

25 March 2024

Dear Senate President Jackson:

Senator Ingwersen, Representative Pluecker, and members of the Committee on Agriculture, Conservation and Forestry, my name is Rebecca Barnard. I am a forester with over 15 years of experience with forest certification spanning forest management (FM), CoC and responsible sourcing operations. I am currently the Forestry Certification Manager for Sappi North America, Inc. (SNA). For the past 6 plus years, I've managed Sappi's FSC, SFI and PEFC chain-of-custody (CoC) and responsible sourcing certificates covering Sappi's operations in the USA and Canada. Starting in 2008 thru 2013, I managed SFI and FSC forest management certificates for the Minnesota Department of Natural Resources across 5 million acres, which was at that time the largest single-certificate in the country and top ten in the world. I've also served for 4.5 years as the National Forester for a prominent non-profit conservation organization. Throughout my career I've participated on standard revisions taskgroups for both SFI and FSC. In 2020, I Chaired the SFI Fiber Sourcing Standard Revision Taskgroup which developed the revised fiber sourcing indicators for the current SFI 2022 Standard. I've also formerly served on the SFI External Review Panel, which is an independent body of experts that provides ongoing, independent review to SFI while contributing to quality assurance and continuous improvement.

In 6 years with Sappi, I've had the privilege to travel the world to meet with customers and stakeholders. Regardless of the product sector or country, all are impressed when I speak to the excellence of forest management in Sappi's woodbaskets and the commitment to forest certification. Sappi relies on SFI and FSC domestically, along with PEFC for global sales, and believes both SFI and FSC are needed in the wood baskets from which Sappi purchases wood and pulp in order to meet customer demand for certified fiber. **SFI and FSC both contain rigorous environmental and social standards, and it is a mistake for Maine to eliminate either of them from state lands.** Unique attributes of SFI that contribute significantly to holistic sustainability and responsible forest management include:

- Use of Best Management Practices for soil conservation and protection of water quality;
- Training requirement, a hallmark of the SFI system;
- Community and landowner engagement ;
- Investment in scientific research; and
- Engagement in grassroots SFI implementation committees to ensure consistent application of the SFI standards and investigation of public complaints via inconsistent practices hotlines.

These aspects of SFI are differentiators for North American forestry and forest products. No other certification system includes those requirements for landowners or manufacturers. Sappi is a global company with worldwide exposure across customers, stakeholders and investors. **The over 7 million acres in Maine are certified to the SFI Forest Management Standard helps differentiate our graphics and packaging products from the Somerset mill.** For context:

- "SFI Chain-of-Custody" claims, which indicate the presence of certified fiber from certified forestlands, is a free option SNA offers to North American customers as an alternative to FSC or PEFC claims, which include upcharges due to limited availability of supply. **Preventing the state from maintaining SFI certification will impact how much SFI-certified fiber is delivered to our mill and thus our ability to meet customer demands. Decreased supply threatens our ability to provide SFI chain-of-custody claims as an affordable and readily-available option.** This will in turn place more strain on the already limited FSC availability, which we prioritize for global customers in complex supply-chains where SFI is not a viable option.
- Sappi's packaging business specifically promotes SFI within supply chains and to consumers. **The SFI logo is recognized by over 50% of average U.S. consumers, well above that of any other certification, including FSC.**

- “SFI Certified Sourcing” is the default product claim for all SNA-manufactured products sold into North America. As a manufacturer that mixes both certified and non-certified fiber, SFI requires that we apply the SFI Fiber Sourcing Standard to non-certified inputs to ensure that we are avoiding controversial sources and taking proactive measures, like those mentioned earlier, to ensure responsible harvesting/procurement across all lands from which we source fiber. Sappi needs to take additional measures when sourcing from non-certified lands, so the loss of SFI on state lands increases the cost and workload to Sappi and our suppliers.

Sappi has a tremendous positive economic impact to local communities and the state. **Sappi is committed to remaining present in Maine via impressive strategic capital investments into the Somerset mill in Skowhegan**, including:

- 2012: Paper Machine No. 3 rebuild
- 2015: natural gas conversion
- 2017: woodyard upgrade totaling \$26 million
- 2018-2023: Paper Machine No. 1 transformation totaling \$170 million
- 2022-2025: \$418M investment to expand our packaging business by converting Paper Machine No. 2. The machine capacity will be increased from 260,000 to 520,000 short tons per year. The capital expenditure will be phased in over three years. The project is slated to come online early in 2025. We anticipate the project will also result in a modest increase in jobs at the Somerset mill. In addition, we expect the project to generate up to 1,000 contractor jobs. Demand for packaging and specialty papers in North America is particularly robust, especially as a more environmentally sustainable alternative to plastic packaging, and our customers are actively seeking to increase volumes with Sappi, which positions us to remain profitable and competitive in the global marketplace. This investment will provide more flexibility to meet the needs of this growing packaging sector.

In closing, losing over 630,000 acres would be detrimental to Sappi’s ability to meet customers’ needs, as there is not enough FSC-certified fiber to fulfill all our demands across all our businesses. Additionally, it could send an unfortunate message regarding the management of state lands and may set the tone or example for other landowners to drop SFI and this would likely have negative impacts on Maine’s status as a leader in certification and this may well have impacts on the decision of global customers, stakeholders and corporate leaders when making decisions about where to source wood fiber and where to maintain current operations or where to make future investments in new manufacturing, jobs, research and development, and forest management. Maine’s story is a positive one and one that offers choice and credibility across numerous customer and product sectors. Sappi encourages the Maine Legislature to allow landowners and manufacturers to continue to make choices that suit their needs and those of their customers so as to maintain Maine’s positive leadership role in certification, markets and sustainability.

SNA, a subsidiary of Sappi Limited, is helping build a thriving, sustainable world by unlocking the power of renewable resources to benefit people, communities, and the planet. Headquartered in Boston, Massachusetts, our Cloquet, Matane, Somerset, and Westbrook mills along with our Technology Center, Shared Service Center and Sheeting facility locations employ approximately 2,100 people in the United States and Canada. The success of our business is driven by collaborative customer relationships, world-class talent and assets, and outstanding products and services—strengthened by solid technical, operational, and market expertise. Our raw material offerings (such as dissolving pulp) and end-use products (packaging and speciality, graphic, casting and release papers) make everyday products more sustainable and are manufactured from woodfibre sourced from sustainably managed forests. Our products play an integral part in society, offering efficiently manufactured renewable products - all bolstered by our legacy of innovation and dedication to partnership. Together with our partners, we work to build a thriving world by acting boldly to support the planet, people and prosperity. With over 167 years as an innovator in the industry, Sappi continues to set the standard for renewable resource companies across the globe. We invite you to learn more at www.sappi.com.



Beyond my role with Sappi, I was elected by Society of American Forestry (SAF) members to serve as Vice President in 2023, President in 2024 and Immediate Past President in 2025. SAF maintains official position statements covering the full gamut of forest management topics. Relevant to this amendment, SAF's position statements on "Forest Products Industries and Markets," the "Sustainability of American Forests," and "Professionals in Natural Resource Management" speak to the importance of voluntary certification programs, professional development and training, continuous improvement and the need for markets to properly manage and keep forests as forests.

SAF supports voluntary third-party forest certification systems, such as SFI and FSC, which many public land managers in the Northeast and Lake States have been certified to since the early-mid 2000s. **This competitively differentiates America's forests and forest products while recognizing and improving sustainable forest management.** Certification systems have contributed significantly to responsible forest management and holistic sustainability by requiring the implementation of Best Management Practices (BMPs) for soil conservation and the protection of water quality, training and use of qualified loggers and foresters, landowner outreach, reforestation post-harvest, investments in scientific research, and the avoidance of controversial sources.

Certified wood fiber procured by certified mills allows for greater access to international markets for U.S. paper, packaging and pulp products via chain-of-custody processes and product claims. For many manufacturers, forestry certification is seen as a cost of doing business and a requirement for market entry/access in certain global sectors. Battles over which forest certification system is "better or best" have gone on for over two decades. SAF believes whether or not to pursue forest certification and under which system(s) is a "business decision and strategy" best determined by the land manager after careful assessment and analysis of the benefits to the forest, direct consumers and end-users, as these market forces are unique and fluctuate over time and vary between regions. As with many aspects of natural resource management, there is no one-size-fits-all and thus, different certification systems are necessary in order to meet diverse landowner objectives and consumer needs while securing stakeholder and investor confidence.

As the leading and oldest organization representing the profession of forestry in the United States, SAF believes guidance from trained, experienced, and ethical professionals should inform forest management decisions on both public and private forestlands. To this end, logger and forester training programs are critical to ensuring better outcomes on the landscape, safe working environments, and continuous improvement to meet the needs of a changing society and evolving forest. SAF recognizes the vital role that loggers play in maintaining healthy forests, vibrant economies, and societal benefits and applauds the commitment of loggers to sustainability and responsible forest management.

SAF was founded in 1900 and is the largest professional society for foresters in the world with over 9,000 members. Its mission is to advance sustainable management through science, education and technology, and to promote professional excellence while ensuring the continued health, integrity and use of forests to benefit society in perpetuity. SAF's vision is to be the trusted voice and leader empowering the forestry profession in advancing sustainable forest management to ensure thriving forests and strong communities. SAF's strategic goals including advocacy and outreach, building communities, professional growth and performance excellence. I invite you to learn more at <https://www.eforester.org/>.

If you have any questions please do not hesitate to contact me at Rebecca.Barnard@sappi.com. Thank you!

Sincerely,

R. Barnard

Ms. Rebecca Barnard,
Forestry Certification Manager, Sappi North America
2024 President, Society of American Foresters

