



# Rock-Tenn Public SFI Surveillance Audit Report

The SFI Program of Rock-Tenn Company, LLC of Demopolis, AL has demonstrated continuing conformance with the Sustainable Forestry Initiative Standard®, 2005-2009 Edition and to the major changes found in the 2010-1014 Edition (SFIS), according to the NSF-ISR SFIS Certification Audit Process.

NSF-ISR initially certified Gulf States Paper Corporation to the SFIS on August 27, 2004. The Demopolis paper mill and Rooster Bridge chip mill were later sold to Rock-Tenn Company, LLC. This report describes the first annual follow-up Surveillance Audit after recertification last year. The Audit is designed to focus on changes in the standard, changes in operations, the management review system, and efforts at continuous improvement. In addition, a subset of SFI requirements were selected for detailed review.

Rock-Tenn Company, LLC operates the Demopolis paper mill and Rooster Bridge chip mill. The primary species utilized include pine and hardwood. The facility draws wood fiber from southwestern Alabama and southeastern Mississippi. SFI Program is managed by Eddie Lary.

The surveillance audit was performed by NSF-ISR on April 27-29, 2010 by Norman Boatwright, Lead Auditor. Audit team members fulfill the qualification criteria for conducting SFIS Certification Audits contained in the Sustainable Forestry Initiative® Audit Procedures and Qualifications (SFI APQ). The objective of the audit was to assess continuing conformance of the firm's SFI Program to the requirements of the Sustainable Forestry Initiative® Standard, 2005-2009 and to the major changes found in the 2010-1014 Edition.

The scope of the SFIS Audit included procurement operations obtaining fiber from west Alabama and east Mississippi. A sample of procurement operations since that time were reviewed to ensure that SFI Procurement Standards were met. In addition, a subset of SFI obligations to promote sustainable forestry practices, to seek legal compliance, and to incorporate continual improvement systems were reexamined during the audit.

Several of the SFI Performance Measures were outside of the scope of the Rock-Tenn Company, LLC SFI program and were excluded from the scope of the SFI Certification Audit as follows:

- Objectives 1-7, PM 8.5, 8.6, 12.3 and 12.4, CI 11.1.4 and 12.2.3.

## **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. Surveillance Audits generally focus on conformance issues and do not generally address exceptional practices.

### Overview of Audit Findings

The Rock-Tenn Company, LLC SFI Program was found to be in full conformance with the SFIS Standard. The NSF-ISR SFI Certification Audit Process determined that there were no non-conformances or opportunities for improvement.

Rock-Tenn has chosen the option of remaining under the 2005-2009 Standard through 2010. The requirements of the SFI 2010-2014 Standard are to be phased in during 2010. NSF has audited the program against the additional or changed requirements. The program overall is already meeting the vast majority of additional requirements. Five areas where more work remains to be done include:

- Information regarding the management of harvest residue should be included in the materials given to forest landowners: Revised SFI 2010-2014 Indicator 8.1.1 requires that “Program Participants shall supply regionally appropriate information or services (e.g. information packets, websites, newsletters, workshops, tours, etc.) to forest landowners, describing the importance and providing implementation guidance on:..... e. management of harvest residue.....”. Landowner handouts do not currently contain information about the management of harvest residue.
- Consider the occurrence of G-1 or G-2 species as reason to contact the landowner: Revised SFI 2010-2014 Indicator 8.1.2 requires “Program to address Forests with Exceptional Conservation Value in harvests of purchased stumpage”. Program outlined in the updated *RockTenn SFI Program Promoting Sustainable Forestry Practices* is generally sufficient. A gap is identified where program states “If a G-1 or G-2 species or community is present and represents a **viable population** on a purchased stumpage tract, the Procurement Foresters would contact the landowner.....”
- Consider additional requirements when designing logger training courses: Revised SFI 2010-2014 Indicator 16.2.1 requires “Participation in or support of SFI Implementation Committees to establish criteria and identify delivery mechanisms for wood producers’ training courses that address:.... f. (OSHA) and Canadian Centre for Occupational Health and Safety (COHS) regulations, wage and hour rules, and other provincial, state and local employment laws; g. transportation issues; h. business management; i. public policy and outreach; and j. awareness of emerging technologies. Current logger training courses do not adequately address all of the new requirements.
- Consider regional conservation planning and priority-setting efforts when planning. Revised SFI 2010-2014 Indicator 17.1.5 requires that “Program Participants are knowledgeable about credible regional conservation planning and priority-setting efforts that include a broad range of stakeholders and have a program to take into account the results of these efforts in planning”. Management is not considering conservation and priority-setting efforts when planning.

This program is being audited under the continuous surveillance audit option. The next surveillance audit is scheduled for July 27, 2010.

## 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 with the conservation of soil, air and water quality, biological diversity, wildlife and aquatic habitat, recreation, and aesthetics.

### **2. Responsible Practices**

To use and to promote among other forest landowners sustainable forestry practices that are both scientifically credible and economically, environmentally, and socially responsible.

### **3. Reforestation and Productive Capacity**

To provide for regeneration after harvest and maintain the productive capacity of the forestland base.

### **4. Forest Health and Productivity**

To protect forests from uncharacteristic and economically or environmentally undesirable wildfire, pests, diseases, and other damaging agents and thus maintain and improve long-term forest health and productivity.

### **5. Long-Term Forest and Soil Productivity**

To protect and maintain long-term forest and soil productivity.

### **6. Protection of Water Resources**

To protect water bodies and riparian zones.

### **7. Protection of Special Sites and Biological Diversity**

To manage forests and lands of special significance (biologically, geologically, historically or culturally important) in a manner that takes into account their unique qualities and to promote a diversity of wildlife habitats, forest types, and ecological or natural community types.

### **8. Legal Compliance**

To comply with applicable federal, provincial, state, and local forestry and related environmental laws, statutes, and regulations.

### **9. Continual Improvement**

To continually improve the practice of forest management and also to monitor, measure and report performance in achieving the commitment to sustainable forestry.

*Source: Sustainable Forestry Initiative® (SFI) Standard, 2005–2009 Edition*

### **For Additional Information Contact:**

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