



SUSTAINABLE FORESTRY INITIATIVE

SFI-00001

Chairman
Craig Blair

Vice Chairman
Greg Siekaniec

Secretary and Treasurer
C. Tattersall (Tat) Smith

President and CEO
Kathy Abusow

ENVIRONMENTAL SECTOR:

Robert Abernethy
President
Longleaf Alliance

John M. Hagan
President
Manomet Center for Conservation Sciences

Jonathan Hauffler
President, The Wildlife Society

Mary Klein
President and CEO, NatureServe

Greg Siekaniec (Vice-Chairman)
CEO, Ducks Unlimited Canada

Gail Wallin
Co-Chair, Canadian Council on
Invasive Species;
Executive Director, Invasive Species
Council of British Columbia, Canada

SOCIAL SECTOR:

Steve Bullard
Dean, Arthur Temple College of Forestry
and Agriculture, Stephen F. Austin
State University

Skeet Burris
Family Forest Landowner
Cypress Bay Plantation

Bob Matters
Chairperson
United Steelworkers Wood Council

Bettina Ring
State Forester
Virginia Department of Forestry

Mark Rodgers
President and CEO
Habitat for Humanity Canada

C. Tattersall (Tat) Smith
(Secretary and Treasurer)
Former Dean and Professor
University of Toronto, Faculty of Forestry

ECONOMIC SECTOR:

Craig Armstrong
President and CEO
Millar Western Forest Products Ltd.

Craig Blair (Chair)
President and CEO
Resource Management Service LLC

Daniel P. Christensen
Chief Executive Officer
Hancock Natural Resource Group

Guy Gleysteen
Senior Vice President, Time Inc.

James (Jim) Hannan
CEO and President
Georgia-Pacific LLC

David Walkem
Chief of the Cooks Ferry Indian Band
Merritt, British Columbia, and President,
Stuwix Resources Joint Venture

May 18, 2015

Document Control Office
Mail Code 7407M
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

RE: Docket Identification Number EPA-HQ-OPPT-2014-0838. Agency Information Collection Activities; Proposed Collection and Comment Request; Assessment of Environmental Performance Standards and Ecolabels for Federal Procurement. 80 Federal Register 14372, March 19, 2015

Dear Sir/Madam:

The Sustainable Forestry Initiative® Inc. (SFI) is writing in regards to EPA's planned testing of draft guidelines for federal procurement of environmental standards and ecolabels, and specifically the request for volunteer standards development organizations to be assessed per the draft guidelines. SFI® Inc. would appreciate the opportunity for our standards to be assessed against the guidelines.

SFI Inc. is an independent, nonprofit organization that is solely responsible for maintaining, overseeing and improving the internationally recognized SFI program. Across the United States and Canada, over 250 million acres are certified to the SFI Forest Management Standard. In addition, the SFI program's unique fiber sourcing requirements promote responsible forest management on all suppliers' lands. SFI chain-of-custody (COC) certification tracks the percentage of fiber from certified forests, certified sourcing, and post-consumer recycled content. SFI on-product labels identify both certified sourcing and COC claims to help consumers make responsible purchasing decisions. SFI Inc. is governed by an independent three-chamber board of directors representing environmental, social and economic sectors equally.

SFI released its [2015-2019 Standards and Rules](#) at the start of January, further enhancing the vital link that exists between healthy forests, responsible purchasing, and sustainable communities. The SFI Standards are revised and updated every five years to incorporate the latest scientific information and to respond to emerging issues. As part of this process, comments were received during two 60-day public comment periods in 2013 and 2014, and input was received from 12 public workshops across the United States and Canada. About 10,000 stakeholders were invited to submit comments. Stakeholders included public and private landowners, forest sector representatives, indigenous communities, conservation groups, industry, academia and government officials.

Independent oversight of this entire process was provided at each stage of the revision process by the SFI External Review Panel, a distinguished group of independent experts representing conservation, professional, academic and public organizations, operating at arm's length from SFI. In addition to this oversight the SFI External Review Panel reviewed every public comment submitted during the public comment periods to guarantee the Standard revision process was transparent, objective and credible.

The SFI Forest Management Standard requires third-party independent certification audits by competent and accredited certification bodies. Certification bodies conducting audits to the SFI Forest Management Standard must be accredited by a member of the International Accreditation Forum; either the ANSI-ASQ National Accreditation Board (ANAB) or the Standards Council of Canada (SCC). To ensure conformance and continual improvement, organizations certified to the SFI Forest Management Standard are subject to a 3 year audit cycle with third-party annual audits to verify the conformance of their forest management practices and processes. In keeping with globally established practice certification bodies conducting audits to the SFI Forest Management Standard are guided by the ISO 17021-2011 Standard, which is a normative requirement of the SFI Forest Management Standard.

Given that the focus of the SFI standards are on forest management, responsible sourcing of forest fiber, and tracking of forest fiber, SFI standards are applicable to both the **Furniture** product category and the **Building Flooring** category that are part of the pilot testing.

We look forward to the opportunity to participate in the pilot project assessment. I can be reached by phone at 202-596-3456 and by email at Nadine.block@sfiprogram.org.

Regards,



Nadine Block
VP, Government Affairs, and COO