

## **The Westervelt Company 2015 Public SFI Recertification Audit Report**

The SFI Program of The Westervelt Company (TWC) in Tuscaloosa, Alabama has demonstrated continuing conformance with Section 2 of the Sustainable Forestry Initiative Standard® 2015-2019 Standards and Rules (SFIS), according to the NSF SFIS Certification Audit Process.

NSF initially certified Gulf States Paper Corporation (GSPC) to the SFIS in July 2004. GSPC has since changed its name to The Westervelt Company and was recertified in 2007 and 2012. This report describes the third Recertification Audit designed to focus on changes in the standard, changes in operations, the management review system, and efforts at continuous improvement. This audit included a detailed review of a sample of the SFI requirements.

TWC manages approximately four hundred ninety-eight thousand eight hundred sixty-one acres (502,229) of fee and long term lease land in Alabama, Georgia, Mississippi, South Carolina and Virginia. TWC operates a large pine sawmill and a cantor wood mill in Moundville, Alabama and a new pellet mill in Aliceville, Alabama and typically procures wood within a ninety mile radius of these facilities. Pine is the primary species utilized. TWC's SFI FM Program is managed by Jonathan Lowery.

The Recertification audit was performed by NSF February 24-25 and April 20-21, 2015 by Norman Boatwright, Lead Auditor and Tucker Watts, Team Auditor. Both Auditors meet the qualification criteria for conducting SFIS Certification Audits contained in the Sustainable Forestry Initiative® Requirements. The objective of the audit was to assess continuing conformance of the firm's SFI Program to the requirements in Section 2 of the Sustainable Forestry Initiative® 2015-2019 Standards and Rules.

The scope of the SFIS Audit included the SFI program of The Westervelt Company and its fee timberland and long term lease properties located in Alabama, Georgia, Mississippi, South Carolina and Virginia. Forest practices that were the focus of field inspections included those that have been conducted since the previous field audit conducted in April, 2014. In addition, all of the SFI obligations to promote sustainable forestry practices, to seek legal compliance, to support and implement training for loggers and forest managers, to promote sustainable forest management, and to incorporate continual improvement systems were reexamined during the audit. Use of the SFI logo and the requirement to provide a public disclosure of audit reports were also reviewed.

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

- Core Indicator 1.1.2 - Conversion of cover types
- Performance Measures 8.2 and 13.1. - Management of Public Lands
- Core Indicator 10.1.2 Research on genetically engineered trees

### **SFIS Surveillance Audit Process**

The review was governed by a detailed audit protocol designed to enable the audit team to 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.

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**

TWC's SFI Program was found to be in full conformance with the SFIFM Standard. The NSF Audit team identified a transitional minor non-conformance and no opportunities for improvement.

CI 1.3.1 *Forest lands converted to other land uses shall not be certified to this SFI Standard.* The Company had not removed limestone quarries and office sites from the audit scope. The issue was resolved before the completion of the audit and this corrective action request is closed and will be reviewed at the next surveillance audit.

The following areas were found to exceed the standard:

CI 4.1.4 Requires that *Program Participants participate in or incorporate the results of state, provincial, or regional conservation planning and priority-setting efforts to conserve biological diversity and consider these efforts in forest management planning.* The Company's development of a gopher tortoise mitigation bank and 4 wetland mitigation banks as well as its eagle next and old growth cypress management efforts exceed this requirement.

CI 4.3.2 Requires the *appropriate mapping, cataloging and management of identified ecologically important sites.* The Company's efforts to train, identify of and mark the boundaries of ecologically important sites with paint and signs exceeds this requirement.

CI 4.4.1 Requires the *collection of information on Forests with Exceptional Conservation Value and other biodiversity-related data*. The Company's efforts to train its foresters in identifying and managing these habitats and in maintaining a staff of 6 wildlife biologists exceeds this requirement.

CI 10.1.1 Requires financial or in-kind support of research to address questions of relevance in the region of operations. The Company's efforts to support research cooperatives as well as NCASI exceeds this requirement.

The next audit is tentatively scheduled for the week of April 18, 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.

**Objective 1 Forest Management Planning** - To ensure forest management plans include long-term sustainable harvest levels and measures to avoid forest conversion.

*Summary of Evidence: The forest management process for The Westervelt Company and supporting documentation and the associated inventory data and growth models 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 Westervelt has programs 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 the portions of many field sites that were adjacent to water resources and reviewed permanent and temporary stream crossings*

**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: The Westervelt Company foresters and wildlife biologists have a long history of managing Westervelt's forest to improve wildlife habitat management and contribute to biological*

*diversity. Periodically the Wildlife Management Group updates habitat and biodiversity guidelines and provides periodic training for all associates.*

**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 and policies/procedures for visual quality were assessed during the evaluation. Further maps of recreation sites, combined with field visits, helped confirm a strong recreation program.*

**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, records and observations of special sites, training records, and written protection plans 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 and with loggers 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 BMP compliance forester with 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: Training records of selected personnel, records associated with harvest sites audited, and stakeholder interviews were the key evidence for this objective.*

**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: Mailing lists, agendas for meetings, and selected summaries of comments and thank you notes were sufficient to assess the requirements.*

**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: Reports filed with SFI Inc. and the SFI Inc. website provided the key evidence.*

**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, 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*

END OF PUBLIC REPORT