/watch?v=Oup-kflp3qg&feature=youtu.be>

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Working with Conservation Groups

ForestEthics Position	SFI Position
<p>ForestEthics claims SFI's program is not supported by conservation groups.</p>	<p>SFI is honored to work with conservation organizations who share our goals, and are involved in science-based projects to improve forest practices and build knowledge. Much of this work also helps to strengthen the SFI Standard and its implementation. In 2010, we introduced the SFI Conservation and Community Partnerships Grant Program, which has already led to impressive results.</p> <p>The SFI board's three-chamber structure represents environmental, social and economic interests equally. The six members of the board's conservation chamber represent highly respected and science-based conservation organizations. Earlier this year, they issued an open letter regarding ForestEthics, which said: "Groups that spread misinformation about SFI could well be harming the forest environment. SFI provides a tremendous amount of on-the-ground conservation value – a value North Americans care deeply about."</p>

Backed by Respected Organizations

ForestEthics Position	SFI Position
<p>ForestEthics claims SFI is not an independent eco-label with high environmental and social standards.</p>	<p>Respected organizations from government agencies to consumer advocacy groups to independent research organizations have determined that SFI is a credible standard. For more, see: SFI: What Others are Saying.</p> <p>The cornerstone of the SFI program is third-party certification, which verifies the requirements set out in the standard have been met. Independent certification bodies evaluate planning, procedures and processes in the forest, in the mill or in the plant to ensure they conform to SFI requirements.</p> <p>The independent SFI Board of Directors is totally responsible for the SFI program – its 18 volunteer members set and implement the forest certification standard following a public review process, and it is the only body that can modify the standard.</p> <p>The SFI program only certifies lands in the United States and Canada, where social concerns are addressed through extensive forest regulations, effective enforcement and an open, democratic governance system.</p> <p>SFI program participants must comply with social laws, such as those covering civil rights, equal employment opportunities, anti-discrimination and anti-harassment measures, workers' compensation, indigenous peoples' rights, workers' and communities' right to know, prevailing wages, workers' right to organize, and occupational health and safety.</p> <p>Respected organizations recognize SFI certification, including the Canadian Council of Forest Ministers, the Programme for the Endorsement of Forest Certification and the National Association of State Foresters. The United Kingdom's Central Point of Expertise on</p>

	<p>Timber has confirmed the SFI program was among those that meet its government's requirements for 'legality' and 'sustainability'. In its 2010 Sins of Greenwashing report, non-profit TerraChoice continues to count SFI among a limited list of 'legitimate' environmental standards and certifications.</p>
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Committed to Continuous Improvement

ForestEthics Position	SFI Position
<p>ForestEthics claims SFI represents status quo forestry.</p>	<p>The SFI program is committed to continuous improvement of responsible forest management. The SFI Standard's principles for sustainable forestry include: "Principle 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."</p> <p>The 2010-2014 Standard has 20 objectives, 38 performance measures and 115 indicators – up from 13 objectives, 34 performance measures, and 102 indicators in the previous standard.</p> <p>Audited objectives include:</p> <ul style="list-style-type: none"> • Objective 20 calls for continual improvement in the practice of sustainable forestry. • Objective 15 requires support for forest research, science and technology, upon which sustainable forest management decisions are based. These include emerging issues such as the ecological impacts of bioenergy feedstock removals and awareness of climate change impacts on forests, wildlife and biological diversity. <p>SFI and its partners continue to pilot new ideas so they can remain abreast of emerging conservation and marketplace issues.</p> <p>SFI Inc. completes a review of its standard and supporting documents every five years, which is consistent with international protocols for forest certification standard revision cycles. Each public review leads to additions to the standard, such as:</p> <ul style="list-style-type: none"> • The SFI 2010-2014 Standard improved conservation of biodiversity in North America and offshore; addressed emerging issues such as climate change and bioenergy; strengthened fiber sourcing requirements; and expanded requirements for logger training and support for trained loggers and certified logger programs. See: SFI Inc. Launches New Standard • The SFI 2005-2009 Standard included new provisions to conserve old-growth forests and imperiled/critically imperiled species; to strengthen procurement from jurisdictions outside of North America and supply chain monitoring; and to address invasive exotic species. It also introduced new performance

	<p>measures and indicators related to the certification of public forestlands, including requirements to confer with affected indigenous peoples.</p> <ul style="list-style-type: none"> • The 2002-2004 Standard introduced, among other things, measures to protect Forests with Exceptional Conservation Value, and provisions to help prevent illegal logging and to promote the conservation of biodiversity hotspots and major tropical wilderness areas. <p>Recent reports show the SFI program has led to consistent improvements in best management practices to protect water quality. For more, see: SFI Community Outreach.</p> <p>In its 2010 National Report on Sustainable Forests, the U.S. Forest Service highlighted several areas where certification and the SFI Standard are helping to improve forest health and knowledge, including Indicator 7.60, which acknowledged that "forest certification standards, particularly the Sustainable Forestry Initiative, require demonstration of research."</p> <p>In its 2010 status report on forest certification, Dovetail Partners Inc. stated: "Significant changes have occurred within the major certification programs in recent years, and, in several ways, it is increasingly difficult to differentiate between certification systems in North America."</p>
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Open and Transparent

ForestEthics Position	SFI Position
<p>ForestEthics claims SFI funding is from the same forest products industry it claims to be policing.</p>	<p>Like other third-party forest certification programs, SFI receives fees from those that use its standard, which include landowners, land managers, forest product companies; state, provincial and county agencies; colleges and universities; as well as conservation and other non-profit organizations. These funds are used to strengthen forest practices and increase knowledge by supporting conservation partnerships and outreach across North America and beyond.</p> <p>SFI develops its standard through an open public process. SFI does not certify organizations as conforming to the Standard – that is done by independently accredited certification bodies.</p>
<p>ForestEthics claims SFI should be represented as a Trade Association or an IRS 501(c)(6) organization.</p>	<p>SFI Inc. is a registered charitable organization under section 501(c)(3) of the United States Internal Revenue Code. It is dedicated to ensuring the environmental, social, and economic sustainable development of forests. SFI has sole responsibility for all activities necessary for the development, maintenance, implementation, promotion, and continual improvement of the SFI Standard and Program.</p> <p>Every year, as required by law, SFI Inc. files tax returns with the</p>

	<p>Internal Revenue Service, which documents our activities and our funding.</p> <p>In 2002, the then-Sustainable Forestry Board submitted Form 1023 to be recognized for exemption under IRS Section 501(c)(3) as a non-profit. In 2007, when the organization was renamed SFI Inc., this was approved by the IRS.</p> <p>As noted in the SFI Inc. Transparency Policy, Form 1023 Application for Recognition of Exemption Under Section 501(c)(3) of the Internal Revenue Code, and the responding IRS Determination Letter are available upon request.</p>
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Third-Party Means Independent

ForestEthics Position	SFI Position
<p>ForestEthics claims SFI environmental standards are effectively unenforceable, and SFI fails to take responsibility for non-compliance.</p>	<p>Certification bodies must complete an accreditation program before they are approved to perform certification audits to the SFI Standard. Depending on the scope of the certification audit, they must have completed an accreditation program through one or more of the following independent, international accreditation bodies:</p> <ul style="list-style-type: none"> • American National Standards Institute (ANSI) • ANSI-ASQ National Accreditation Board (ANAB) • Standards Council of Canada (SCC) <p>Forest certification is voluntary, however, an organization that wants to make a claim about SFI certification must first have its operations audited by a third-party certification body.,</p>
<p>ForestEthics claims SFI tried to change the process when the Sierra Club made a complaint in 2009, and refer the complaint to ANSI.</p>	<p>SFI is a third-party, independent certification program. Its SFI Requirements: Section 11 – Public Inquiries and Official Complaints make it clear that SFI Inc. has an independent complaints process. Sierra Club was told this in 2009 when it filed the original complaint.</p> <p>Any concerns about certification decisions are brought forward to the third-party certification body and, if the findings are not satisfactory, the complainant can move to the higher authority, which is the body that accredited the certification body. These include the American National Standards Institute (ANSI), the ANSI-ASQ National Accreditation Board (ANAB) or the Standards Council of Canada (SCC). The accreditation body will then conduct its own investigation into the complaint as the highest authority. In addition, ANSI, ANAB and SCC are required to be members of the International Accreditation Forum, which also has complaints procedures and requirements.</p>

Responsible Sourcing

ForestEthics Position	SFI Position
<p>ForestEthics claims SFI's fiber sourcing label is misleading.</p>	<p>The SFI program has on-product labels to help customers and consumers identify exactly what they are buying: three SFI chain of custody labels and one SFI certified sourcing label. Learn more about SFI Labels and Claims.</p> <p>The SFI certified sourcing label and claim <u>do not make claims about certified forest content</u>. Certified sourcing can include fiber sourced from a company that conforms with objectives 8-20 of Section 2 - SFI 2010-2014 Standard's fiber sourcing requirements, from pre- or post-consumer recycled content, or from a certified forest, and fiber sourced from non-controversial sources.</p> <p>Certified sourcing is a defined term in the SFI Definitions (Section 13 of the SFI 2010-2014 Standard Requirements).</p> <p>Certified sourcing is defined as raw material sourced from the following sources confirmed by a certification body:</p> <ul style="list-style-type: none"> • Fiber that conforms with objectives 8-20 of Section 2 - SFI 2010-2014 Standard's fiber sourcing requirements. • Pre-Consumer Recycled Content: Material diverted from the waste stream during a manufacturing process. It does not include materials such as rework, regrind or scrap generated in a process and capable of being reclaimed within the same process. <p>Any claims about pre-consumer recycled content by Program Participants or label users shall be accurate and consistent with applicable law. Program Participants and label users are encouraged to consult the U.S. Federal Trade Commission's guidelines on environmental claims in product advertising and communication and the guidelines on environmental labeling and advertising issued by the Fair Business Practices Branch of Industry Canada's Competition Bureau, as appropriate, and to seek additional information and direction from national accreditation bodies, national standards bodies and national, state and provincial consumer protection and competition laws.</p> <ul style="list-style-type: none"> • Post-consumer recycled content: Material generated by households or by commercial, industrial and institutional facilities in their role as end-users of the product, which can no longer be used for its intended purpose. <p>Any claims about post-consumer recycled content by Program Participants and label users shall be accurate and consistent with applicable law. Program Participants and label users are encouraged to consult the U.S. Federal Trade Commission's guidelines on environmental claims in product advertising and communication and the guidelines on environmental labeling and advertising issued by the Fair Business Practices Branch of Industry Canada's Competition Bureau, as appropriate, and to seek additional information and direction from national accreditation bodies, national standards bodies, and national, state and provincial consumer protection and competition laws.</p>

	<ul style="list-style-type: none"> • Certified forest content, which includes content from specific forest tracts that are third-party certified to conform with the SFI 2010-2014 Standard's forest land management requirements (Objectives 1-7 and 14-20) or other acceptable forest management standards (e.g. CAN/CSA-Z809 and ATFS). • Non-controversial sources: If the raw material is sourced from outside of the United States and Canada, the organization shall establish adequate measures to ensure that the labeled products do not come from controversial sources. See Section 3, 3.6 and Section 4, 6.1 on the process to avoid controversial sources. Up to one third of the supply for secondary producers can come from non-controversial sources for use of the certified sourcing label; the other two-thirds must come from the sources defined under the certified sourcing definition— fiber that conforms with objectives 8-20 of Section 2, pre consumer fiber, post consumer fiber, and/or certified forest content. <p>In order to use the “Certified Sourcing” label, a primary producer must ensure 100% of the fiber comes from responsible fiber sources as defined in the SFI standard. A secondary producer must ensure that at least two-thirds of the fiber comes from responsible fiber sources as defined in the SFI standard, and the other one-third cannot come from controversial sources as defined in the SFI standard.</p> <p>For more information about SFI fiber sourcing requirements, see: SFI: Promoting Responsible Forest Management and Sourcing</p>
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Responsible Forestry is More Than Just a Photo

ForestEthics Position	SFI Position
ForestEthics misleads the public by using a photo of a natural disaster as an example of status quo forestry in the SFI program.	<p>The "poster child" for the ForestEthics anti-SFI campaign is a landslide which was the result of a once-in-500-years record rainfall in Washington State in 2007. The landslide had nothing to do with the SFI standard, and could have happened on any land – certified or not.</p> <p>Using a photograph of this natural disaster to characterize the SFI program is grossly misleading and illuminates the lengths to which ForestEthics will go to mislead the public.</p>
ForestEthics claims its members routinely report large clearcuts that have had significant negative impacts and that have often been approved by SFI.	<p>ForestEthics often uses visuals of clearcuts as an example of harmful practices in SFI-certified forests when in fact clearcutting can be a legitimate harvesting method accepted by most certification programs, including FSC. For example, visit this independent website for visuals of FSC clearcuts.</p> <p>The SFI Standard limits clearcuts except where necessary to meet regulatory requirements or respond to forest health emergencies or other natural catastrophes. There are no maximum clearcut sizes in</p>

	<p>many FSC standards, including those standards with the largest application in North America.</p> <p>Resource managers pay a great deal of attention to the aesthetic and environmental impacts of activities related to forest management, such as the protection of soils, water quality, wildlife habitat and other social and recreational values. They often plan harvesting activities in a manner that ensures individual trees and patches of trees are left throughout the harvest area to provide wildlife habitat and protect other forest values. This is addressed in Performance Measure 5.3 of the SFI 2010-2014 Standard.</p> <p>The SFI Standard requires program participants to identify and protect ecologically significant forests, including old-growth forests and Forests with Exceptional Conservation Value. Program participants are also required to protect threatened and endangered species, promote the conservation of native biological diversity, including species, wildlife habitats and ecological or natural community types at stand and landscape levels, and promote the conservation of biodiversity hotspots and high-biodiversity wilderness areas as defined by Conservation International.</p>
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Promoting Responsible Forest Management

ForestEthics Position	SFI Position
ForestEthics attempts to characterize SFI as a marketing scheme “seeking to profit” from the green market.	<p>First and foremost, SFI is about responsible forestry and always has been since the inception of the original program in 1995. Since 1995, SFI program participants have, among other things, invested over \$1.2 billion in forest research, and over \$57 million to support community programs such as education and training for 130,000+ loggers and foresters and outreach to family forest owners.</p> <p>It wasn't until 2002 that SFI produced an on-product label in response to marketplace and customer demand. The label allowed customers procuring fiber through the SFI program to showcase their commitment to consumers. SFI marketing and outreach is hinged on supporting responsible forestry - and this means recognizing all credible forest certifications. Our long-running campaign falls under the headline "Support Responsible Forestry: Buy Certified" and supports responsible forest practices on all forest lands. Who can argue with that?</p>

Independence and Governance

ForestEthics Position	SFI Position
ForestEthics misleads the public about the departure of SFI board	The truth is that SFI's board has regular departures because all of our board positions have term limits. Numerous organizations have

<p>members.</p>	<p>left the SFI board because they served full terms – including The Nature Conservancy, the American Bird Conservancy, and Conservation International. In fact, when Steve McCormick, then President and CEO of The Nature Conservancy, left the SFI board in 2007 he praised SFI's work during his term, saying "SFI has truly helped raise the forestry bar across the continent – by training thousands of loggers, by raising the profile of BMP's, and by making BMP implementation the norm. And SFI has done its part in the critical work of helping to conserve imperiled species and communities on program participant lands."</p> <p>It is also true that a few board members have left the board before their terms expired due to time constraints and one board member did leave the Board one month after being elected without participating in a board meeting or functioning in any role as a board member.</p>
<p>ForestEthics implies that SFI is too closely connected to industry and industry associations.</p>	<p>The reality is that like FSC, SFI has a three-chamber board of directors with equal representation from the environmental, social and economic sectors.</p> <p>The SFI program evolved since its creation in 1994 and completed the full departure from the AF&PA in 2007, becoming an independent non-profit charitable organization. Only one member of SFI's board of directors is also a member of the AF&PA and the SFI board does not have a seat dedicated to a member of the AF&PA.</p>

Transparency and Audits

ForestEthics Position	SFI Position
<p>ForestEthics claims the audit process for SFI forest certification is not rigorous.</p>	<p>The reality is that both SFI and FSC have independent third-party audits, and in many cases share the same auditing firms, meaning audits for SFI and for FSC are done by the same people with the same expertise and credibility. SFI develops standards; it does not perform audits. SFI requires program participants to use certification bodies that are independently accredited by ANSI, ANSI-ASQ National Accreditation Board and/or Standards Council of Canada.</p>
<p>ForestEthics asserts that the fact that SFI audit reports show only minor non conformances shows that the audits are weak or ineffective.</p>	<p>The reality is that SFI audit reports may note only minor non-conformances that must be addressed. Major non-conformances, however, mean that the company fails the audit and the land is not certified, so there is no audit report . In contrast, FSC audits often result in certifications despite several major non-conformances. SFI believes the standard must be met to achieve certification, whereas FSC takes a different approach, which explains why audit reports for FSC often show many major non-conformances.</p>