



## 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 (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 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. SFI Program is managed by Eddie Lary.

The surveillance audit was performed by NSF-ISR on March 19-21/2007 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.

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, PMs 8.5, 8.6, 12.3 and 12.4

### **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**

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 was one (1) minor non-conformance that is described herein:

1. A BMP issue was not adequately addressed on a purchased stumpage tract.

Rock-Tenn Company, LLC has developed a plan to address this issue. Progress in implementing the corrective action plan will be reviewed in subsequent surveillance audits.

An opportunity for improvement was also identified. This finding does not indicate a current deficiency, but served to alert Rock-Tenn Company, LLC to areas that could be strengthened or which could merit future attention.

Rock-Tenn Company, LLC has also improved its SFI program as follows:

- Through exemplary financial support of research that addresses questions of relevance in its area of operations.

This program is being audited under the continuous surveillance audit option. The next surveillance audit is scheduled for March 17, 2008.