



June 30, 2020

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Dear Ms. Abusow and Mr. Metnick:

We are writing to comment on the May 1 draft of the Sustainable Forestry Initiative (SFI) 2022 Forest Management Standard. NRDC is an international nonprofit environmental organization with more than 3 million members and online advocates in both the United States and Canada. For more than thirty years, NRDC has worked in partnership with Indigenous Peoples and environmental organizations to support sound environmental decision-making and preserve some of the world's most precious and iconic ecosystems.

The earth's climate, forests, and biodiversity are approaching grave tipping points. Meteorologists say 2020 will be the hottest year on record, with temperatures in Siberia surpassing 38 degrees Celsius (100 degrees Fahrenheit) this month. Climate scientists have identified intact forest protection as critical in the fight against devastating climate change.<sup>1</sup> Yet forests are declining at an alarming rate, with industrial logging playing a significant role in deforestation and forest degradation. In Canada alone, logging claims more than a million acres of boreal forest each year.<sup>2</sup> The widespread disturbance of forests is contributing to plummeting species populations. An estimated one million species face extinction worldwide, and

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<sup>1</sup> James Watson et al., "The Exceptional Value of Intact Forest Ecosystems," *Nature Ecology and Evolution* 2 (February 26, 2018): 599–610.

<sup>2</sup> Jennifer Skene and Shelley Vinyard, "The Issue with Tissue: How Americans Are Flushing Forests Down the Toilet" (Natural Resources Defense Council, February 2019), <https://www.nrdc.org/resources/issue-tissue-how-americans-are-flushing-forests-down-toilet>.

approximately 30 percent of birds in the U.S. and Canada have declined since 1970, with habitat loss as a key driver of species decline.<sup>3</sup>

Faced with such ecological threats, consumers are looking for more sustainable products that alleviate pressures on the world's forests, as demonstrated by nearly 500,000 letters sent to Procter & Gambler and Costco urging the companies to reduce their harmful footprints on Canada's boreal forest. As a certifier of forest pulp and products which has been the subject of intense criticism over its weak social and environmental requirements, SFI has had years to add teeth and rigor to its certifying process. Over the years, academics, industry watchdogs, and environmental groups have publicly warned that SFI is serving as a "greenwashing" body,<sup>4</sup> and dozens of major companies have committed to distancing their supply chains from SFI.<sup>5</sup>

We are therefore dismayed that SFI has made no meaningful improvements to its existing weak requirements. If SFI finalizes its proposed new standard, we are concerned that members of the public will continue to mistakenly confuse the SFI logo with sustainably sourced forest materials. The proposed standard, moreover, threatens to further enable further deforestation and degradation in the world's remaining forest landscapes, including Canada's boreal forest. And it would undermine legitimate legal and voluntary attempts to ameliorate industrial logging's significant impacts.

The environmental nonprofit organization Canopy has submitted comments detailing many concerns about the proposed new standard, which are concerns that we share. In NRDC's comments, we focus on some particularly concerning elements of the standard, which are not meant to be an exhaustive overview of its deficiencies. We also are concerned about additional components of the 2020 Standards and Rules Package, including the Fiber Sourcing Standard. Thus the comments below are not all-encompassing, but represent a snapshot of our concerns:

**SFI does not require Free, Prior and Informed Consent (FPIC):** We are deeply concerned that the new standard does not explicitly require organizations to obtain Free, Prior and Informed Consent from Indigenous Peoples who could be impacted by organizations' proposed activities. It is not enough to require organizations to be "*in compliance with all applicable laws*" with respect to the rights of Indigenous Peoples; voluntary certification bodies should go beyond requiring companies to act within the law. SFI references the United Nations Declaration of the Rights of Indigenous Peoples as a resource for organizations, but this reference is far from enough. SFI should, at a minimum, require organizations to obtain Free, Prior and Informed Consent before engaging in operations that impact the traditional territories, resources, and rights of Indigenous Peoples. SFI should additionally require organizations to provide Indigenous communities with significant roles in the independent audit process.

**SFI Allows Conversion of Natural Forests into Plantations:** We are alarmed to see that the proposed SFI standard continues to allow the conversion of forests into non-forest use including

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<sup>3</sup> Kenneth V. Rosenberg et al., "Decline of the North American Avifauna," *Science* 366, no. 6461 (October 4, 2019): 120–24.

<sup>4</sup> Stand.earth, "Environmental Leaders Critique SFI," accessed June 30, 2020, <https://www.stand.earth/page/forest-conservation/primary-and-intact-forests/environmental-leaders-critique-sfi>.

<sup>5</sup> Stand.earth, "Stop Greenwashing," accessed June 30, 2020, <https://www.stand.earth/stop-greenwashing>.

plantations, if the organization completes an “assessment” of the anticipated impacts first. While the standard indicates that conversion is not allowed in some instances (for example, forest types “critical to threatened and endangered species”), there is no evidence that these exceptions will be determined by peer-reviewed science, or in consultation with Indigenous and academic wildlife experts. In light of widespread, non-science-based industry claims that industrial logging is not harmful to threatened and endangered species,<sup>6</sup> we are concerned that organizations will have enormous leeway to claim that they are meeting SFI’s threshold while continuing to put threatened and endangered species’ habitat at risk.

**SFI Has No Meaningful Protections for Threatened Species Habitat:** The proposed SFI standard has very ill-defined and non-obligatory language around organizations’ duty to protect the habitat of threatened species. SFI-approved operations could thus be able to continue degrading the habitat of species like the boreal caribou, a threatened indicator species whose declining populations reflect broader ecological instability in Canada’s boreal forest. In contrast, the Forest Stewardship Council Canada has created new safeguard requirements for operations that could impact boreal caribou habitat, with significantly more robust policy requirements for operators than SFI’s vague guidance.<sup>7</sup>

**SFI Continues to Permit Clearcuts:** SFI allows clearcuts larger than 120 acres in ill-defined circumstances, for example, “when necessary... to achieve ecological objectives.” These “ecological objectives” are extremely nebulous and could easily be used to justify clearcutting in large areas of intact forest, especially considering that SFI’s communication materials claim without caveat that its own certified forest harvesting operations are beneficial to the global climate,<sup>8</sup> an unnuanced position which is in conflict with peer-reviewed science.

**SFI Permits the Use of Highly Hazardous Pesticides:** SFI allows the use of highly hazardous pesticides classified as 1A and 1B by the World Health Organization “where no other viable alternative is available.” Dangerous pesticides should not be permitted under any circumstances.

**SFI Has No Meaningful Requirements around Carbon Storage and Climate Change:** A gaping hole in SFI’s proposed standard, is the omission of any meaningful obligations for organizations to reduce the carbon emissions associated with their logging operations. SFI acknowledges the threat of climate change, but treats industrial harvesting as a blanket climate solution, stating “We know that when we actively manage our forested landscapes for wood products, we can maintain forests as a carbon sink.” While global pressure increases for forest product producers and purchasers to measure, publicly report, and reduce their Scope 1, 2, and 3 emissions, SFI instead vaguely requires organizations to be “aware of the effects of their management on forest carbon dynamics as they relate to climate” and take those considerations “into account.” This is particularly concerning in light of evidence that deforested “scars” from widescale industrial logging in Canada’s boreal forest have remained for decades after

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<sup>6</sup> Julee J. Boan et al., “From Climate to Caribou: How Manufactured Uncertainty Is Affecting Wildlife Management,” *Wildlife Society Bulletin* 42, no. 2 (June 26, 2018), <https://wildlife.onlinelibrary.wiley.com/doi/full/10.1002/wsb.891>.

<sup>7</sup> Courtenay Lewis, “FSC Canada Pulls Even Further Ahead of the Pack,” *Natural Resources Defense Council* (blog), June 3, 2019, <https://www.nrdc.org/experts/courtenay-lewis/fsc-canada-pulls-even-further-ahead-pack>.

<sup>8</sup> Sustainable Forestry Initiative, *The Importance of Forests in Mitigating Climate Change*, 2019, <https://www.youtube.com/watch?v=es9LZahaDkk>.

harvesting,<sup>9</sup> indicating that forest managers are severely overestimating replanted commercial forests' ability to recover lost carbon.

**SFI Does Not Explicitly Prohibit Genetically Modified Trees in Certified Forests.** SFI's proposed standard does not explicitly prohibit the use of GMOs (genetically modified organisms) in its forests beyond 2022. This is concerning considering the large data gaps and risks around GMOs in forests.

**No Required Protections for Intact and Primary Forests.** Intact and primary forests are critical for carbon storage and protecting plant and animal biodiversity. There is growing global consensus that large areas of the natural world need to be protected in order to avoid the worst effects of climate change and mass species extinction, including national governments' commitments to protecting thirty percent of the world's natural areas by 2030. Voluntary certification bodies should therefore build on and enhance these commitments. Yet the proposed standard has no requirements for organizations to set aside and protect primary or intact forests, either from a carbon storage lens or species protection lens.

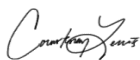
It appears that SFI has spent significant time and resources crafting language that constitute a continuation of its past policies, relying on lax and nebulous recommendations rather than obligatory and meaningful safeguards based in science. It is unclear how the proposed changes will lead to improvements on the ground, and we are concerned it will continue to confuse consumers and companies seeking sustainable forest products. We ask SFI to materially improve – rather than aesthetically tweak – its policies, and to become part of the forest solution rather than part of the problem.

We would appreciate the opportunity to engage with you further on our concerns and recommendations.

Thank you,



Anthony Swift, Director, Canada Project, Natural Resources Defense Council



Courtenay Lewis, Manager of Ecosystems Policy, Canada Project  
Natural Resources Defense Council

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<sup>9</sup> Trevor Hesselink, "Boreal Logging Scars: An Extensive and Persistent Industrial Footprint in Typical Clearcuts of Northwestern Ontario, Canada" (Wildlands League, December 4, 2019), <https://wildlandsleague.org/news/loggingscars/>.