A New Chapter for the Publishing Industry

Putting Promises into Practice

RAINFOREST ACTION NETWORK

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Introduction

In 2010, Rainforest Action Network alerted the publishing industry to systemic problems in its supply chain, including rainforest destruction, human rights abuses, and climate pollution.[1] Though many publishers had already made significant strides towards responsible paper sourcing, RAN, with the launch of its publishing campaign, urged leading book publishers to address remaining problems and help prevent the loss of Indonesian and other endangered forests by eliminating controversial fiber and maximizing responsible fiber in the paper they use.

In the years since, many publishers have taken this to heart, not just making strong commitments to protect Indonesian rainforests but also adopting tools, creating systems and taking actions that ensure their policies are fully implemented. Many publishers have gone beyond their initial commitments, innovating a set of best practices in the process.

This report examines the progress the book industry has made since our last report. Specifically, it identifies areas of leadership and best practices that have emerged in the last four years and tracks the impact of such practices on the future of Indonesian and other endangered forests.

The report analyzes the progress of leading publishers using three key sources: responses to a survey conducted by Rainforest Action Network in the fall of 2013, each company's paper policy and publicly available statements, and the results of independent fiber testing of 30 books printed in 2013.

The data suggests a progressive trend in a sector that, while still in transition, is demonstrating a strong commitment to social and environmental responsibility. In addition, the industry is positively impacting its supply chain partners, paper manufacturers, and forest management on the ground with respect to rainforest conservation and human rights. Leading book publishers are setting benchmarks and innovating practices that provide examples and lessons for other publishers and sectors that use paper.

While there have been big changes in the way book publishers do business, there is still room for improvement. Publishers must continue to take important steps to reduce their environmental footprint and protect Indonesia's and other endangered forests and respect human rights. This report provides recommendations for individual companies and actions that those in the publishing and others paper consuming sectors can and should take. These include: updating and improving policies, transparency and reporting; creating time-bound, deliverable-based targets; utilizing fiber testing to verify implementation; and engaging printers, mills and others to move environmental and social responsibility up the supply chain.

Although implementation is still ongoing, the changes in the book publishing sector and the innovations in best practices demonstrate what is possible, not only for other publishers that have yet to adopt and implement responsible paper policies, but also for printers and other paper buyers, as well.

Turning the Page on Rainforest Destruction

Indonesia's rainforests are a global treasure and a hotspot for cultural diversity, biodiversity, and carbon-rich peatlands. They are home to tens of millions of forest dependent peoples and endangered species, including the Sumatran tiger and orangutan. But Indonesia is also the only nation in the world where millions of hectares of diverse tropical forests have been cleared to make paper and then converted to monoculture pulp plantations.

To date, at least 10 million of Indonesia's 22.5 million hectares of peatland have already been deforested and drained, creating massive carbon dioxide emissions – much of it for pulp plantations.[2] Additionally, the land being used for pulp and paper production is claimed by Indigenous and local communities. Today, Indonesia's forests, peatlands, people and species remain under urgent threat due in part to growing international demand for cheap pulp and paper. Two companies, Asia Pacific Resources International (APRIL) and Asia Pulp and Paper (APP), produce approximately 80 percent of Indonesia's pulp and paper. Together they have cleared roughly 2 million hectares of natural forests in Riau alone since 1985.[3]

In 2010, Rainforest Action Network found that nine of ten top children's book publishers were using paper linked to the clearing and conversion of Indonesia's rainforests in books sold to American consumers. These findings, followed by education, engagement and public campaigning, resulted in eight publishers committing to eliminate controversial Indonesian fiber. Nine out of ten publishers also pledged to eliminate pulp and paper from controversial Indonesian suppliers APP and APRIL and their affiliates. These commitments and actions, along with those of many other consumer brand companies around the world, sent a strong signal to APP and APRIL.

In early 2013, APP adopted a Forest Conservation Policy, pledging that it would immediately cease the clearance of High Conservation Value (HCV) and High Carbon Stock (HCS) forests across its operations and only develop areas identified as non-forested following full HCV and HCS assessments. APP's policy also commits the company and its suppliers to resolving land conflicts and, where new plantations are developed, to respect the rights of Indigenous Peoples and local communities, including the right to give or withhold their Free Prior and Informed Consent (FPIC) to development on their lands. Despite these as well as more recent encouraging commitments, RAN maintains that APP and its products must be considered controversial until there is independent verification of tangible outcomes and satisfactory performance on the ground. In January 2014, APRIL revised and renewed its commitments – which it has previously failed to meet - to reform its practices. The content of these commitments is far weaker than APP's and projects the company continuing to use fiber from clearing natural rainforests until 2020 (*see page 9*).

In 2010 Rainforest Action Network found that nine of ten top children's book publishers were using paper linked to the clearing and conversion of Indonesia's rainforests in books sold to American consumers.

In the coming years, publishers and other consumer brand companies have a critical role to play for the future of Indonesia's forests. Companies must remain firm in their commitments to avoid controversial Indonesian sources until commitments by Indonesian pulp and paper companies are improved, implemented and verified to have an impact on the ground. Publishers and other consumer brand companies must continue to improve their policies as new information comes to light and develop and use robust systems for implementing and verifying that their supply chains are transparent and not linked to deforestation, climate pollution or human rights violations in Indonesia or other parts of the world.

Notably, leading publishers have contributed to changes in Indonesia and improved how they know and address pulp and paper supply chain issues related to Indonesia and beyond. This report profiles a set of best practices that have been developed by leading publishers over the past four years and can serve as a model for other publishers as well as all companies committed to responsible procurement, human rights and the conservation of the world's forests and species.

Publishers in 2010

In 2010, many book publishers had adopted responsible paper procurement policies and taken action to address their environmental and carbon footprint. However, independent fiber testing results commissioned by Rainforest Action Network found that the top ten children's publishers' paper policies and due diligence measures were failing to screen out controversial sources and suppliers in books printed in China. Fiber linked to rainforest destruction and human rights violations was making its way into the pages of top selling children's books via publishers' overseas printers.

Independent fiber tests revealed that out of 30 books tested, 63% contained paper with controversial wood fiber linked to Indonesian rainforest loss and 13% contained mixed tropical hardwood. Nine of 10 leading publishers were selling books printed on paper from controversial sources. In 2010 five out of 10 leading publishers did not have paper purchasing policies, but even leading policies were not sufficient to prevent controversial sources from entering publishers' overseas supply chains.

CAMPAIGN TIMELINE

March 2010:
RAN commissions fiber testing of top ten children's publishers' books and finds 60 percent of paper tested was linked to Indonesian rainforest destruction.

May 2010:
RAN releases its initial report, *Turning the Page on Rainforest Destruction: Children's books and the future of Indonesia's rainforests*, at Book Expo America, alerting publishers of links to deforestation in Indonesia and urging them to adopt commitments to eliminate controversial Indonesian fiber and suppliers and improve procurement policies and practices.

November 2010:
RAN ranks top ten children's book publishers on their paper policies and commitments to eliminate controversial Indonesian fiber in a consumer guide and report, *Rainforest-Safe Kids' Books: How Do Publishers Stack Up?* Eight of ten commit to stop sourcing paper linked to Indonesian rainforest loss and to strengthen their paper policies.

May 2011:
RAN launches a campaign urging Disney, the largest children's book and magazine publisher in the world, to adopt a comprehensive paper policy and cut its ties to Indonesian rainforest destruction.

June 2011:
RAN and Disney begin negotiations on a global paper policy.

July 2011:
Disney releases statement asking its licensees, vendors and suppliers to avoid use of papers associated with rainforest destruction.

October 2012:
Disney announces a comprehensive paper policy, which applies to its entire global operations, including 25,000 factories in more than 100 countries that produce Disney products.

CAMPAIGN TIMELINE

December 2012:
RAN alerts holiday shoppers that HarperCollins' books use paper linked to Indonesian forest destruction

January 2013:
HarperCollins announces an improved policy, which includes aggressive targets for FSC fiber in its books printed overseas.

February 2013:
APP announces a Forest Conservation Policy and an immediate cessation of the clearance of High Conservation Value (HCV) and High Carbon Stock (HCS) forests across its operations.

September 2013:
The Environmental Paper Network (EPN), in partnership with international and local conservation organizations introduces Performance Milestones for Asia Pulp and Paper's (APP) Sustainability Roadmap – Vision 2020 and new Forest Conservation Policy to guide responsible consumer companies on what APP must demonstrate in implementation of its policy over the coming year for responsible companies to consider resuming business.

January 2014:
APRIL announces a new forest commitment that falls far short of what would be considered a responsible forest approach.

May 2014:
Houghton Mifflin Harcourt & Macmillan announce new responsible paper sourcing policies. Houghton Mifflin Harcourt's policy includes a robust definition of controversial sources, including land conflicts, as well as clear processes for eliminating them. Macmillan's policy sets a new bar for reducing greenhouse gas emissions and a commitment to addressing climate change.

THE FIRST TEST

Performance milestones for customers and other stakeholders to assess the implementation of commitments made under Asia Pulp and Paper's Sustainability Roadmap - Vision 2020 and Forest Conservation Policy

Environmental Paper Network

EEPN
European Environmental Paper Network

September 2013

APRIL :
Controversial member of a Rogue Cartel

Asia Pacific Resources International Limited (APRIL) and suppliers cleared and converted 595,000 hectares of natural forest inside their Riau concessions between 1985 and 2012.[4] These areas include high conservation value forests and other natural rainforest and peatlands in need of protection.[5]

In January 2014 APRIL, which is Indonesia's second-largest pulp and paper company, released a new forest conservation commitment but this commitment projects the company using fiber from continued pulping of natural rainforests for the next six years until the start of 2020.

APRIL's January commitment is unclear and presents no comprehensive plan on how it will address the rights of Indigenous and local communities, many of which have claims on lands the company or its suppliers are currently using.

Compounding these issues is the serious lack of transparency and uncertainty about scope of APRIL's January commitment[6] and which concession areas and suppliers it applies to.

There is already evidence that the January commitment is being broken. In April 2014, an Eyes on the Forest (EOF) investigation found that between September 2013 – March 2014, APRIL drained and cleared High Conservation Value Forest on peatlands, "Through its supplier, PT Triomas Forestry Development Indonesia, in Kampar Peninsula… This confirms that APRIL is still running its operation just like business as usual despite its sustainable forest management policy commitment."[7]

In addition, the commitment does not cover the murky web of other companies – including, for example, Toba Pulp Lestari, Asian Agri and other destructive and potentially criminal businesses – linked to the Royal Golden Eagle (RGE) group or controlled by Sukanto Tanoto.

One of Indonesia's richest men, Mr. Tanoto controls a vast cartel of companies both inside and outside the RGE group. The ownership and relationships between this web of companies are largely opaque.

However, the egregious impacts of these companies are myriad. From Asian Agri, convicted by the Indonesian government of tax fraud in 2013, to Toba Pulp Lestari, accused of land grabs and violent social conflicts with Indigenous communities, Tanoto's cartel of companies is tainted.

Given the absence of transparency and information about financial flows, the group must be seen in its entirety. As with most of the profits, which benefit Mr. Tanoto and family from the various elements of the cartel, the negative impacts, misdeeds and controversy associated with each part of the cartel must be the responsibility of other cartel members.

This situation demands that social and environmental commitments extend across all of Sukanto Tanoto's holdings. It is also imperative that, until the cartel provides transparency and addresses its negative environmental, social, and governance issues, publishers and other companies committed to social and environmental responsibility, transparency and the rule of law must avoid APRIL and other Tanoto controlled companies.

Driving Change Back to The Source

PRINTERS & MILLS
Eliminate Controversial Sources and
Maximize Responsible Fiber

Chinese mills and printers have a critical role to play in breaking the link between books sold by U.S. publishers and Indonesian deforestation and human rights violations. China is importing large quantities of mixed tropical hardwood and acacia pulp from Indonesia, and paper containing these controversial sources is often used by printers printing books sold by U.S. publishers.

Like publishers, mills and printers need to develop responsible pulp and paper sourcing policies. Mills and printers must define what constitutes controversial or unwanted sources—both fiber and suppliers—and what constitutes preferred sources, as well as set out how and when unwanted sources will be eliminated and preferred sources increased. Policies should also set out clear preference and targets for recycled and FSC-certified products.

INDONESIA'S RAINFORESTS

In Indonesia's rainforests are a global treasure and a hotspot for cultural diversity, biodiversity, and carbon-rich peatlands. They are home to tens of millions of forest dependent peoples and endangered species, including the Sumatran tiger and orangutan. But Indonesia is also the only nation in the world where millions of hectares of diverse tropical forests have been cleared to make paper and then converted to monoculture pulp plantations.

PUBLISHERS
Best Practices for Changing Markets

Publishers must more deeply engage and advocate for change with their supply chain partners in order to leverage environmental, social, governance and transparency improvements. Working with printers, mills, and others to put paper policies in place that mirror their own and to monitor and require their implementation will help provide publishers more confidence in their fiber portfolio, and will help them ensure that their books are responsible.

Publishers in 2014

Between October 2013 and February 2014, RAN commissioned independent fiber tests on 30 books, three from each of 10 publishers. All of the books were printed in 2013. In addition to testing the paper from the main body of the books, RAN also commissioned the testing of the end pages.

In total, 10 out of 30 (33.3%) samples tested positive for significant percentages of Acacia fiber. Mixed tropical hardwoods fiber was found in only one of 30 samples. Compared with 2010, six publishers had a book containing mixed tropical hardwood. See the table below.

Since 2010, there have been strong shifts in the ways that publishers are integrating their commitments to eliminate controversial fiber and suppliers from their supply chain into their daily paper procurement. In 2010, five companies had public paper policies. In 2014, that number is nine. When RAN began engaging with the publishing industry in 2010, no book publishers had programs for independent fiber testing of their products. Today, eight companies are conducting independent fiber testing of their books, to verify that no unwanted fiber is making its way into the supply chain.

This dramatic decrease in the number of books containing controversial fiber is a credit to publishers' diligence with mplementation and verification, and their willingness to communicate with their printers and suppliers.

PUBLISHER	POSITIVE FOR ACACIA			POSITIVE FOR MIXED TROPICAL HARDWOODS			PAPER POLICY?	FIBER TESTING POLICY?
	Sample 1	Sample 2	Sample 3	Sample 1	Sample 2	Sample 3		
A	14%	38%	13%				•	•
B	40%			TRACE			•	•
C	44%			TRACE			•	
D	15%						•	•
E	16%	TRACE	TRACE				•	•
F	31%						•	•
G							•	•
H							•	•
I			20%			8%	•	•
J	26%	TRACE		TRACE			•	

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An Industry Innovating

Supply Chain Solutions and Developing Best Practices

Since top publishers are now aware of the Indonesian forest crisis, they have an important role to play in the supply chain, by using their influence and purchasing power to create meaningful change on the ground in Indonesia and elsewhere.

In the course of implementing commitments to eliminate controversial Indonesian fiber and broader environmental policies, leaders in the industry are developing best practices in the arena of social and environmental responsibility. As leading publishers develop and implement these practices, they are setting a new bar for the sector as a whole. These practices are creating standards and benchmarks for publishing—and also for paper procurement in other sectors. We've categorized these best practices or performance targets into the following subject areas:

▸ **Policy and targets**

▸ **Transparency and reporting**

▸ **Implementation of Indonesian Commitments— Eliminating controversial sources and Maximizing responsible fiber**

▸ **Verification -- e.g. independent fiber testing**

▸ **Outreach and work with printers, mills and others**

Policy and Targets

Any company that seeks to be responsible for its environmental and social impact needs a public policy to establish its values and to guide the development and execution of its strategy for applying those values in practice. For publishers, any environmental policy must include a focus on paper sourcing, as a large part of the industry's environmental footprint results from its paper choices.

The process of drafting the policy should result in a consensus across the company about values and the process and strategy going forward. Once written, the policy helps institutionalize and guide company actions in a grounded and consistent way. It articulates company goals and holds the company accountable to those goals. It is important to periodically revisit policies as new information and technologies emerge.

One key aspect of the policy is defining what constitutes controversial or unwanted sources—both fiber and suppliers—and what constitutes preferred sources, as well as setting out how and when unwanted sources will be eliminated and preferred sources will be increased. Some new emerging elements of unwanted sources include: adverse climate impacts relating to deforestation, forest degradation and conversion of peatlands; respecting human rights and addressing land and social conflicts as well as level of supply chain and financial transparency; and quality of fiscal governance. Policies should also set out clear preference and targets for recycled and FSC-certified products.

It is important that any environmental policy contain quantitative, time-bound, multi-year performance targets, not just pledges to "increase" or "maximize" environmentally preferable choices. Ideally, those targets should include clear metrics and require efforts needed to achieve the target by projected due date, and should escalate over time to create incentives to continue to improve. The current best-in-class policies also include clarity on verification—e.g. fiber declarations and testing, certification, independent audits, etc. —involvement of stakeholders and reporting.

LEADER

Disney

Disney's paper policy sets robust principles for responsible paper sourcing across its global operations, including maximizing where possible, environmentally superior sources and eliminating controversial sources. The policy's inclusion of requirements for suppliers to respect human rights and avoid the degradation of high-carbon landscapes such as tropical peatlands distinguishes it as a leading policy that should inform others. The company's inclusion of licensees and extensive scope also distinguish the policy. It also outlines a clear, time-bound plan for implementation, and a strong commitment to stakeholder engagement and annual reporting. Although Disney's policy remains in the early stages of implementation, the company's early focus on tracking and verification systems and processes lays a strong foundation for robust implementation.

Transparency and Reporting

Once written, it is best practice for the policy itself to be released and made available to the general public. This ensures that all stakeholders can assess and provide feedback on the company's commitments. This allows consumers to see which companies share their values and make appropriate choices about which brands to support with their purchases.

On at least an annual basis, the company should release a public report detailing its progress toward achieving its environmental goals and meeting its quantitative performance targets. Where appropriate or when targets are not met, the company should explain why targets have not been met, what lessons have been learned and revise its targets and timelines.

LEADER

Hachette

Hachette has a very strong track record of setting targets and reporting on its environmental progress. The company has published detailed progress reports in 2011 and 2012, which include updates in a number of key areas, including: Reducing Climate Impacts, Increasing Certified and Recycled Fiber, Protecting Endangered Forests, and Monitoring and Reporting.

LEADERS

Scholastic and HarperCollins

Scholastic has explicitly eliminated controversial fiber from Indonesia, including from APRIL and its suppliers (*see page 9*). Scholastic has set ambitious targets for FSC-certified fiber—first 30%, then 35%; it exceeded that target at 68%. In the past, when mixed tropical hardwood fiber has been discovered in the supply chain, the company has been swift in its action to eliminate that supplier.

HarperCollins incorporates third-party certification and evaluation expertise in addition to its own verification processes to help eliminate controversial and unwanted fiber. By early 2015, HarperCollins expects that all overseas fiber will either be FSC-certified, PEFC-certified with a PREPS 5-star rating, or 100% recycled. Globally, 90% of this fiber will have chain of custody certification.

Implementation of Indonesian Commitments
Eliminating Controversial Sources and Maximizing Responsible Fiber

Taking supply chain action—to eliminate controversial/unwanted sources and to maximize preferred sources (recycled & FSC)—is a fundamental aspect of policy implementation and corporate social responsibility. Making or cancelling purchases is where the rubber meets the road in terms of sending clear market signals, leveraging change and realizing company values with supply chain partners.

Perhaps the most critical tool companies have in this regard is the contracts, purchase orders and other written commercial agreements used with direct suppliers as well as second- or third-tier suppliers and licensees. Leading companies are both informing these supply chain partners about the company's paper policy and requiring them to meet its requirements in contracts and agreements. Best practice includes specifying and contractually obliging supply chain partners not only to comply with the policy, but to meet specific performance requirements and gradual improvement targets that can be monitored and verified. These might include performance requirements and improvement targets relating to controversial fiber, transparency, certification, development of new sheets, etc.

In considering what sources are controversial or unwanted, leading companies and their suppliers consider both the content of their immediate supply chain and the broader policies and practices of the companies that are their supply chain partners. So, for example, best practice entails not only eliminating fiber from rainforests or associated with human rights violations from the paper companies buy directly, but also avoiding business with companies that have egregious practices more generally. They also apply this approach not only to direct suppliers but to second- and third-tier vendors and licensees.

In some cases, with existing suppliers or as a condition for starting or resuming business, buyers may set improvement targets that are verifiable, transparent, time-bound and contractually required. Similarly, with supply chain partners that are already responsible and show promise for becoming leaders, targets—such as producing an FSC-certified paper type—and incentives may be developed.

In all of these cases, relationships and information exchange are key elements of success. Further, best practice dictates that paper buyers be willing to create incentives—whether financial, contractual, etc.—for improvements and particularly for recycled and FSC-certified products.

LEADERS

Scholastic and Pearson/Penguin

Scholastic and Pearson/Penguin's verification program are perhaps the strongest in the industry. The companies' programs are well thought out and comprehensive—using a combination of verification tools. They clearly establish how the companies will respond if controversial/unwanted sources are discovered. Fiber tests are conducted on multiple books, multiple times per year, by an independent laboratory, and include not only the paper used for book pages, but also the fiber used for end papers and covers. If controversial fiber is discovered, use of that material is suspended pending an investigation; if the investigation confirms that controversial fiber was used, that material is removed from the portfolio.

Scholastic Inc. and Macmillan

The impact of the Scholastic paper policy has had a proven impact with its suppliers. Scholastic can cite multiple instances of working directly with suppliers to change paper recipes or eliminate controversial fiber to improve the environmental performance of the papers it purchases, and has also pushed several suppliers to earn FSC certification. This direct advocacy combined with rigorous implementation of a robust policy, makes Scholastic an industry leader.

Macmillan is leading the publishing industry to consider climate when purchasing paper. In addition to creating highly ambitious greenhouse gas emission targets, Macmillan's CEO speaks regularly on climate issues, and encourages other companies to follow suit. The company is committed to continual innovation on the issue of climate impacts within the paper and publishing sector.

Verification -- e.g. Independent Fiber Testing

To be credible, a company should require independent verification of its supply chain partners' progress in meeting its environmental, social and governance requirements and targets. Some critical verification tools include: fiber origin and species declarations/affidavits from suppliers; fiber testing and robust protocols to address and remedy inconsistencies when discovered; chain of custody (COC) and responsible forest management certification (with a preference for Forest Stewardship Council certification) and paper evaluation systems (PREPS); independent supplier site visits and audits; knowing the landscapes where suppliers are operating or sourcing from and using remote sensing and other independent data to track performance; etc.

The publishing sector is taking a lead in using these tools and creating transparency and accountability in its paper supply chains. Emerging best practice entails using several or all of these tools in combination. Of critical importance is establishing verification systems and protocols for steps to be taken when inconsistencies emerge or when non-compliance is found. This should include clarity that termination of business will be taken and clarity about conditions for changes required and for starting or resuming business.

Outreach and Work with Printers, Mills and Others

Effective supply chain action requires educating and working with supply chain partners—especially printers, mills, other vendors and licensees. These partners need information, explanation and encouragement if they are to understand and join the journey of improving the environmental and social impacts of paper.

Leading publishers consult with supply chain partners about their values and policies, sharing information and soliciting input and inviting them to develop and implement similar polices and to adopt consistent practices. Understanding the current capabilities of suppliers allows a publisher to strike the delicate balance between targets that are achievable yet ambitious, and to set the appropriate time horizons for each performance target. This process allows buyers to determine which suppliers they choose, (and with which incentives

or conditions) and which suppliers to avoid. Making these incentives or conditions public in a way that honors proprietary information gives suppliers confidence in the company's commitment, and multi-year targets allow mills and printers to incorporate this information into their own continual improvement processes.

Best practice relating to outreach also entails engagement with other key stakeholders—e.g. government, experts, civil society, peers, media—to educate and enlist them in providing expertise or influence, changing policies or practices or taking other actions that help facilitate or create the underlying conditions for environmental, social, economic and political changes needed to improve paper's overall footprint.
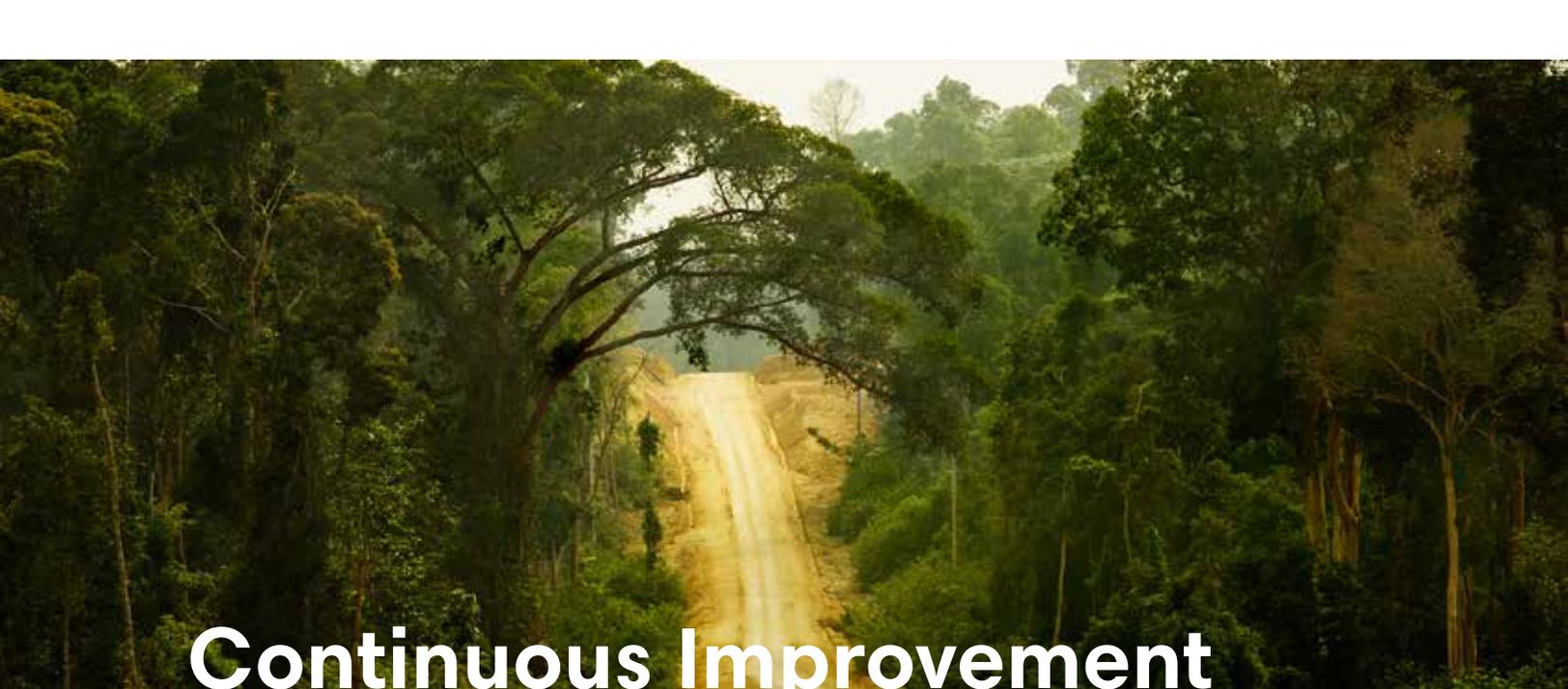
Continuous Improvement

Where Publishers Go From Here:

Different publishers are successfully leading innovation and implementation of best practices in different areas. Unfortunately, there are also publishers that are lagging significantly in several areas or, because of a lack of transparency, are failing to keep interested readers and others appraised of their positions or performance on social and environmental responsibility related to paper. Notable amongst these are Random House (*see page 22*) and Simon and Schuster.

And finally, there are still critical impact opportunities and key areas where individual publishers and the sector as a whole must continue to improve.

Work with printers, mills, vendors and other supply chain partners to develop and implement paper purchasing policies

Publishers must more deeply engage and advocate for change with their supply chain partners in order to leverage environmental, social, governance and transparency improvements. Working with printers, mills, and others to put paper policies in place that mirror their own and to monitor and require their implementation will help provide publishers more confidence in their fiber portfolio, and will help them ensure that their books are responsible.

At this time there is a critical impact opportunity for publishers to work with printers and mills to ensure that the fiber and suppliers they use are not linked to APRIL, TPL or affiliates controlled by Sukanto Tanoto or the RGE group.

Keep paper policies and targets current

Some publishers have drafted and adopted a paper policy and then congratulated themselves on a job well done. The paper policy is then never updated to extend targets or to reflect new realities on the ground or in the supply chain; no public progress reports are ever published; and it's unclear how or what the publisher has changed.

It is important for companies to keep their policies up to date, but also to continually push to integrate the best practices of the sector. Companies should make themselves aware of the emerging issues facing forests and forest-dependent communities. Companies should adapt and amend their policies every few years to reflect an ongoing commitment to these issues.

Drafting and adopting a policy is not enough—only a strong policy implementation with annual revisions can keep up with the changing nature of the publishing industry.

Strengthen Transparency and Reporting

Several publishers still lag behind their peers in the area of transparency and reporting. Most notably, Random House (*see page 22*) and Simon and Shuster must improve their transparency and reporting. Not only did these publishers fail to answer the survey sent out by RAN, but neither has up-to-date targets and reporting systems.

Institute robust fiber testing programs, and clear procedure when test reveals unwanted fiber

As the saying goes, publishers should "trust but verify." Without robust and independent fiber testing programs, publishers cannot be sure about what's actually going into their paper and ending up in the books they sell to consumers. Nor can they truly be sure about the environmental impact of their business, or the veracity of the claims they make to consumers and the public, all of which can have significant implications for their brand or their authors' brands.

Despite the remarkable progress in number of publishers using independent fiber testing, the test results published earlier in this report clearly indicate the importance of increasing testing and putting follow-up protocols in place that secure changes in supply chain partner behavior. Publishers must have a procedure in place for how to handle a positive test result for acacia or mixed tropical hardwood fiber in their books. Publishers need to communicate these procedures to suppliers so that suppliers understand the seriousness of a test result that indicates a policy violation.

Avoid sole reliance on PREPS or other grading and certification schemes

Third-party certification and grading schemes are an important part of verifying chain of custody (COC) and compliance with policies and requirements. However, these systems should not be the sole source of compliance verification. As indicated above, fiber declarations and tests, and where feasible independent audits and information from other credible parties, should be used hand in hand with certification and grading systems.

It is important that publishers truly understand exactly how or why certain fiber is preferred over other fiber. Only by direct engagement with paper suppliers and a robust testing program can publishers ultimately be confident about the fiber they use.

Preference FSC, instead of giving equal weight to all certifications

While FSC is not a perfect certification system, RAN joins a wide cross-section of analysts in affirming that FSC is the certification system that provides the best assurance of responsible forest management and credible chain of custody (COC) available today. As such, publishers looking for verification that the paper they purchase avoids controversial or unwanted sources and is consistent with their values and policies should prefer FSC. Comparison studies have found that other certifications, such as SFI, PEFC, and CSA, are simply not as rigorous, effective or credible as FSC.

There is a critical impact opportunity for publishers to work with printers and mills to ensure that the fiber and suppliers they use are not linked to APRIL, TPL or affiliates controlled by Sukanto Tanoto or the RGE group

Penguin Random House at a Crossroads

For the purposes of this report, RAN has separated Pearson/Penguin and Random House because we were surveying companies and testing books printed in 2013, before the Penguin Random House merger was complete. However, since the two companies merged last summer, Penguin Random House has become the largest trade publisher in the world.

As the two companies merge their policies and procedures regarding paper procurement and responsible paper sourcing, they face a great opportunity. In recent years, Random House has lagged behind other publishers in being transparent about its policy and performance and in implementing Indonesian forest commitments beyond children's books to all of its titles. Its policy and targets on paper and its protocols for implementing its Indonesian forest commitment are not public and it is not reporting on the progress it is making in either area. The company has a lot of work to do.

After becoming the first major publisher to adopt a comprehensive paper policy in 2006, Random House has since provided no public updates or revisions of its policy or targets. The company has declined to comment on progress toward targets or lack thereof.

Pearson/Penguin, on the other hand, has a good policy, clear performance targets that are made available to the public and regular reporting on implementation. It has strong protocols on verification and implementation of its policy and ongoing dialogue with stakeholders.

The merged Penguin Random House is at a crossroads—does it follow the secretive and deficient policy and performance of Random House or does it adopt and improve on Pearson/Penguins policy and systems? Penguin Random House could bring its standing up significantly by adopting Pearson/Penguin's paper policy, attitude towards transparency and robust verification systems. The new company should also follow Pearson/Penguin's lead and involve stakeholders in updating its policy and in ensuring that its policy is public and includes meaningful targets that are regularly reported on.

As the world's largest trade publisher, Penguin Random House has an important role to play as a leader in environmental and social responsibility. Unfortunately, the company is currently lagging behind its peers. It must take this opportunity to bring itself up to date and adopt best practices.

Conclusion

What's Next?

Publishers have worked hard to implement changes, and the publishing industry has demonstrated its commitment (for the most part) to transparency, continued improvement and transformation. We see leadership in key areas, where publishers are implementing their policies and commitments to responsible paper sourcing and innovating best practices that can be examples for other publishers and other sectors that purchase paper.

And while publishers alone cannot guarantee the survival of rainforests in Indonesia, the industry has the ability to affect change and create a positive impact. From here, publishers must continue to drive this change through their supply chain. By communicating with their printers, mills, and other vendors, publishers can help to ensure a transformation of the printing sector as a whole. This is especially important in China, which is fast becoming the leading paper manufacturing center in the world and is the largest consumer of pulp and paper from high-risk and controversial sources like Indonesia. In China, printers are leading paper buyers and have extraordinary potential to improve transparency and influence paper manufacturers.

RAN recommends that publishers continue to improve their policies and protocols for ensuring that controversial fiber does not make its way into the supply chain. It is not time to rest on laurels, but to ensure that all supply chain partners are taking on these critical issues. In addition, it is important that publishers continue to innovate, as well as to keep their policies and protocols up to date. Publishers are having a positive influence globally, for forests and communities. But the time has never been more critical to continue to improve.

Company Profiles

In the fall of 2013, RAN surveyed 10 publishers on the progress of their implementation of their commitments to eliminate controversial Indonesian fiber. We asked the companies questions in four areas (which correlate to what RAN has identified as best practices.) They were:

▶ **IMPLEMENTATION**
  (Best practice: Eliminating controversial fiber and maximize responsible fiber)

▶ **VERIFICATION**
  (Best practice: Independent fiber testing)

▶ **ADVOCACY**
  (Best practice: Outreach and work with printers, mills and others)

▶ **POLICY**
  (Best practice: Policy and targets; Transparency and reporting)

Based on these survey results, their public paper policies, and follow-up conversations with those companies, we have assessed the companies, in relation to their peers, in each of the four survey areas.

CANDLEWICK PRESS

Overview:

Candlewick leads in two areas: strong willingness to advocate within its supply chain and strong implementation protocols. That being said, there is still a lot the company could be doing in terms of making its verification protocols more robust and updating its policy with time-bound, measurable targets. While the company has expressed some willingness to take this on, time will tell whether Candlewick will rise to the challenge of best practices across the board.

Implementation: *Above average relative to peers*

» All requests for proposals, purchase orders, and contracts issued by Candlewick include language to exclude controversial Indonesian fiber and other unwanted sources.

Verification: *Below average relative to peers*

» Candlewick currently relies on the PREPS database to determine fiber suitability, but is in the process of implementing quarterly independent fiber testing for core sheets and key vendors. There is a process in place to audit and investigate if controversial fiber is found.

Advocacy: *Above average relative to peers*

» Candlewick has expressed a willingness to ask printers to develop their own paper policies, which is positive. Currently, they preference printers who have paper policies in place, or who avoid controversial Indonesian fiber. In the past, Candlewick has canceled a purchasing relationship because the supplier was sourcing from APP.

Policy: *Below average relative to peers*

» Candlewick's policy does not include quantitative targets, just language to "maximize" use of FSC and recycled fiber "where appropriate."

» Notwithstanding the lack of formal targets in the policy, Candlewick's current usage of FSC fiber is good, with goals to increase this usage every year.

» Additionally, the public text of the paper policy does not discuss recycled fiber at all.

» Finally, there is no written implementation plan for the policy.

Areas for Improvement:

» The paper policy is below average relative to industry peers, with no quantitative or time-bound targets and no public reporting.

» Candlewick's current usage of recycled fiber is unclear

» There seems to be a general need for more robust tracking systems to understand fiber usage.
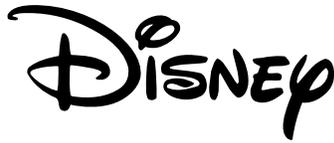
Disney

Overview:

In October 2012 Disney adopted a comprehensive paper policy with strong provisions for eliminating unwanted sources and maximizing responsible fiber. The policy guides paper procurement throughout Disney's entire global operations, including the paper sourcing of thousands of Disney licensees. Disney is implementing its policy across all its business units so remains in the early stages of implementation, but its current focus on creating robust tracking and verification systems should lay a solid foundation for future implementation. Disney's commitment to stakeholder engagement and public reporting set a strong example of corporate transparency and accountability.

Implementation: *average relative to peers*

» Disney commits in its paper policy to eliminate unwanted sources and has eliminated them from North American Disney Book Group and Hyperion.

» The company is developing a paper tracking system and database for use by Disney procurement officers and will develop an implementation plan for its licensees over the coming year.

Verification: *average relative to peers*

» Disney has processes for an annual paper survey, on-site audits, fiber testing and classifying high-risk areas for paper used in its day-to-day business operations and branded products and packaging sourced by Disney. The company will also utilize independent certification and fiber declarations in its fiber tracking and due diligence process.

» Disney expresses a preference for recycled and FSC-certified papers, and for high-risk regions, requires use of 100% FSC-certified or recycled paper.

Advocacy: *average relative to peers*

» Disney communicates its paper policy to all suppliers, vendors and licensees and shows preference for suppliers who share its commitment to forest conservation.

» Disney will conduct supplier risk assessments and communicate and act on results with suppliers.

Policy: *above average relative to peers*

» Disney's policy is comprehensive and global; its scope makes it a leadership policy. It includes strong language on exclusion of controversial sources.

» The policy contains time-bound goals guiding implementation of the policy and annual public reporting is strong

Room for Improvement:

» Until the policy is fully implemented, Disney remains exposed to unwanted fiber; the company should take accelerated action to eliminate unwanted fiber from direct suppliers and licensees in high risk regions

» Disney should move its implementation goals to quantifiable, deliverable-based targets and include targets for licensees.

» Disney should further use its leverage with supply chain partners to explain its policy, convey needed reforms and to secure improved environmental and social performance with overseas printers and others in the pulp and paper industry.

Overview:

Hachette has a very strong policy, and leads the industry in its excellent reporting on the implementation of its commitments. That being said, Hachette seems to rest on its laurels, and could be making greater strides in the areas of verification, by doing its own fiber testing. Hachette could also be a stronger advocate with printers and supply chain partners, by encouraging and working with printers to develop their own policies.

Implementation: *average relative to peers*

» Hachette has committed to avoiding controversial sources, including controversial suppliers APP and APRIL and affiliates. Hachette has contracts and purchase orders that require vendors and paper mills to meet its policy.

Verification: *below average relative to peers*

» Hachette relies on certification and other paper assessment systems (PREPS) for paper due diligence and evaluation and to address issues that come up with controversial fiber and suppliers. Hachette conducts no independent fiber testing and does not require fiber origin and species declarations.

Advocacy: *below average relative to peers*

» Hachette has shared its corporate paper policy with printers and paper suppliers and continues to reinforce the policy with its suppliers through ongoing conversations.

» To date, Hachette has not communicated with printers and vendors about developing their own paper procurement policies.

Policy: *above average relative to peers*

» Hachette has the only policy in the publishing industry that sets a goal for the reduction of corporate greenhouse gas emissions.

» Hachette has a strong policy, updated in the last two years, with recycled and

» FSC targets that are among the most aggressive in the US publishing industry.

» Hachette does thorough and highly transparent reporting.

Areas for Improvement:

» Hachette has an opportunity to adopt best practice by using more verification tools, including independent fiber testing and fiber declarations to ensure that unwanted sources are not making their way into the supply chain, though HBG is considering doing so.

» Hachette has the opportunity to engage its supply chain partners to better realize the values reflected in its policy. The company should be proactive in working with printers to develop comprehensive paper procurement policies, maintain a "no buy" position on APRIL and APP and escalate pressure on paper mills using APRIL pulp to cut ties with the company.

» The next time Hachette reviews its policy it should extend the company's values on climate and respect for human rights by including language on respecting human rights and protecting high carbon stock forests and peatlands.

HarperCollinsPublishers

Overview:
HarperCollins has improved dramatically since RAN's initial assessment of publishers. The company is doing strong work in a number of categories, but stands out in its requirements for excluding controversial fiber and the implementation of its paper procurement policy.

Implementation: *Above average relative to peers*
» HarperCollins does an excellent job of excluding controversial fiber and suppliers, including APP and APRIL.
» Overseas paper specifications are quite strict, requiring FSC-certified sheets or PREPS 5-star sheets for fiber coming from controversial regions.

Verification: *Above average relative to peers*
» HarperCollins requires all overseas vendors to submit fiber profiles, a good check against unwanted fiber making its way into the supply chain.
» The company conducts independent fiber testing using a well thought out program and has clear policies in place if a sheet comes back with controversial fiber.

Advocacy: *Average relative to peers*
» HarperCollins has demonstrated willingness to work with mills and printers to meet both its business needs and environmental requirement, on multiple occasions.

Policy: *above average relative to peers (with some caveats)*
» The policy contains quantitative, time-bound, multi-year goals and fairly aggressive targets for FSC fiber.

Areas for Improvement:
» The next iteration of HarperCollins' paper policy should include clear goals for recycled fiber and language on human rights, peatlands and high carbon stock forests.
» A public stance about HarperCollins' commitment to not source from APP/APRIL would send a stronger message.
» There is an opportunity for HarperCollins to continue to improve its US fiber portfolio.

Overview:

Houghton Mifflin Harcourt has made significant strides in the last few years. WIth the release of their public commitment on responsible paper procurement, the company has set strong, measurable targets; laid out a strong set of criteria for eliminating controversial sources; and developed a thoughtful fiber testing program. If fully implemented, this policy and HMH's recent commitments could translate to positive action within its supply chain. While there have been no public reporting yet on its progress, HMH appears to be taking some positive steps.

Implementation: *above average relative to peers*

» Houghton Mifflin Harcourt has a robust definition of controversial sources in its paper policy, which includes language on human rights, biodiversity, high-carbon landscapes (including peatlands), and genetically modified organisms.

» The company convenes a Green Paper Task force to ensure the policy is implemented company-wide, and that there is frequent tracking of the company's goals.

Verification: *above average relative to peers*

» HMH conducts quarterly fiber tests on finished books, which helps to determine veracity of supplier claims.

» HMH has recently expanded its testing and fiber declaration requests company-wide.

Advocacy: *average relative to peers*

» HMH is willing to engage suppliers in conversation about controversial fiber and paper policies, including asking them to develop paper policies, but has taken little concrete advocacy action to date.

» The company's new policy has clear language that preferences printers that have policies, and contains systems for eliminating printers that are not in compliance with HMH's environmental guidelines.

Policy: a*bove average relative to peers*

» HMH's policy includes measurable and time-bound goals for recycled and FSC fiber, as well as a robust definition of controversial sources.

» The policy provides a clear plan for implementation, including procedures for monitoring, evaluating and annual reporting of progress towards its goals.

Areas for Improvement:

» Houghton Mifflin Harcourt has the opportunity to create major shifts on the ground, should it follow through with the commitments laid out in its policy.

» The company should ensure that its targets are updated regularly and that transparent reporting takes place on schedule in order for the company to remain accountable to its promises.

MACMILLAN

Overview:
Macmillan stands out amongst publishers for its strong public stance on climate change and its commitment to reducing greenhouse gas emissions. With its recently published paper policy, Macmillan has gone beyond its initial Indonesian forest commitment and most of its peers by including clear language on climate and human rights.

Implementation: *above average relative to peers*
» Macmillan will not use non-certified fiber sourced or milled in Indonesia; it has committed not to source from controversial Indonesian sources until reforms are undertaken and independently verified.
» All papers from Asian vendors are at least PREPS 3-star rated; over 50% is FSC-certified.
» Macmillan will start requiring that all sheets from high-risk regions or sourcing fiber from high-risk regions (e.g. Laos, Indonesia) be FSC-certified.

Verification: *average relative to peers*
» Macmillan conducts twice-annual random fiber testing of finished books printed in Asia; there is some allowance for problematic fiber potentially from recycled content.
» Macmillan even tests multiple printings of the same book to ensure that paper recipes have not changed without notification.

Advocacy: *above average relative to peers*
» Macmillan has taken a strong public position on climate change and urged others in their supply chain to do the same.

» Macmillan has engaged with Asian printers to specify new sheets that meet environmental requirements, or to prevent controversial Indonesian fiber from being used.
» The company has also asked printers to develop paper policies, and preferences printers that do.
» Macmillan has identified and sourced lower or lowest CO_2 emission papers for North American production; it also built incentives and penalties into contracts tied to emissions-related criteria.

Policy: *average-above average relative to peers*
» Macmillan's policy is good overall, with some elements, such as those on climate and human rights, above those of its peers. Its willingness to see most certification systems as equivalent, however, lags behind its peers.
» While the company has no quantitative or time-bound targets for certified or recycled content, it does contain targets related to known COC and fiber of origin (75% by 2015, 95% by 2020).

Areas for Improvement:
» Macmillan continues to treat SFI, PEFC, and CSA as equivalent to FSC.
» The strong focus on CO_2 emissions is laudable, but could dilute company action on environmental impacts (e.g. endangered species).
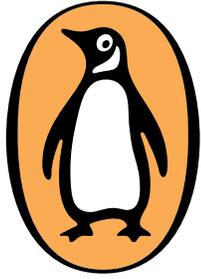
Overview:

Pearson/Penguin is a leader in the sector, particularly with reference to its verification and testing protocols and paper policy. In the summer of 2013, Penguin merged with publishing giant Random House, which lags in a number of key performance areas. If Penguin Random House fails to adopt Pearson Penguin's superior policy and practices, the company—the world's largest trade publisher—will miss a crucial opportunity and bring down its own reputation as well as that of the sector.

Implementation: *average relative to peers*

» Private commitment not to purchase from problematic suppliers APP/APRIL; APP/APRIL do not meet supply criteria.

» Seem to have clear sense of where controversial fiber might be entering the supply chain and how to address the problem.

Verification: *above average relative to peers*

» Penguin/Pearson conducts independent fiber tests using a testing protocol that is well thought out.

» Tests are conducted twice per year and are extensive, including paper for pages as well as fiber used for end papers, covers, and the bodies of books.

» If problematic fiber is discovered, Pearson/Penguin suspends use of that paper/resource pending an investigation. If the investigation is not satisfactorily resolved, Pearson/Penguin removes the questionable paper/resource from its supply portfolio.

Advocacy: *average-below average relative to peers*

» Pearson/Penguin has engaged stakeholders such as WWF's Forest and Trade Network and PREPS in developing and implementing its policy but has relied too much on other institutions to forward its objectives with key paper industry participants like printers and mills

» Pearson/Penguin has yet to take decisive action with printers and paper mills, advocating for solutions, other than communicating its minimum purchase requirements. These efforts are insufficient to drive change.

Policy: above average relative to peers**

» Pearson/Penguin has a strong policy. It could be improved by setting more specific targets for recycled and FSC and setting longer-term targets.

» The policy has been revised several times since its adoption, demonstrating a culture of continual improvement.

» With its robust public reporting, Pearson/Penguin is demonstrating excellent transparency.

Areas for Improvement:

» In its merger with Random House, Pearson/Penguin should urge Penguin Random House to adopt its paper policy and associated practices.

» Pearson/Penguin has the opportunity to engage with its supply chain partners in a more proactive and effective way. Specifically, Pearson/Penguin should work with printers to develop comprehensive paper procurement policies, maintain a "no buy" position on APRIL and APP and escalate pressure on paper mills using APRIL pulp to cut ties with the company.

» Pearson/Penguin gives less credible and robust certification programs (SFI, CSA) equal weight with FSC. Pearson/Penguin should give clear preference for recycled and FSC-certified sheets.

» The policy would be strengthened by incorporating language about human rights and greenhouse gas targets and emissions, as well as more comprehensive targets and longer-term milestones.

RANDOM HOUSE

BERTELSMANN

Overview:

Random House has fallen behind its peers in the publishing industry in several respects. The company's purchasing policy is not public, and Random House does not report publically on its performance and progress. Although it has made commitments on eliminating controversial Indonesian and other sources, it has not disclosed information on the implementation of these commitments or on its verification and advocacy activities.

In July 2013, Random House merged with Penguin, making it the world's largest trade publisher. RAN believes this position brings with it responsibilities concerning transparency, the environment and human rights. Random House's lagging performance is bringing down the excellent performance of its new partners Penguin and minority shareholder Pearson. It is also brining down the performance and reputation of the entire sector. The merger is a crucial opportunity for both companies as well as the whole sector. Random House would do well to adopt Penguin/Pearson's paper policy and approach to corporate social responsibility more generally.

Implementation: *below average relative to peers*
  » Random House has no written or public commitment regarding the elimination of controversial fiber and suppliers.
  » Random House, in the context of the merger, should make a public commitment to eliminate controversial Indonesian and other fiber, and establish measurable targets for maximizing responsible fiber, including FSC-certified paper and recycled content across all of its operations.

Verification: *below average relative to peers*
  » Random House does use fiber declarations and conduct fiber testing, at least for its children's division, but overall the company's commitments and practices are unclear. It is also unclear what the protocol is in the event that unwanted fiber is discovered.

Advocacy: *below average relative to peers*
  » Random House's children's division engages printers and supply chain partners on its commitment to avoid controversial Indonesian sources. However, since that policy and scope of the controversial Indonesian sources commitment is not public, it is unclear what specific expectations and requirements Random House extends to its vendors across the board.
  » As far as RAN can tell, Random House has not encouraged printers to develop paper policies, nor does it preference such printers.

Policy: *below average relative to peers*
  » Random House announced its policy almost eight years ago, but the company never publicly released it. There have been no updates since the announcement, which suggests that the policy is badly out of date.
  » Recycled fiber targets are quantitative, but expired in 2010, and Random House has no FSC target. Targets must be updated and should include a target for FSC fiber.
  » The policy commits to annual reporting starting in 2007, but no reports have ever been published.

Areas for Improvement:
  » Since this one-time industry leader has taken little to no action in the last seven years, Random House has fallen well behind its peers.
  » Besides conducting fiber tests for its children's book divisions, it is difficult to identify any positives related to environmental paper initiatives.
  » Outside its children's book division, Random House appears to have adopted none of the best practices that RAN has identified as consistent with responsible paper purchasing.

Overview:

Scholastic consistently ranks above average in all categories. The company has conscientious protocols in all areas of the survey. In fall of 2013, Rainforest Action Network profiled Scholastic for its leadership. Scholastic's practices set the standard for rigorous implementation and verification of paper procurement policies.

Implementation: *above average relative to peers*

» Scholastic is currently not sourcing any controversial Indonesian fiber, and has specifically excluded fiber from problematic suppliers APP, APRIL, and their subsidiaries.

Verification: *above average relative to peers*

» Scholastic has established a rigorous fiber-testing program conducted by an independent third party. Further, mills must notify Scholastic when paper recipes change.

Advocacy: *above average relative to peers*

» Scholastic has a good track record of working with suppliers and peers directly, as well as through industry groups, to remove problematic fiber and change industry practices. The company has also expressed a willingness to ask printers to develop environmental paper policies; currently, they preference printers that avoid controversial sources.

Policy: *above average relative to peers*

» Scholastic's policy is a strong comprehensive policy with time-bound quantitative goals.

» Additionally, the language in Scholastic's purchase orders and contracts with supply chain partners is robust, in terms of eliminating controversial fiber and suppliers.

» Public reporting on its goals has been good to date. Scholastic exceeded its 2012 FSC goal of 30%, increased the goal to 35% by 2015, and then exceeded that goal at 68%. And while the company fell short of its 2012 recycled goal of 25% (achieved 18.2%), Scholastic stuck with the goal, extending it to 2015.

Areas for Improvement:

» Scholastic could continue to improve by setting multi-year goals that escalate over time.

SIMON & SCHUSTER

Overview:

RAN has previously profiled Simon & Schuster as a leader. Recently, however, Simon & Schuster has lagged behind while its peers are stepping up. The company's policy needs to be updated, since current targets are out of date. Simon & Schuster also needs to improve transparency and reporting and take proactive steps toward the implementation and verification of its Indonesian forest commitment.

Implementation: *below average relative to peers*

» There is no firm commitment regarding the elimination of controversial fiber and suppliers, only vague language, like "endeavor" to eliminate.

Verification: *below average relative to peers*

» Simon & Schuster has nothing written or public about its verification protocols or methodology. We must assume that there is no fiber testing program or other verification tools in place.

Advocacy: *below average relative to peers*

» Simon & Schuster has nothing written or public about its advocacy or communication with printers, vendors, suppliers or other supply chain partners. We must assume that there is no direct advocacy with printers taking place.

Policy: *below average relative to peers*

» Simon & Schuster had a firm target of 25% recycled content, but the goal date was 2012 and there have been no updates in the last four years.

» There is a similar difficulty with an outdated FSC target from 2012. Additionally, the FSC target is not firm: the language says the company will "endeavor" to have 10% FSC fiber (which is a low number, anyway, compared with peers).

Areas for Improvement:

» Simon & Schuster's policy is out of date and badly needs updating; targets lag well behind current industry expectations and best practices.

» It is unclear that any action is being taken with implementing and verifying processes to prevent the use of controversial fiber.

» There is an opportunity for Simon & Schuster to do direct engagement with its supply chain partners, but there is no evidence that this is happening.
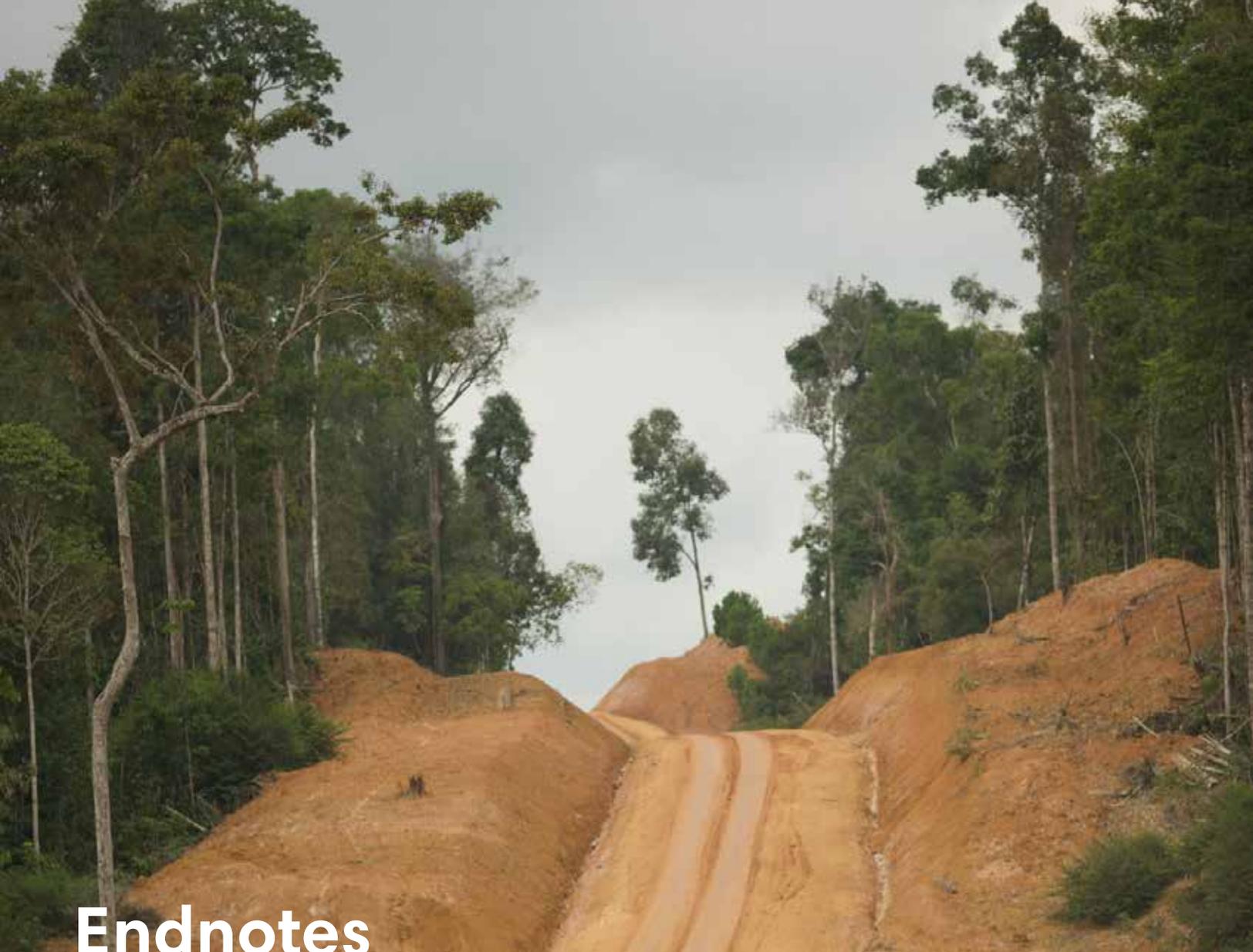
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