

# FOREST ETHICS

September 7, 2011

Ms. Kathy Abusow  
President and CEO  
Sustainable Forestry Initiative  
900 – 17<sup>th</sup> Street NW, Suite 700  
Washington, D.C. 20006  
kathy.abusow@sfiprogram.org

Re: Greenwashing

Dear Ms. Abusow,

We are writing to express our concern that the Sustainable Forestry Initiative's ("SFI") continued efforts to confuse the burgeoning green lumber and paper marketplace are becoming increasingly misleading. By signing this letter, we are also demonstrating that SFI's program is opposed—not supported, as SFI claims—by “conservation groups across North America.”

Now more than ever, citizens and companies in the United States and beyond are seeking sustainable products and services. As you know, this green market, estimated by some to be upwards of \$500 billion worldwide, is only going to grow. This can be a good thing both for businesses and for the environment. However, our organizations are increasingly concerned that the SFI continues to claim to be an independent eco-label with high environmental and social standards when this is demonstrably false. We understand that the *status quo* timber industry values the SFI, but SFI can continue to serve that industry without confusing the public or misrepresenting what SFI is.

Despite repeated requests made by several signatories of this letter, SFI refuses to reveal in detail the sources of its funding. It has been claimed that all or nearly all of SFI's funding comes from the logging and land-holding industries. Based on your refusal to be transparent about this issue, we can only conclude that all or nearly all of your funding is in fact from the same forest products industry SFI claims to be policing. As such, your repeated claims on your website, in presentations to companies, and written documents and marketing materials to being “fully independent” are false, deceptive, or misleading. We request that you stop making these statements as they mislead both companies who are considering using the SFI label and consumers seeking green goods.

The legal form SFI has taken in recent years is also misleading. The idea that SFI serves a public or ‘charitable’ purpose, as a 501c3 non-profit, is deceptive considering that SFI depends entirely upon the largesse of a single industry. This appears to violate the spirit of the law and likely the letter as well. We encourage you to revert to the form that SFI had originally, that of a Trade Association, or IRC 501(c)(6) organization, as this more honestly represents SFI's function and purpose. Trade associations play an important role for the industries that they cater to and they do so in a way that is less confusing to the public. In short, we urge you to return to the legal form that SFI, for good reason, chose originally and maintained for many years.

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SFI should stop claiming to have a genuine process for enforcing forest product company non-compliance with SFI standards. As is apparent from the Sierra Club's 2009 non-conformance complaint against the Weyerhaeuser Company for irresponsible logging in southwest Washington, SFI's environmental standards are effectively unenforceable and SFI fails to take responsibility for landowner non-compliance with those standards. For example, SFI completely separated itself from this complaint by putting the onus of the complaint on Weyerhaeuser's paid auditor, changed the appeals process in mid-course, and attempted to refer the Sierra Club's complaint to an ANSI review process.

SFI's fiber sourcing label should be discontinued. It is misleading the public and conscientious corporate consumers who think that this label is attached to some chain-of-custody requirement. For a "fiber sourcing" label to have practically no requirements to address fiber sourcing is clearly misleading. We know that SFI acknowledges on its website (and presumably elsewhere) that the SFI fiber sourcing label actually does not require a process that would identify the sourcing of the fiber in the product bearing this label. But that acknowledgment does not correct what appears to be a clear intent to mislead consumers.

Lastly, we urge you to stop publishing advertisements that mislead ordinary citizens as well as large companies trying to improve their environmental performance. SFI advertisements in major magazines present the logging practices endorsed by SFI as beneficial for forests. We have first-hand knowledge that this is not the case – in fact many of our members, who number in the many millions across North America, routinely bring to our attention large clearcuts that have had significant negative impacts on water quality, soil erosion and habitat for sensitive species and often they have been approved by SFI. No individual or company seeking a forest product with an eco-label would think that the paper or wood came from logging in endangered species habitat or on extremely steep and unstable slopes near salmon-bearing streams and above population centers, yet these are all things that SFI has permitted.

We would be happy to discuss these issues with you further and hope you will take action on these requests. There is too much at stake for anyone to make false green claims to a public that, now more than ever, wants to find products that match their values.

Signed,

*ForestEthics • Friends of the Earth • Natural Resources Defense Council • Sierra Club • Rainforest Action Network • Center for Biological Diversity • Dogwood Alliance • Wild South • Wild West Institute • Environmental Protection Information Center • Alliance for the Wild Rockies • Conservation Northwest • Ebbetts Pass Forest Watch • Natural Resources Council of Maine • Forest Ecology Network • Gifford Pinchot Task Force • Klamath-Siskiyou Wildlands Center • Wild Earth Guardians • Green America • Oregon Wild • The Green Life*

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