

### **Comments on “FSC or USGBC-Approved Equivalent”**

The Sustainable Forestry Initiative<sup>®</sup> Inc (SFI, Inc) strongly disagrees with the wood and paper criteria “Forest Stewardship Council (FSC) or USGBC-approved equivalent.” SFI encourages USGBC to recognize that the decisions it makes and the actions it takes today will impact the future of our forests, our livelihoods and our collective global well being. USGBC’s leaders and board members are encouraged to put language out to vote that recognizes the role of certified wood and paper products and understand that excluding SFI, the American Tree Farm System (ATFS) and the Canadian Standards Association (CSA) results in the discrimination against two-thirds of the certified forests in the U.S. and Canada. Healthy forests require healthy markets. SFI certification supports the responsible production of wood and paper products, communities, jobs and numerous conservation values that are derived from working forests.

Not only does this language undermine domestic wood products in green buildings, but the purchasing credits in Existing Building and Operations undermine responsibly sourced domestic paper products (copy paper, tissue paper) as well.

Unlike other materials or products in green building, forest certification is built on close to two decades of processes and stakeholder engagement. In recognition of the evolution of forest certification standards, this credit should reward all credible forest certification standards like SFI, ATFS, CSA, the Programme for the Endorsement of Forest Certification (PEFC) and FSC equally. USGBC should also look to the non-certified forest content in the supply chain, the 90% of the world’s forests not certified, and have specific language to address risk from these areas, and reward manufacturers that source legal and responsible wood and paper fiber.

USGBC does not have a defined process to determine “USGBC-approved equivalent.” This is problematic since this automatically qualifies all FSC standards over other forest certification standards. Without a defined process, how can USGBC ask members to vote on what is incomplete language. USGBC either needs a defined process, or needs to recognize all forest certification standards in the credit language for member vote.

Furthermore, USGBC has no baseline for why FSC is the only standard(s) recognized in draft 6. The proposed language assumes FSC is applied consistently across the world, which is not the case. There are 28 FSC-approved standards in 20 countries, and yet 79 countries report FSC-certified areas on the FSC database. This means there are more than 50 countries claiming FSC certifications where there are no fully endorsed FSC standards. As a result, North American forest certification standards are at a disadvantage to FSC.

Since 2005, SFI certified-products have been excluded from the forest certification/sourcing credit without ever once having been told the basis of that exclusion. In credible, open and transparent processes, organizations know the basis of their program standard’s exclusion, and with that information they can do three things: make changes to be included; education on a misperception; move on due to a lack of alignment between institutional objectives. SFI Inc. encourages the USGBC Board members to clarify why FSC meets their credit expectations and why SFI does not. This process of not defining what constitutes a credible forest certification program has carried on for 8 years. Define it and let’s move on