



# SUSTAINABLE FORESTRY INITIATIVE

SFI-00001

May 2, 2022

Alison Kinn Bennett  
Data Gathering and Analysis Division (7406M)  
Office of Pollution Prevention and Toxics  
Environmental Protection Agency  
1200 Pennsylvania Ave. NW  
Washington, DC 20460-0001

Re: Docket Identification Number EPA-HQ-OPPT-2014-0838. Agency Information Collection Activities; Proposed Reinstatement of an Existing Collection and Request for Comment; Assessment of Environmental Performance Standards and Ecolabels for Federal Procurement

Dear Ms. Kinn Bennett:

Thank you for the opportunity to comment on the federal register notice related to the "Assessment of Environmental Performance Standards and Ecolabels for Federal Procurement". Although the focus of the FR Notice is the information collection request, we understand that the EPA is also interested in comments on the overall proposed approach.

The Sustainable Forestry Initiative (SFI) advances sustainability through forest-focused collaboration. We are an independent, nonprofit organization that works collaboratively with our network – consisting of conservation groups, federal, state and county governments, Indigenous peoples, private landowners, manufacturers, universities and more – to leverage SFI-certified forests and products as powerful tools to help solve sustainability challenges such as climate action, conservation of biodiversity, provision of water, education of future generations, and sustainable economic development (we invite you to learn more at [forests.org](https://www.forests.org)).

The Administration has signaled the importance of tackling the climate crisis, including through its federal procurement policy. Robust markets for forest products help ensure we are keeping forests as forests, continuing to store carbon in our forests and forest products. We urge the agency to take an inclusive approach to the use of credible third-party verified standards in federal procurement policy. If the agency is going to evaluate standards, we encourage the assessment Framework to:

**1. Rely on voluntary consensus standards, transparent procedures, a balance of stakeholder interests, and a clear dispute process.**

SFI uses a voluntary consensus process to set standards, in alignment with the criteria outlined in OMB Circular A-119 on Voluntary Consensus Standards. We are committed to regularly reviewing and updating all our standards. The SFI 2022 Standards included input from more than 2,300 stakeholders from the conservation community, Indigenous communities, the forest products sector, brand owners, private forest landowners and public forest managers, government agencies, trade associations, landowner associations, academia, and the public.

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**2. Ensure that the agency's consideration of environmental effectiveness appropriately recognizes the value of single-attribute standards and relies on existing credible assessment processes.**

SFI standards require key elements of sustainable forest management, including requirements to conserve wildlife habitat, provide clean water, train logging professionals, respect Indigenous rights, and support conservation research. SFI-certified organizations must meet or exceed applicable water quality laws and regulations, with measures to manage and protect wetlands and riparian zones. They must continually evaluate habitat and biodiversity impacts from forest activities – which leads to improved habitat quality, and protection of imperiled or critically imperiled species.

SFI requires every certified organization to report annually to SFI on a wide variety of practices that collectively provide an extremely valuable source of aggregate data across the SFI footprint. SFI has added to this base of knowledge through direct investments in "Conservation Impact" projects that measure the link between forests certified to the SFI standards and conservation benefits that these forests provide. One example is a study conducted by NatureServe, which found that SFI-certified provide significant area for globally imperiled or vulnerable (G2 or G3) plant and animal species. Almost 75% of SFI-certified lands in the areas studied were composed of "core areas" - areas with greater potential to support specialist species. More information about these Conservation Impact research projects is available at <https://www.forests.org/conservation-impact-project/>.

The SFI standards are widely recognized by the public and private sector, including by:

- USDA, whose 2011 study on the environmental and economic benefits of using wood in green building construction found that "Sustainability of forest products can be verified using any credible third-party rating system, such as SFI, FSC, or ATFS."
- EPA, whose 2016 rule on forest roads and water quality recognized SFI for "important contributions to improved BMP implementation through logger training, landowner outreach, and water quality requirements."
- The US Green Building Council, which updated its Leadership in Energy and Environmental Design (LEED) rating system in 2016 to recognize wood and paper from SFI as part of an integrated approach to encouraging environmentally responsible forest management in the building material's supply chain.

**3. Rely on independent verification of standards.**

Third-party independent certification is a cornerstone of SFI's standards. It verifies that all the requirements set out in the relevant SFI standard and supporting documents are appropriately met. A group of competent, accredited, and 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. This process is the same for the SFI Forest Management Standard, the SFI Fiber Sourcing Standard, the SFI Chain-of-Custody Standard, and the SFI Certified Sourcing Standard.

Thank you for your consideration of our comments. We look forward to continuing to engage with the agency on its application of the assessment Framework.

Regards,



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