

# Commentary on Sustainable Sourcing Code for Paper

## Introduction

“Sustainability” is a term that indicates a state of sustainable development through harmony among Environment, Society, and Economy. The policy of the International Olympic Committee (IOC) also clearly states “include sustainability in all aspects of the Olympic Games.” Taking this policy, the Tokyo 2020 Games has decided to work on consideration for sustainability from various aspects in its preparation and operation. One of the related efforts is sustainable sourcing of products and services

For paper, efforts have been made in Japan to recycle wastepaper and ensure legality of virgin pulp since early on, but, in recent years, “sustainability” has become a global trend with the need for more environmental and social considerations being increasing and certification systems having been developed and disseminated.

For this trend, the Sustainable Sourcing Code for Paper was formulated so that sustainability in the production stage is ensured for paper to be used for the Tokyo 2020 Games.

Meanwhile, the concept of sustainability, at which the Tokyo 2020 Games aim, has not yet been fully penetrated among both enterprises and consumers in Japan. For this reason, these Commentaries were prepared with concise explanations on the points of the Sourcing Code, so that enterprises and consumers can deepen their understanding of the meaning of and necessary efforts for sustainability.

With its principal target being to realize the sustainable Games through the sourcing of paper that meet the Sourcing Code, Tokyo 2020 also considers it important that the Tokyo 2020 Games will provide enterprises in Japan with an opportunity to work on the sourcing of sustainable paper, and that this will lead to the enhancement of sustainability awareness among businesses and consumers in Japan and the long-term expansion of commitments toward the sourcing of sustainable paper. Tokyo 2020 believes that efforts toward the sourcing of sustainable paper will thus become an important legacy of the Games.

We expect that the standards of sustainability will be raised in the industry as a whole, with people concerned in all stages making efforts with high level of awareness through the Sourcing Code and these Commentaries.

## Commentary for Each Section

The details of the Sourcing Code for paper will be explained one by one.

**In addition to the Sustainable Sourcing Code, the below Sustainable Sourcing Code for Paper provides a framework for sustainable procurement of paper used for products, services, etc. procured by the Tokyo 2020 Organising Committee (hereinafter “Tokyo 2020”).**

### <Commentary>

This section indicates that the Provisions of 4 to 6 of the Sustainable Sourcing Code (main text) are also applied to paper. For instance, it is required to meet “4. Standards for Sustainability” that stipulates ban on discrimination & harassment and forced labour & child labour during production and distribution of procured products, etc., as well as ban on misleading representation in marketing of procured products, etc. Also, there is a case where Tokyo 2020 confirms whether suppliers and licensees are complying with the Sourcing Code based on “5. Verification Procedure.” Furthermore, based on “6. Grievance Mechanism,” reports on non-compliance with the Sourcing Code (main text as well as individual codes) will be received.

**1. The targets for this Sourcing Code are paper (including Japanese paper) to be used for items as follows:**

**Posters, handouts, pamphlets, books & reports, tickets, honorable certificates, copier paper, notebooks for business use, envelopes, business cards, toilet paper, tissues, paper napkins, paper bags, paper plates, paper cups, and casings for licensed products**

### <Commentary>

Paper and paper products specified in this section must meet the Sourcing Code. This requirement applies to ready-made paper and paper products purchased by Tokyo 2020 as well as to paper and paper products used by printing contractors or manufactured by outsourced manufacturers. “Books & reports” means books and reports published for external communication. As for licensed products, casing used for packing them is subject to the Sourcing Code.

It is also expected that other paper and paper products than specified in this section used, manufactured, or otherwise supplied for the Tokyo 2020 Games will meet the Sourcing Code as much as possible.

**2. Types of paper mentioned above in Section 1 are required to meet the conditions from (1) to (3) as follows from a perspective of sustainability:**

**(1) Wastepaper pulp is used as much as possible according to the applications and properties of products.** <sup>(Note 1)</sup>

**(2) In the case of using pulp other than wastepaper pulp (hereinafter “virgin pulp”), wood and other related materials for virgin pulp (incl. thinned wood, non-wood such as bamboo and reeds, and paper mulberry and paperbush for Japanese paper, and excl. lumbering chips, construction waste, forest scraps, and fiber from waste plants) satisfy the conditions from (i) to (v).**

**(i) Procedures for harvesting have been properly taken with reference to laws and regulations related to forests and other harvesting places of the country or region where the raw wood and other related materials were harvested.**

**(ii) Wood and other related materials are derived from a forest or other harvesting place which has been managed based on a mid-to-long-term plan or policy.**

**(iii) In harvesting, the ecosystem is conserved, and the environmentally important areas, under which peat lands and natural forests could fall, are properly conserved.**

**(iv) In utilising forest or other related area, indigenous and other local peoples’ rights are respected, and free, prior, and informed consent formation system has been secured.**

**(v) Safety and hygiene measures for workers who engages in harvesting have been properly taken.**

**(3) The whiteness of the paper is not excessively high, the coating amount is not excessively great, and any processes which make paper recycling difficult have not been applied, according to the applications and properties of products.** <sup>(Note 2)</sup>

**Note 1 and Note 2: For copier paper, notebooks for business use, etc., their wastepaper-blending ratio and whiteness may be specified, with reference to the Tokyo Green Purchasing Guide.**

<Commentary>

This section provides the requirements regarding raw materials of paper as well as those that must be satisfied during harvesting of raw materials, manufacturing of paper, and other processes.

The condition (1) requires the maximum use of wastepaper pulp to promote the effective utilization of resources. There may be cases where the wastepaper-blending ratio may be specified in specifications. Particularly in cases where paper subject to the Tokyo Green Purchasing Guide is used, its wastepaper pulp-blending ratio must at least satisfy the standard set by the guide.

Notwithstanding the foregoing, there may also be cases where the use of 100% virgin pulp paper that contains no wastepaper pulp may be requested for certain applications, such as paper containers used for foods and beverages and printed materials with many photographs.

Specific requirements will be provided as needed in specifications issued for each order by taking account of the level of quality required for a particular application, products currently available for procurement, and other factors.

The condition (2) shows the requirements (i) to (v) regarding wood and other related materials used for the production of virgin pulp, which must be satisfied when using paper that contains virgin pulp ( paper made from a mixture of 70% wastepaper pulp and 30% virgin pulp, paper made from 100% virgin pulp, etc.).

Virgin pulp manufactured from thinned wood, bamboo, reeds, kenaf, paper mulberry, paperbush, and other wood/non-wood materials must meet these requirements. On the other hand, virgin pulp made from lumbering chips, construction waste, forest scraps, and fiber from waste plants (e.g., bagasse (the pulp remaining after the extraction of juice from sugar cane), shells of coffee beans) (hereinafter, collectively, “lumbering chips, etc.”) does not have to meet these requirements, but suppliers need to be able to present evidence that their virgin pulp paper is produced from lumbering chips, etc.

The following are explanations about the purpose and content of each of the requirements (i) to (v). The method to confirm that raw materials of virgin pulp meet the requirements (i) to (v) is as set forth in Section 3.

In (i), it is required that harvesting of raw wood and other related materials of virgin pulp be conducted in accordance with the country’s or region’s laws and regulations governing forests and other harvesting sites.

Wood obtained by improper harvesting, such as harvesting that is not officially permitted (including harvesting of the materials with a greater quantity or size than permitted), harvesting in areas where harvesting is prohibited, or harvesting of tree species that are prohibited to be harvested, may not be used.

In (ii), it is required that a forest or other site in which the wood and other related materials used were harvested be under planned control in order to prevent the forest or site from becoming bare land or left neglected through unplanned logging or other exploitation.

In (iii), it is required that measures be taken to prevent harvesting and other operations from damaging rare flora and fauna, as well as to conserve peatlands, rare natural forests, and other important ecosystems that need to be protected, where applicable.

Peatlands are a type of swampy wetlands in which highly flammable peat accumulates. If a fire occurs in a peatland, it is likely to last long and may cause a smoke pollution and large

emissions of CO<sub>2</sub>.

In (iv), it is required that when forests and other harvesting sites where the wood and other related materials used are harvested are involved in the rights of indigenous or other local peoples, procedures or processes aimed for free, prior and informed consent (FPIC) be implemented to respect their rights.

In (v), it is required that safe and hygiene work environments be maintained for workers engaging in harvesting the wood and other related materials used, by, among other measures, providing safety and hygiene education to the workers and ensuring that the workers wear appropriate safety gears.

The condition (3) requires bleaching, coating, and processing processes in the production of paper to be environmentally considerate. Because bleaching and coating involve the use of chemicals and energy, which generates an environmental impact, it is stipulated that the whiteness and coating amount of paper should not be excessive in order to reduce the impact. Particularly in cases where paper subject to the Tokyo Green Purchasing Guide is used, the whiteness and coating amount, in principle, will be required to satisfy the standards set by the guide. Even in the case of products for which the required levels of whiteness or coating amount are not specified, it is desirable to choose unbleached or uncoated products if they do not necessarily require white color, such as paper napkin.

Furthermore, paper that can be recycled after use is preferable as such paper is more beneficial for the effective use of resources. Unless specified otherwise for particular applications, suppliers are encouraged to choose paper that is not processed in such a way that hinders recycling.

Here again, specific requirements will be provided as needed in specifications issued for each order by taking account of the level of quality required for a particular application, products currently available for procurement, and other factors.

**3. Types of paper, for which virgin pulp that satisfies the conditions from (i) to (v) of (2) of Section 2 mentioned above is used, include FSC- and PEFC-certified paper (incl. SGEC-certified paper) <sup>(Note 3)</sup>. In the event that suppliers need paper without any certification above, wood and other related materials, which are raw materials of the virgin pulp, shall be confirmed in terms of the conditions from (i) to (v) above through the procedure designated in the appendix.**

**Note 3: The paper is needed to be continuously CoC-certified.**

<Commentary>

This section stipulates that existing certification schemes can be utilized as a method to

confirm that virgin pulp used satisfies the requirements of Section 2 (2).

Paper certified by one of the certification schemes named here, FSC or PEFC (including SGEC), is deemed as having met all the requirements (i) to (v) in Section 2 (2).

For the procedure for using other paper than that certified by these schemes, please refer to Appendix at the end of this Commentary. Cases in which the use of paper other than certified paper is expected include Japanese paper (*washi*) products and printing service contracts that require the use of special paper.

Reference

FSC

The Forest Stewardship Council (FSC) is an internationally-recognized forest certification system established mainly by environmental NGOs and its certification covers a total area of 195,170,000 hectares worldwide as of December 2017.

URL: <https://jp.fsc.org/jp-jp>

PEFC

The Programme for the Endorsement of Forest Certification (PEFC) is an internationally-recognized forest certification system established by national organizations from 11 European countries. PEFC is promoting mutual recognition with other forest certification schemes around the world, and its certification covers a total area of 313,490,000 hectares worldwide as of December 2017.

URL: <https://www.pefc.org/>

SGEC

The Sustainable Green Ecosystem Council (SGEC) is Japan’s forest certification system. Because of its mutual recognition with PEFC, wood and wood products certified by SGEC can be deemed as certified by PEFC as well.

URL: <https://www.sgec-eco.org/>

**4. Suppliers <sup>(Note 4)</sup> shall keep documents with the records of paper to be used in terms of (1) to (3) of Section 2 mentioned above until one year after the Tokyo 2020 Games, and submit such documents when Tokyo 2020 requires them to do so.**

**Note 4: For licensed products, “suppliers” means “licensees” (The same applies hereafter).**

<Commentary>

It is necessary for Tokyo 2020 to be able to check that paper actually supplied or used is compliant with the Sourcing Code.

For this reason, this section requires suppliers to keep documents that give a rational explanation of the status of their compliance with the Sourcing Code (e.g., information regarding certification obtained) and, upon request from Tokyo 2020, disclose the documents and provide an explanation.

More specifically, suppliers are requested to note information on the paper supplied or used—such as wastepaper-blending ratio, certification obtained, and level of whiteness—in the remarks field or other space in the delivery notes/reports (*nohinsho*), or other documents submitted at the time of delivery or completion of a service (if such information can be obtained from product information provided on the manufacturer’s website or catalogue, suppliers can choose to submit the product information instead). In the case of printing service contracts that require the submission of a Material Confirmation Sheet, suppliers will be requested to add information such as information on virgin pulp certification.

**5. Suppliers are recommended to collect the information such as concerns related to the place of origin of raw materials and production business operator of said paper where possible, including the perspective of securing the traceability to the harvested area, and to utilise the collected information, with its credibility and objectivity in mind, in order to reduce the risk of procuring from a business operator that produces paper which does not meet the conditions of Section 2.**

<Commentary>

The Sourcing Code requires that virgin pulp, if it’s used, satisfy the provisions of Section 3, but this alone cannot eliminate all risks. For this reason, in addition to security provided by the certification schemes and other means, this Section 5 is provided as an additional measure recommended to be taken to further decrease sustainability risks, which involves collecting sustainability information.

More specifically, suppliers are recommended to collect and analyze as much information as possible regarding the place of origin, local manufacturers, and others to identify any issues that may be occurring, such as illegal operations, environmental destruction, human rights violation, forced labour, or child labour. If it is considered highly likely that procured products may fall short of meeting the Sourcing Code, suppliers are expected to conduct additional confirmation, among other actions.

Because the manufacturing and distribution patterns of paper vary widely, Tokyo 2020 does not intend to standardize the content of information that should be collected or the way the content is evaluated. However, suppliers should collect information from well-balanced sources (including reports from NGOs, news from mass media, and information from companies and the local government) because the sources and their backgrounds and intentions may be diverse, and carefully evaluate the credibility and objectivity of information collected in order not to unfairly reject certain products, manufacturers, or the like by relying on unreliable information without

sufficient verification.

**6. To reduce the risk of wood from illegal logging being distributed in Japan, with reference to the aim of the Act on Promotion of Use and Distribution of Legally-Harvested Wood and Wood Products, it is recommended that supply chains <sup>(Note 5)</sup> be wood related business operators registered based on the Act, and with regard to paper subject to the Act, suppliers should preferentially select one provided by the registered wood related business operators.**

**Note 5: They are limited to business operators in Japan, and fall under wood related business operators stipulated in the Act on Promotion of Use and Distribution of Legally-Harvested Wood and Wood Products.**

<Commentary>

As the Act on Promotion of Use and Distribution of Legally-Harvested Wood and Wood Products or more commonly known as the “Clean Wood Act,” enacted to promote the use of legally-harvested wood and wood products, is gaining greater attention, this section recommends—from a long-term perspective that goes beyond the Tokyo 2020 Games with a view to helping reduce the risk of wood from illegal logging being distributed in Japan—that businesses in supply chains of paper procured should be ones registered under the act (i.e., wood related business operators properly and reliably implementing legality verification and other measures that they are expected to take).

Suppliers are also encouraged to preferentially select paper provided by registered business operators. In other words, products supplied from registered paper manufacturers in Japan and paper importers are desirable.

Please see the website of the Forestry Agency for the provisions of the Act on Promotion of Use and Distribution of Legally-Harvested Wood and Wood Products and the list of registered wood related business operators.

Act on Promotion of Use and Distribution of Legally-Harvested Wood and Wood Products  
 (“Clean Wood Act”)

<http://www.rinya.maff.go.jp/j/riyou/goho/summary.html>

List of registered wood related business operators

<http://www.rinya.maff.go.jp/j/riyou/goho/jissikikan/jissikikan.html#jigyousha-ichiran>



## **Appendix (Confirmation procedure in the cases other than certified paper)**

**The confirmation procedure mentioned in the latter part of Section 3 of the Sustainable Sourcing Code for Paper (hereinafter “the Sourcing Code”) is as follows.**

**Concerning each of conditions from (i) to (v) of (2) of Section 2 of the Sourcing Code, paper makers (in the case of milling paper in Japan) and import business operators (in the case of importing paper having milled overseas) shall confirm the following matters by rational method in terms of accountability, and record the results in a written format.**

- (i) Said wood and other related materials have been harvested through legally necessary procedures of the producing country or region.**
- (ii) The forest or the related area, in which said wood and other related materials are harvested, has been approved for forest management or other related plans, or the land owner, etc. has a plan or a policy related to management and maintenance of the forest or the related area.**
- (iii) Appropriate conservation measures have been taken for harvesting and other activities, in the cases where the forest or the related area is a habitat for any of rare plants and animals; and in the cases where the forest or the related area has any of important forests and areas to be protected, such as peat lands and valuable natural forests.**
- (iv) Free, prior, and informed consent formation system has been secured in the cases related to the rights of indigenous and other local peoples over the forest or the related area in which said wood and other related materials are harvested.**
- (v) Safe and hygiene working conditions are secured through health and safety education and training as well as appropriate safety gears provided for workers who engage in harvesting of said wood and other related materials.**

### **<Commentary>**

This Appendix explains a specific procedure for confirming that non-certified paper to be used meets the requirements of Section 2 (2).

This confirmation is implemented by paper makers in Japan in the case of paper manufactured in Japan and importers in the case of paper manufactured and imported from overseas (hereinafter, “confirming entities”).

Confirming entities are required to investigate raw materials of virgin pulp and, in cases where it is made from wood and other related materials (including thinned wood; non-wood such as bamboo and reeds; and paper mulberry and paperbush for Japanese paper), rather than

lumbering chips, etc., confirm the sustainability of the virgin pulp in accordance with (i) to (v) shown in the Appendix. The confirmation methods may include the collection of related documents, interviews with or questionnaires completed by concerned parties, on-site inspections, and other activities that enable the gathering of necessary information. Whichever methods may be adopted, however, the most important point is to implement the verification based on as objective evidence as possible. The results of the verification should be recorded in writing by reference to Sample Format 1.

The confirming entities are then required to submit a document similar to Sample Format 2 that certifies that the virgin pulp used is made from wood and other related materials verified as meeting the requirements of Section 2 (2) or lumbering chips, etc., to their customers or others to whom their products are delivered.

Processors, distributors, and other businesses that handle the paper delivered, together with the document created based on Sample Format 2, from the confirming entities are then requested to properly manage the paper separately from other types of paper and prepare and submit a document based on Sample Format 2 to their customers or others to whom they sell or otherwise supply their products in order to pass on the information on the raw materials of virgin pulp used.

(The information may be provided by noting it on other existing documents, instead of preparing a document based on Sample Formats 1 and 2.)

Sample Format 1 (Document recording confirmation results prepared by paper makers or importers)

We conducted an investigation regarding the sustainability of virgin pulp used for our paper to be delivered, in accordance with the procedure specified in Appendix to the Sustainable Sourcing Code for Paper prepared by the Tokyo Organising Committee of the Olympic and Paralympic Games. The objective of the investigation was to confirm that the virgin pulp is made from wood or other related materials (including thinned wood; non-wood such as bamboo and reeds; and paper mulberry and paperbush for Japanese paper) that meet the conditions (i) to (v) set forth in Section 2 (2) of the Sourcing Code. The results are as follows:

Confirmation items	Results	Evidence
(i) Said wood and other related materials have been harvested through legally necessary procedures of the producing country or region.	<p><b>【Entry example】</b></p> <ul style="list-style-type: none"> <li>• A harvesting permit has been issued.</li> </ul>	<p><b>【Entry example】</b></p> <ul style="list-style-type: none"> <li>• The harvesting permit issued</li> </ul>
(ii) The forest or the related area, in which said wood and other related materials are harvested, has been approved for forest management or other related plans, or the land owner, etc. has a plan or a policy related to management and maintenance of the forest or the related area.	<p><b>【Entry example】</b></p> <ul style="list-style-type: none"> <li>• The forest is managed under a management plan prepared by the forest owner.</li> </ul>	<p><b>【Entry example】</b></p> <ul style="list-style-type: none"> <li>• The management plan</li> </ul>
(iii) Appropriate conservation measures have been taken for harvesting and other activities, in the cases where the forest or the related area is a habitat for any of rare plants and animals; and in the cases where the forest or the related area has any of important forests and areas to be protected, such as peat lands and valuable natural forests.	<p><b>【Entry example】</b></p> <ul style="list-style-type: none"> <li>• No habitats of rare plants or animals have been identified.</li> <li>• Because there is a nest of a rare raptor species, necessary measures are taken.</li> <li>• The primary forest is designated as a protected area and is not included in the logging site.</li> </ul>	<p><b>【Entry example】</b></p> <ul style="list-style-type: none"> <li>• Information on rare plants and animals published by the government and NGOs; the results of on-site inspections</li> <li>• Work instructions and a manual prepared for protecting rare plants and animals</li> <li>• Forest planning map</li> <li>• Interviews with concerned business operators in the</li> </ul>

		producing country
(iv) Free, prior, and informed consent formation system has been secured in the cases related to the rights of indigenous and other local peoples over the forest or the related area in which said wood and other related materials are harvested.	<p><b>【Entry example】</b></p> <ul style="list-style-type: none"> <li>• Explanations about the management and logging of the forest are given to the representatives of indigenous and other local peoples to obtain their understanding.</li> <li>• No indigenous people who have customary rights in the area in which the forest is located are identified.</li> </ul>	<p><b>【Entry example】</b></p> <ul style="list-style-type: none"> <li>• Agreement signed between the logging company and the local communities</li> <li>• Distribution maps of customary rights held by indigenous peoples published by the government and NGOs</li> </ul>
(v) Safe and hygiene working conditions are secured through health and safety education and training as well as appropriate safety gears provided for workers who engage in harvesting of said wood and other related materials.	<p><b>【Entry example】</b></p> <ul style="list-style-type: none"> <li>• Training on safety and hygiene is provided to all the workers.</li> <li>• It is made sure that the workers wear safety gears.</li> </ul>	<p><b>【Entry example】</b></p> <ul style="list-style-type: none"> <li>• Training records</li> <li>• Photographs of the workers at work</li> <li>• Interviews with concerned business operators in the producing country</li> </ul>

Note: Make sure to keep copies of documents checked, detailed records of explanations given by interviewees, and other evidence.

Date:

Confirmation entity: \_\_\_\_\_

Sustainable Sourcing Code for Paper

Sample Format 2 (Document prepared by paper makers, importers, processors, distributors, etc.)

No.:

Date:

To: XXXXXXXX (delivery destination)

Address of the company:

Name of the company: :

Representative:

Only the virgin pulp made from either of following (a) or (b) is used for the product specified below (or for the paper used for the product specified below):

- (a) Wood or other related materials (including thinned wood; non-wood such as bamboo and reeds; and paper mulberry and paperbush for Japanese paper) confirmed in accordance with the procedure specified in Appendix to the Sustainable Sourcing Code for Paper prepared by the Tokyo Organising Committee of the Olympic and Paralympic Games as meeting the conditions (i) to (v) set forth in Section 2 (2) of the Sourcing Code
- (b) Lumbering chips, construction waste, forest scraps, or fiber from waste plants

Product

- 1. Item name (see Note x)):
- 2. Quantity (see Note y)):

Note x): Enter the name of the product.

Note y): Affix a unit used in transactions (e.g., kg, sheets, m<sup>2</sup>, pieces).

Note z): The above information may be provided by noting it on a delivery notes/reports (*nohinsho*) or other existing document, instead of preparing a certificate based on this Sample Format.