ACE self-commitment on third-party verified traceability systems for wood fibres

6th Annual report
(2012 figures)

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About Proforest

Proforest is an independent company working with natural resource management and specialising in practical approaches to sustainability.

Our work ranges from international policy development to the practical implementation of requirements on the ground, with a particular focus on turning policy into practice. Our extensive and up-to-date knowledge of the international context ensures that our work for individual companies and organisations is set within an appropriate framework. At the same time, we are able to bring a wealth of current practical experience to policy development processes and debates.

The Proforest team is international and multilingual and has a broad variety of backgrounds, ranging from industry to academia and NGOs. This allows us to work comfortably in many types of organisations, as well as in a range of cultures. We have in-house knowledge of more than 15 languages, including Mandarin, Malay, French, Spanish and Portuguese.

Proforest was set up in 2000. Our expertise covers all aspects of the natural resources sector, from forestry and agricultural commodities to conservation, supply chain management and responsible investment.

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1 Background

The converting members of the Alliance for Beverage Cartons and the Environment (ACE), namely Elopak, Tetra Pak and SIG Combibloc, are committed to sourcing wood fibre that is traceable to legal and acceptable sources, using processes that have been independently verified.

To achieve this goal the companies have committed to progressively increasing the amount of fibre that is traceable to well managed forests. ACE contracted Proforest to coordinate the reporting process and to produce a public report on the amalgamated figures.

This report presents the results of the sixth year of monitoring (2012) and shows the figures of fibre that is of certified and controlled origin and the progress made towards the targets specified in the self-commitment.

Progress will be reported to the EU on two targets annually:

- The percentage of fibre supply that is covered by an independent 3rd party certificate demonstrating legality and traceability.
- The proportion of manufacturing plants which have independent 3rd party Chain of Custody (CoC) certification. This does not include ‘contracted’ converting plants; i.e. where the ‘licensee’ is not utilising the company brand.

2 Methodology

ACE converting members provided information to Proforest using the reporting form shown in Annex 1. Proforest gathered supporting documentation from the ACE converting members and their suppliers to verify the figures and to cross check the certified/verified status of fibre supplies. Proforest then amalgamated the figures for all members to produce the overall figures for the Alliance. The data from the individual companies was kept confidential.

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1 Tetra Pak, Elopak and SIG-Combibloc (2007) Industry self-commitment concerning third party verified traceability systems for wood fibres in liquid packaging board used for the manufacture of beverage cartons
2.1 Acceptable fibre categories

There are four ways to demonstrate that wood fibre meets ACEs definition of Legal and Acceptable sources:

1. **It is FSC certified**
   
   Certified fibre is fibre that was supplied by a liquid packaging board (LPB) production facility in possession of an appropriate FSC Chain of Custody certificate covering the specific year, and is sold as certified with this indicated on the invoice or in the purchasing contract.

2. **It is FSC ‘controlled wood’**
   
   Controlled wood means fibre that is not certified but is deemed suitable to form part of an FSC certified product. Controlled wood is defined in the FSC CoC Standard FSC-STD-40-005. The FSC Controlled Wood Standard FSC CoC Standard FSC-STD-30-010 currently includes the same requirements as the definition being used by the ACE commitment. Controlled wood is sold under an FSC Controlled Wood Certificate with this indicated on the invoice or in the purchasing contract.

3. **It is PEFC-certified from those PEFC-endorsed standards which deliver the ACE requirements**
   
   The Program for the Endorsement of Forest Certification schemes is an umbrella system for national forest certification schemes. Standards are developed in each country and then endorsed by PEFC. Thus the PEFC certification standard is different in every country. In some cases, a national PEFC standard does not deliver the requirements of the industry self-commitment (SFI and AFS are examples). In such cases, PEFC certified wood is not recorded as being acceptable. Where there is doubt about the acceptability of a PEFC-endorsed standard, an independent comparison with the ACE commitment is required.

   PEFC fibre is supplied by a liquid packaging board production facility in possession of an appropriate PEFC Chain of Custody certificate covering the specific year, and is sold as certified.

4. **3rd party verification where none of the above is available**
   
   Where the LPB purchased contains a percentage of fibre from non-wood sources, such as straw or bagasse, none of the above standards are applicable. Thus a 3rd party expert is required to verify that the wood-based fibre is from a legal and acceptable source.

Wood fibre which does not fall within any of the above four categories, does not meet the ACEs definition of Legal and Acceptable sources and is categorised as ‘Not meeting ACE definition’.
2.2 Acceptable evidence for reporting

There are two main ways that ACE converting members could provide evidence that material was certified:

- Material was purchased from a certified production facility and invoices or other sales documents clearly confirmed that the material was certified.
- There was an overarching contract between the producer and the ACE converting member which confirmed that all material supplied is certified.

3 Results

3.1 Converting plants

The three ACE converting member companies declared a total of 53 converting plants for 2012, which was one less than in 2011.

Of the 53 plants, there are now 43 converting plants that are FSC Chain-of-Custody (CoC) certificate holders, accounting for 81% of the total. This was an increase from 2011, when the proportion was 74%. The number of FSC CoC-certified plants has increased by 3 since 2011, which means that more LPB products can potentially be labelled with FSC logos.

<table>
<thead>
<tr>
<th>Category</th>
<th>FSC CoC certified</th>
<th>Non certified</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number</td>
<td>43</td>
<td>10</td>
<td>53</td>
</tr>
<tr>
<td>Percentage</td>
<td>81</td>
<td>19</td>
<td>100</td>
</tr>
</tbody>
</table>

Overall, the converting members have made significant progress towards the ACE commitment of securing CoC certification for all beverage carton manufacturing plants by 2018. The percentage of mills with a CoC certification has increased from 6% in the first year of reporting in 2007 to 81% in 2012.
3.2 LPB Sourcing

The three ACE converting members declared a total of 2,690,141 tonnes of LPB purchased during 2012, a slightly increased quantity compared to the previous year. Of this total, 2,367,286 tonnes or 88% was classified as meeting the ACE definition of legal and acceptable sources.

The volume of fibre that meets the ACE definition in 2012 had increased from 2011 when 85% of the LPB was reported as meeting the ACE definition of legal and acceptable sources. Overall, the ACE converting members have made significant progress towards the goal of 100% wood fibre from legal and acceptable sources by 2015. During the six years of ACE reporting, the percentage of fibre from legal and acceptable sources has increased from 47% in 2007 to 88% in 2012.

<table>
<thead>
<tr>
<th>Category</th>
<th>Legal and acceptable sources</th>
<th>Not meeting ACE definition</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tonnes</td>
<td>2,367,286</td>
<td>322,855</td>
<td>2,690,141</td>
</tr>
<tr>
<td>Percentage</td>
<td>88</td>
<td>12</td>
<td>100</td>
</tr>
</tbody>
</table>
4 Observations on data and process

There was an increase in the number of converting plants that have achieved CoC certification, from 74% in 2011 to 81% in 2012. There are only 10 more converting plants to be certified in order to meet the ACE commitment of securing CoC certification for all beverage carton manufacturing plants by 2018. Some of these plants are already in the certification process, so it is expected that the percentage of CoC certified plants will further increase in the year 2013.

In terms of LPB sourcing, 88% of the material meets the ACE definition of legal and acceptable sources, compared to 85% in 2011. ACE members are thus also making good progress towards their commitment of sourcing 100% wood fibre from legal and acceptable sources by 2015.

All of the ACE members made significant progress in the 2012 reporting period. However, the time required for achievement of the ACE commitments may vary among the different members, due to differences in the sizes of operations and quantities processed. It is worth noting that one of the ACE converting members has already fully met the ACE commitments for both CoC certification of converting plants and sourcing LPB from legal and acceptable sources.

It is recommended that the ACE converting members that do not fully meet the ACE requirements should maintain and increase communication with their LPB suppliers in order to help them to move towards certification. It is also suggested that the ACE members continue increasing the number of FSC certified converting plants.

The reports and supportive documentation provided by the ACE members were of high quality and in most cases met the reporting requirements. The only issue identified was that some of the invoices included both FSC and FSC Controlled Wood claims, without clarification of which claim referred to the listed products. However, ACE members have explained the solution they have adopted and they have received full evidence to support the claims. The issue had been addressed with their liquid packaging board mill suppliers.
For the reporting year 2012, the reporting methodology was adjusted so that the converting members delivered the supporting documentation with their reports. The revised methodology was found to be more efficient and should be followed in the next reporting year.

Overall, it is likely that if the ACE converting members continue the good process made within the last six years of reporting, they will be able to meet the ACE commitments within the specified timeframe.
Annex 1: Proforest reporting template

Part 1: Contact details

In the table below, please provide the details of the relevant contact person within the ACE member company:

<table>
<thead>
<tr>
<th>ACE Member Company</th>
<th>Form completed by</th>
<th>Date</th>
</tr>
</thead>
</table>

Part 2: Overview of production

In the table below, please provide the consolidated overall figures for the company:

<table>
<thead>
<tr>
<th>Total number of Converting Plants used</th>
<th>Annual usage of LPB (tonnes)</th>
<th>Total number of LPB producing mills used</th>
</tr>
</thead>
</table>

Part 3: Converting plants

3.1 Number of converting plants FSC/PEFC certified

In the table below, list the names of the company’s converting plants and for those that have Chain of Custody certification, the relevant certificate number:

<table>
<thead>
<tr>
<th>Converting plant name</th>
<th>FSC/PEFC Certificate number (if any)</th>
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</table>
3.2 Control of certified volumes

Unless a converting plant is already independently certified, there is currently no external mechanism for verifying the volumes of certified LPB. In the table below, describe the internal mechanisms for controlling volumes in each reporting category (see section 4), such as through company data control processes or quality management systems.

<table>
<thead>
<tr>
<th>Company mechanisms for control of certified volumes</th>
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</table>
## Part 4: Number of mills FSC/PEFC certified

In this table, members need to complete the names of each mill supplying LPB to the company together with the certificate number of their FSC/PEFC chain of custody certificate if available. Against each mill, list the quantity (in metric tonnes) that was purchased in 2012 that can be counted as FSC certified, PEFC certified, FSC controlled wood, or Other.

<table>
<thead>
<tr>
<th>Name of LPB producing mill</th>
<th>FSC/PEFC Certificate number</th>
<th>PEFC certified (Tonnes)</th>
<th>PEFC national scheme used</th>
<th>FSC certified (Tonnes)</th>
<th>FSC controlled (Tonnes)</th>
<th>Other (Tonnes)</th>
<th>Comment</th>
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