

## APPENDIX III



### **SFI Public Audit Report Glatfelter Chillicothe Woodlands**

The SFI Program of the Glatfelter Chillicothe Woodlands of Chillicothe, Ohio has achieved continuing conformance with the SFI Standard®, 2005-2009 Edition, according to the NSF-ISR SFIS Certification Audit Process. Glatfelter Chillicothe Woodlands was initially certified on December 4, 2006. This report describes the results of the second annual follow-up surveillance audit.

Glatfelter Chillicothe Woodlands's SFI Program is managed by Eric Roush, a forester with the company. Glatfelter Chillicothe Woodlands procures fiber for a pulp and paper mill in Chillicothe, Ohio. The mill uses both hardwoods and softwoods and accepts most trees common to the area. Most of the fiber is sourced from Ohio, Kentucky, and West Virginia through stumpage purchases or from independent wood suppliers. Small volumes are sourced from adjoining states, with occasional supplies from as far south as Georgia.

Wood procurement operations in southern Ohio and Kentucky, including yards at Maceo and Piketon, were the focus of the audit, conducted on October 29 and 30, 2008 by Mike Ferrucci, Lead Auditor for NSF-ISR. Audit team members conducting SFI audits for NSF fulfill the qualification criteria for conducting SFIS Certification Audits contained in the Sustainable Forestry Initiative® Audit Procedures and Qualifications (SFI APQ) 2005–2009 Edition.

The objectives of the SFIS Audit were to assess continuing conformance of the firm's SFI Program to the requirements of the Sustainable Forestry Initiative® Standard, 2005-2009 Edition and whether any outstanding corrective action plans were implemented. The scope of the audit included procurement operations conducted since the previous audit, with some field sites reviewed that were active since spring of 2007. In addition, SFI obligations to promote sustainable forestry practices, to seek legal compliance, and to incorporate continual improvement systems were within the scope of the audit.

The 2005-2009 Sustainable Forestry Initiative Standard® was used without modifying any requirements. Several of the SFI Indicators were outside of the scope of the company's SFI program and were excluded from the scope of the SFI Certification Audit as follows:

- Objective 1 through 7 were excluded, as Glatfelter Chillicothe Woodlands does not manage land.
- Indicators 8.5 and 8.6 were excluded, as this facility does not purchase wood or fiber from outside the US or Canada.
- Indicator 11.1.4 was excluded, as there is no research or deployment of trees derived from improved planting stock & biotechnology.
- Indicator 12.3 and 12.3.4 were excluded, as this facility does not have forest management responsibilities on public lands.

#### **SFIS Audit Process**

NSF-ISR initiated the SFIS audit process with a planning phone call to confirm the scope of the audit, to review the categories of evidence to be used to assess conformance, to verify that Glatfelter Chillicothe Woodlands was

prepared to provide evidence of continuing conformance to the SFIS Certification Audit, and to prepare an agenda and audit plan. NSF then conducted the SFIS Certification Audit of conformance to the SFI Standard. A report was prepared by the lead auditor and reviewed by an independent Certification Board Member assigned by NSF. Final approval was provided by this CB Member.

The actual NSF-ISR SFI Certification Audit was governed by a detailed Audit Plan designed to enable the audit team to determine conformance with the applicable SFI requirements. The plan included detailed provisions for the assembly and review of audit evidence consisting of documents, interviews, and on-site inspections of ongoing or completed forest practices.

During the audit NSF-ISR's audit team reviewed a sample of the written documentation assembled to provide objective evidence of SFIS Conformance. The audit team leader also selected field sites for inspection based upon the risk of environmental impact, likelihood of occurrence, special features, and other criteria outlined in the NSF-ISR SFI-Standard Operating Procedure. The lead auditor also selected and interviewed stakeholders such as contract loggers, landowners and agency staff, and interviewed employees within the organization to confirm that the SFI Standard was understood and actively implemented.

Follow-up or Surveillance Audits are required by the Sustainable Forestry Initiative Standard. The option for Continuous Surveillance Audits is being used for this certificate. The next Surveillance Audit is scheduled for November 9-13, 2009 in conjunction with the audit of the Glatfelter Pennsylvania SFI program.

### **Overview of Audit Findings**

The possible findings of the audit included Full Conformance, Major Non-conformance, Minor Non-conformance, Opportunities for Improvement, or Exceeds the Standard.

Glatfelter Chillicothe Woodlands's SFI Program was found to be in conformance with the SFIS Standard. There were no non-conformances. One opportunity for improvement was identified under SFI Indicator 13.1.2 which requires "System for collecting, reviewing, and reporting information to management regarding progress in achieving SFI Standard objectives and performance measures." There is an opportunity to improve the collection of data for the SFI Annual Progress Report.

NSF-ISR identified the following areas where Glatfelter's forestry practices and operations exceed the basic requirements of the SFI Standard:

- Indicator 8.3.3 requires a program to address adverse weather conditions. Glatfelter Chillicothe Woodlands utilizes numerous methods to meet this requirement, including considerable support for low-impact logging systems, development of programs to build wood inventories in the forest (cold decking pulpwood), and a varied and long-ranging procurement program that helps avoid wet weather logging issues.
- Indicator 8.4.1 involves having a system for monitoring the use of BMPs by wood producers and to evaluate the results of promotion and use of BMPs across the wood and fiber supply area. Glatfelter Chillicothe Woodlands has a strong program for monitoring BMPs by wood producers that is linked to outside monitoring information but also includes robust monitoring by Glatfelter foresters.
- Indicator 10.1.4 requires contractor education and training sufficient to their roles and responsibilities. Glatfelter Chillicothe Woodlands requires all contractors to be trained to the SFI-approved level, and many suppliers also have such training.

## **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*

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