November 13, 2015

Gina McCarthy, Administrator
Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Dear Administrator McCarthy,

I’m writing to express my strong concern with the recently published “EPA Recommendations for Specifications, Environmental Performance Standards, and Ecolabels for Federal Procurement,” published in the Federal Register on September 25, 2015. There are a number of legal and technical issues with the policy and the policy itself seems to be contrary to Administration policy. I urge you to consider recognizing all credible forest certification systems in this policy, including forest products that come from American Tree Farm System certified lands.

The American Forest Foundation, a non-profit conservation organization, operates the largest sustainable woodlands program in the world, the American Tree Farm System (ATFS). In 2008, in addition to providing over 82,000 family woodland owners with tools and education to practice good stewardship, ATFS also became an internationally accredited, third-party audited forest certification system. ATFS certified landowners, who own more than 24 million acres of U.S. forests, protect and conserve water, wildlife, recreation opportunities and wood supplies based on credible forest sustainability standards and are regularly inspected and audited by third parties such as PriceWaterhouseCoopers, to confirm adherence to these standards.

The Environmental Protection Agency’s (EPA) decision to recognize only one forest certification system, the Forest Stewardship Council, in its ecolabeling recommendation for lumber products used in federal procurement, without an opportunity for public comment or any apparent justification, will mean that ATFS certified family woodland owners who have gone above and beyond usual management levels to practice sustainable forestry will see fewer market opportunities.

Furthermore, EPA is inserting itself into marketplace competition that has produced a number of credible forest certification systems – without any finding or evidence that any one system has greater environmental benefits than another. This is akin to EPA choosing Pepsi over Coke without the taste test!

We applaud EPA’s recognition of USDA’s Biopreferred program for use with wood and lumber products. This program takes the right approach, it recognizes sustainable forestry, without bias towards any one forest certification system, and innovation in the forest sector. USDA has taken the right approach through their procurement program and EPA should as well.
But this isn’t just an issue of market access, this is a forest conservation issue. EPA’s decision, which appears to be aimed at promoting sustainable forestry, a laudable goal, will in fact, do the opposite. Family woodland owners own the largest portion of America’s forests – yes more than the federal government or the big landowning companies. These owners, average Americans who struggle economically to keep their forests as forests (USDA data shows these people are typically “land rich and cash constrained”), and keep them healthy, need markets to help them with this important task.

Markets help woodland owners afford to pay the taxes, afford to do the management treatments like thinning, road maintenance, and other tasks that ensure they can protect their forests and the clean water and air, wildlife habitat, recreation and aesthetic values we all rely on from these forests.

Failing to recognize the nation’s largest forest certification system for these family woodland owners, means EPA is leaving family woodland owners out of market opportunities that will help them conserve their land. Without access to markets, woodland owners are forced to make hard choices like selling their land for development or not doing the stewardship that’s needed to protect the land.

Again, we strongly urge you to reconsider this policy and recognize all credible forest certification systems and give stronger weight to USDA’s Biopreferred program. We also urge you to allow public comment regarding this important topic which has very real implications for the conservation of America’s forests.

Thank you for your consideration.

Sincerely,

Tom Martin
President and CEO

Cc: Secretary Moniz, U.S. Department of Energy
    Secretary Vilsack, U.S. Department of Agriculture