

Public Review Comments for the Development of the 2010 – 2014 SFI Standard

24 September 2008

Notes: These are the actual comments submitted during the first public comment period (June 2, 2008 – August 4, 2008) for the development of the 2010-2014 SFI Standard. Only names identifying the commenter, organization or individuals have been deleted (shown as: [NAME OMITTED]). Also we have inserted [No Comment] in columns where the commenter did not provide a comment in either the rationale for change or suggested new language.

SFI STANDARD STRUCTURE AND ORGANIZATION	2
SFI STANDARD PRINCIPLES	3
SFIS OBJECTIVES FOR LAND MANAGEMENT	8
SFIS OBJECTIVES FOR PROCUREMENT	50
SFIS OBJECTIVE FOR FORESTRY RESEARCH, SCIENCE, AND TECHNOLOGY	74
SFIS OBJECTIVE FOR TRAINING AND EDUCATION	78
SFIS OBJECTIVE FOR LEGAL AND REGULATORY COMPLIANCE	79
SFIS OBJECTIVE FOR PUBLIC AND LANDOWNER INVOLVEMENT IN THE PRACTICE OF SUSTAINABLE FORESTRY	82
SFIS OBJECTIVE FOR MANAGEMENT REVIEW AND CONTINUAL IMPROVEMENT	90
DEFINITIONS	108
AUDIT PROCEDURES	129

SFI STANDARD STRUCTURE AND ORGANIZATION

1. Do you feel that the SFI Standard is organized in an appropriate way?	If not, what changes would you make:
Yes	
No	combine the procurement criteria with objectives 1-7
Yes	
Yes	
No	Suggest that the fiber procurement requirements are included as audit criteria for the chain of custody certification program
Yes	
Yes	
Yes	
Yes	
Yes	More or less. Objectove 12 is sort of a catch all, too much overlap between Objectove 4 and 6, SIC-related indicators too scattered
Yes	
Yes	
No	The standard should be "Canadianized" throughout. There are numerous references to states and US agencies that need to be more inclusive of Canadian forms of government and public land management. A major difference between the 2005-09 standard and the 2002-04 standard is that in the 2005-09 there are specific objectives for such things as research, legal & regulatory compliance, public & landowner involvement, management review & continual improvement, training & education, etc. (Objectives 9-13). In the 2002-04 standard, such items were incorporated within each of the other objectives. It is our understanding that it is under consideration for the new SFIS that it would go back to the 2002-04 format. Our comment is that going back would be highly undesirable and that we should stay with the 2005-09 format.
Yes	
Yes	
Yes	
No	labeling guidelines, rather than standard, contain some key substantive issues and definitions. This should be incorporated/integrated into the procurement standard.

No	The nine SFI Principles are difficult to consider during audits because they are not defined by criteria and indicators. SFI Objectives, performance measures and indicators should be organized under the principles. Many of the indicators should be promoted to either an objective or performance measure. Other indicators should be described simply as examples.
Yes	
No	Many of the indicators for 8-13 are repeated due to being achieved by applying activities to one objective. I need objectives and indicators to be organized in a logical order of application to eliminate the use of a matrix. A checklist of things to do would be nice.
No	The SFI Standard should revamped to become applicable as a world organization. Much of the wording and approaches make it appear to the reader to be North American in nature and not applicable to the rest of the world.

SFI STANDARD PRINCIPLES

1. Sustainable Forestry: To practice sustainable forestry to meet the needs of the present without compromising the ability of future generations to meet their own needs by practicing a land stewardship ethic that integrates reforestation and the managing, growing, nurturing, and harvesting of trees for useful products with the conservation of soil, air and water quality, biological diversity, wildlife and aquatic habitat, recreation, and aesthetics.

Rationale for proposed change:	Proposed New Language:
None	None
OK as is	
Carbon should be conserved by reducing the distance the final product (lumber) is trucked out of the area, by using locally produced renewable fuel/energy resources to power employee trucks, offices, lumber mill, and log harvesting and log transportation equipment. Our current forestry practices need to stop or reduce, not increase, global climate change in order to be sustainable and not spoil the forest resource for future generations by making the climate unsuitable to the native flora and fauna.	To practice sustainable forestry to meet the needs of the present without compromising the ability of future generations to meet their own needs by practicing a land stewardship ethic that integrates reforestation and the managing, growing, nurturing, and harvesting of trees for useful locally (250 mile radius) useful products with the conservation of soil, air and water quality, carbon, biological diversity, wildlife and aquatic habitat, recreation, and aesthetics.
The Principle fails to address the loss of forest land, To simply practice SFM on the remaining	To practice sustainable forestry to meet the needs of the present without compromising the ability of future

<p>forest land will not create the values inherent in SFM</p>	<p>generations to meet their own needs by practicing a land stewardship ethic that protects existing forest land uses, integrates afforestation and reforestation and the managing, growing, nurturing, and harvesting of trees for useful products with the conservation of soil, air and water quality, biological diversity, wildlife and aquatic habitat, recreation, and aesthetics.</p>
<p>At least for NE Hardwood Forests, an emphasis on "reforestation" creates a presumption of activity that in fact never occurs. Selection and thinning, not regeneration, is our long term forestry strategy.</p>	<p>OMIT: reforestation and</p>
<p>Afforestation may be a component in improving the practice of sustainable forestry.</p>	<p>To practice sustainable forestry to meet the needs of the present without compromising the ability of future generations to meet their own needs by practicing a land stewardship ethic that integrates reforestation, afforestation, and the managing, growing, nurturing, and harvesting of trees for useful products with the conservation of soil, air and water quality, biological diversity, wildlife and aquatic habitat, recreation, and aesthetics.</p>
<p>[Name Omitted] we believe our operations should be financially and environmentally sustainable. As a result we have launched a number of programs related to the environmental and social performance of the paper used in our publications. To accomplish this we are focusing on reclaiming and recycling magazine paper, understanding and mitigating climate change and promoting sustainable forest management.</p> <p>To encourage improvements to forest management we have promoted forest certification through our Certified Sustainable Forestry Program. We believe that the Program intersects with our interest in climate change. As a result we are recommending that the Sustainable Forestry Initiative Inc. consider including specific and direct reference to climate change in the SFI Standard beginning with the SFI Standard Principles.</p>	<p>To practice sustainable forestry to meet the needs of the present without compromising the ability of future generations to meet their own needs by practicing a land stewardship ethic that integrates reforestation and the managing, growing, nurturing, and harvesting of trees for useful products and ecosystem services with the conservation of soil, air and water quality, biological diversity, wildlife and aquatic habitat, recreation, and aesthetics. As a priority sustainable forestry practices should be designed and implemented to address and mitigate the effects of climate change.</p>
<p>2. Responsible Practices To use and to promote among other forest landowners sustainable forestry practices that are both scientifically credible and economically, environmentally, and socially responsible.</p>	
<p>Rationale for proposed change:</p>	<p>Proposed New Language:</p>
<p>A exemption could be added if forestry practices are considered research potentially benefiting the greater good.</p>	<p>2. Responsible Practices: To use and to promote among other forest landowners sustainable forestry practices that are both scientifically credible and economically, environmentally, and socially responsible, unless deemed research when it's</p>

	purpose is to benefit the greater good.
OK as is	
grammatical correction	change to "to use and promote"
In areas where substantial acres are owned by large numbers of NIPF's, the introduction of "socially responsible" forestry practices creates a divisive and contentious element.	OMIT: and socially responsible.

3. Reforestation and Productive Capacity To provide for regeneration after harvest and maintain the productive capacity of the forestland base.

Rationale for proposed change:	Proposed New Language:
none	
OK as is	
To make it less wordy. To clarify that we are talking about trees (I don't think that we mean to imply that we will regenerate non-timber forest products such as mushrooms or salal after their harvesting).	3. Reforestation and Productive Capacity To reforest after the harvest of trees and maintain the productivity [<i>italics</i>] of the forestland base.
Maintaining does not address conversion of forest land to other uses which would be not as sustainable as forest land uses.	To provide for regeneration after harvest and maintain and expand the productive capacity of the forestland base.
<ul style="list-style-type: none"> Regeneration to traditional plantation forest conditions does not allow all native plant and wildlife populations to recolonize, survive, and reproduce, and therefore be sustainable. Our definition of natural forest conditions (below) provides more specific guidance for maintaining forests' productive capacity. Forestland base has ambiguous meaning. Productive capacity will only be maintained if forest lands are not converted to non-forest uses. 	<p>To provide for regeneration after harvest to natural forest conditions and maintain the productive capacity of all forested landscapes by maintaining them for forest uses only.</p> <p>Define natural forest as "forests that are managed to maintain the majority of their native biodiversity and ecological composition, structure, and function".</p>
Retention of species diversity	To provide regeneration after harvest to maintain the original species integrity and productive capacity of the forestland base.

4. Forest Health and Productivity To protect forests from uncharacteristic and economically or environmentally undesirable wildfire, pests, diseases, and other damaging agents and thus maintain and improve long-term forest health and productivity.

Rationale for proposed change:	Proposed New Language:
OK as is	
invasives should be included in forest health	add "invasive plant and animal species" after "pests, diseases,"
This seems to say that economic factors contribute to the environmental list that follows. In addition this only addresses 2/3's fo the SFM triad missing of course soical issues.	To protect forests from economic, social, or environmental drivers that endanger long-term forest health and productivity such as declines in economic value that contribute to changing land uses, social practices that reduce productivity, and the evnironmental risks of undesirable wildfire, pests,

	diseases, and other damaging agents
The phrase "uncharacteristic" allows substantial value-based judgement concerning the use of a particular tract, with the attendant hassle factor for the landowner. Omitting will keep this section consistent with Performance Measure 2.4.	OMIT: uncharacteristic and
Avoid soil erosion and habitat decimation	To protect forests from uncharacteristic and economically or environmentally undesirable wildfire, pests, diseases, clear cutting practices and other damaging agents or activities and thus maintain and improve long-term forest health and productivity.

5. Long-Term Forest and Soil Productivity To protect and maintain long-term forest and soil productivity.

Rationale for proposed change:	Proposed New Language:
OK as is	
Clarification and strengthen of intent.	To protect and maintain long-term forest and soil productivity through adherence to SFI principals and sustainable forest management practices.

6. Protection of Water Resources To protect water bodies and riparian zones.

Rationale for proposed change:	Proposed New Language:
"Zones" may not be the preferred language	To protect water bodies and riparian areas.
Needs clarification	To protect water quality of all bodies of water that may be impacted by sedimentation from timber harvesting operations.
"Protection" alone is too subjective. Adherence to water quality standards is measurable and sufficient for meeting all designated uses.	To adequately protect all water bodies and riparian zones such that they meet all water quality standards.

7. Protection of Special Sites and Biological Diversity To manage forests and lands of special significance (biologically, geologically, historically or culturally important) in a manner that takes into account their unique qualities and to promote a diversity of wildlife habitats, forest types, and ecological or natural community types.

Rationale for proposed change:	Proposed New Language:
OK as is	
simple clarification	To manage forests and lands of special significance (biologically, geologically, historically or culturally important) in a manner that takes into account their unique qualities and to promote a diversity of wildlife habitats, forest types, and ecological or natural community and cultural types.
• The unique qualities of forests and lands of special significance may be lost if they are merely "taken into account"; they must be explicitly protected.	To manage forests and lands of special significance (biologically, geologically, historically or culturally important) in a manner that protects their unique

<ul style="list-style-type: none"> • “Ecological communities” can be measured directly and provides more concise language. • A diversity of wildlife habitats, forest types, and ecological communities must also be protected, not merely “promoted”. 	qualities and to protect a diversity of wildlife habitats, forest types, and ecological communities.
--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------

8. Legal Compliance To comply with applicable federal, provincial, state, and local forestry and related environmental laws, statutes, and regulations.

Rationale for proposed change:	Proposed New Language:
OK as is	
Seems unnecessary as worded, If you break the law then there will be penalties, We should aim for a higher standard over time	To promote continuous improvement in sustainable forest land management by at least being in compliance with applicable federal, provincial, state, and local laws, statutes, and regulations
<ul style="list-style-type: none"> • There is too much discretion provided to Program Participants in choosing which laws are applicable or not. • Compliance with international treaties and accords, land use and social laws, and numeric or narrative regulatory standards are also important components of sustainability. 	To comply with all international treaties and accords, and federal, provincial, state, and local forestry and related environmental, land use, and social laws, statutes, regulations, and associated standards.
broaden the wording to imply that the standard is more global	add the wording "in the country in which the program participant operates."

9. Continual Improvement To continually improve the practice of forest management and also to monitor, measure and report performance in achieving the commitment to sustainable forestry.

Rationale for proposed change:	Proposed New Language:
OK as is	
Suggest combine with 8. above.	
<ul style="list-style-type: none"> • Improvement needs to be defined relative to sustainability so that the principle is not misconstrued as other types of improvements. • Formal “implementation, effectiveness monitoring, adaptive management, and documentation of all management programs” provides for more accountability than merely “to monitor, measure and report performance”. 	To continually improve the management of sustainable forests through implementation, effectiveness monitoring, adaptive management, and documentation of all management programs and independent verification of compliance with and enforcement of standards.

Use this space to propose any new Principles:

10. Traditional Use To provide for traditional uses that compliment sustainable forestry.
Promote equitable benefit sharing of the values and wealth of sustainable managed forests with local communities, commercial and non-commercial forest landowners. Indigenous Peoples, and the forest workforce.
10. Use of Best Scientific Information Available

<p>To base all programs and management plans on the best scientific information available to ensure that the highest quality (or best) science is given the most weight over other types of science and information in managing for sustainable forests. When applicable scientific information is lacking, the precautionary principle should be applied until such information is available.</p>
<p>X. Efforts to Mitigate the Effects of Climate Change</p>
<p>To manage forests and lands to maintain or increase carbon stocks to provide long term, sustained measures to mitigate the effects of climate change; to mitigate climate-induced changes to ecosystems; to produce renewable sources of energy and create economic benefits associated with carbon sequestration.</p>
<p>Add: Community relationships. Safety and liability considerations. Consultation with the public and affected stakeholders.</p>

SFIS OBJECTIVES FOR LAND MANAGEMENT

Objective 1. To broaden the implementation of sustainable forestry by ensuring long-term harvest levels based on the use of the best scientific information available.

Rationale for proposed change:	Proposed New Language:
None	None
OK	
<p>There has been a dramatic change in forest ownership in the United States. Most publicly owned, vertically integrated, industrial corporations have divested forestlands to maximize profits of shareholders. Financial institutions or timber investment management organizations (TIMO) have acquired a large percentage of these forestlands to be managed for investors for a guaranteed annual rate of return. The investment is typically for a limited period of time (usually 10 years). At the end of the contract period, it is uncertain as to whether the TIMO will continue managing the forestland for new investors or sell the land. Many of these financial institutions will continue to manage the forest ownerships under the SFIS. Under these circumstances, what is "long-term"? How is it defined?</p>	
<p>It is not clear to me what we are talking about: I assume we mean timber, but it is not explicitly stated. Also, do we mean planned (usually short- and long-term) or actual harvest levels (obviously short term only)? My suggested wording tries to clarify this and remove some unnecessary words.</p>	<p>Ensure planned and actual harvest levels meet sustainable forestry [<i>italics</i>] principles and are based on the best scientific information available.</p>
<p>Merely broadening implementation leaves too much</p>	<p>To implement sustainable forestry by ensuring long-</p>

discretion to Program Participants.	term harvest levels are based on the use of the best scientific information available.
The objective can be misinterpreted as currently written to imply that sustainable forestry is solely implemented by maintaining long-term harvest levels. Maintaining long-term harvest levels is addressed in Performance Measure 1.1.	To broaden the implementation of sustainable forestry by using the best scientific information available.
To emphasize climate change as well as long term harvest levels in the objective.	To broaden the implementation of sustainable forestry by ensuring longterm harvest levels and climate change related management strategies based on the use of the best scientific information available.
Leading with a concern about harvest levels implies that "getting the wood out" is the most important value in SFI. Using best scientific information, tempered by humanistic considerations, should apply to all environmental, economic and social topics supported by SFI.	Reorganize under a broader, overarching principle.
verification and clarification of "best" available scientific information.	To broaden the implementation of sustainable forestry by ensuring long-term harvest levels based on the use of the best and proven scientific information available from qualified independent, global and government sources.

Performance Measure 1.1. Program Participants shall ensure that long-term harvest levels are sustainable and consistent with appropriate growth-and-yield models and written plans.

Rationale for proposed change:	Proposed New Language:
Does not include future forest conditions. A plan is mor meaningful if a desired future forest condition is known and or sought.	PP shall ensure that long-term harvest levels are sustainable and consisten with appropriate growth-and-yield models and written plans with clear future forest conditions outlined.
OK	
As presently written, the spatial scale is not defined. A spatial framework, such as within a HUC of an appropriate size such that a 250,000 acre watershed can't be absorbed in a larger landholding, is needed. For example, consider a 250,000 acre watershed, where the total ownership of a company of 80,000 acres has been harvested to the point where little additional harvest can occur for another 30-40 years or longer. But, because this only represents 7% of the company's ownership within the state, it can get hidden within the larger ownership, and still meet the sustainability requirement. "Long-term" needs to be defined in the context of a TIMO type ownership discussed above.	Add "and landowner incentives" to end
Again, I am not completely clear what we are saying here. Long-term harvest levels have not taken place. I am not sure that we can say that they are sustainable when they have not occurred according	Program participants [italics] shall ensure that panned short- and long-term harvest levels meet sustainable forestry [italics] principles and are consistent with appropriate growth-and-yield models [italics] and

to new rules published in Canada by the Competition Bureau and I suspect that this could be similar for new rules expected in the U.S from the Federal Trade Commission.	written plans.
The rationale for using models and plans must be to determine sustainable rates of harvest.	Program Participants shall ensure that long-term harvest levels are sustainable and consistent with appropriate growth-and-yield models and written plans, such that harvest rates do not exceed sustainable levels.
See full discussion at definitions	OMIT: appropriate growth-and-yield models
To incorporate climate change related elements in the long-term analysis.	

Use this space to propose any new Performance Measures for Objective 1:

Project Participants shall have a demonstrated commitment to long-term forest ownership and sustainable management.
Performance Measure 1.2. Program Participants shall ensure that long-term measures to mitigate the effects of climate change are incorporated in management plans and monitoring programs.
Land management planning should be a separate performance measure (or the leading objective). All the elements of a forest management plan should be listed. Forest inventory and a method for calculating an allowable harvest should be under a management plan objective. The SFI standard should also recognize that plans for some categories of land might place other objectives ahead of timber production.

Indicators: A long-term resource analysis to guide forest management planning at a level appropriate to the size and scale of the operation, including a periodic or ongoing forest inventory; a land classification system; soils inventory and maps, where available; access to growth-and-yield modeling capabilities; up-to-date maps or a geographic information system (GIS) ; recommended sustainable harvest levels; and a review of nontimber issues (e.g., pilot projects and economic incentive programs to promote water protection, carbon storage, or biological diversity observation). Documentation of annual harvest trends in relation to the sustainable forest management plan. A forest inventory system and a method to calculate growth. Periodic updates of inventory and recalculation of planned harvests. Documentation of forest practices (e.g., planting, fertilization, and thinning) consistent with assumptions in harvest plans.

Rationale for proposed change:	Proposed New Language:
OK	
#1 reads awkwardly as written	#1 - "Long-term resource analysis capabilities to guide forest management planning at a level appropriate to the size and scale of the operation, which would include:"
#2 should include a minimum period of time for keeping proper documentation	
#4 needs some indication of how periodic	#3 – add "and yield" to end.

(COLUMNS TEMPORARILY MERGED TO ACCOMMODATE LONG, SINGLE-COLUMN RESPONSE)

Rationale for new Performance Measure listed above:

SFI needs to carefully consider the how certification applies to the increasingly common class of investor ownerships (TIMOs and others) with very short ownership times (often as little as 10 years). I question whether properties should be certified if the business model is based on short investment periods and rapid property turnover.

Case in point - **[Name Omitted]**. **[Name Omitted]** began acquiring properties in the **Name Omitted** region as investments for pension funds in the early 1990s. Their ownership peaked at about 600,000 acres in the region by about 2000. However, as these properties were held as short term investments they began selling them, and by the middle part of their decade they no longer owned land in the region. During this period their regional operations were certified by SFI.

[Name Omitted]'s model was to harvest heavily in the early years of ownership to reduce the capital investment and remove low-quality growing stock.

The silvicultural approach was appropriate at the stand level - it was not liquidation or high-grading. However, the heavy harvest levels raised questions across the region as to whether it was sustainable across the ownership. When I raised this question with a prominent regional silviculturalist who was part of the SFI review team, he indicated that the initial harvest levels were not sustainable, but they would be followed by a period of reduced harvest (where value accrued on the residual quality growing stock), and that the overall approach was in sustainable balance over about a 30-year period. However, **[Name Omitted]** divested itself of these properties before ever getting to the period of lower harvest. This rapid divestiture was an integral and predictable part of **[Name Omitted]**'s business model that was (or at least should have) been known to the SFI audit team. Since **[Name Omitted]** never had any intention of owning the land for a long enough period to create a sustainable harvest pattern, their long-term plan was at best a fiction and at worst a sham. In fact, many of the properties were sold to liquidators who proceeded to remove the remaining high-quality growing stock, leaving properties that were grossly understocked and incapable of producing significant harvests for several decades.

This type of ownership is now the dominant form of ownership among large timberlands of **Name Omitted**. This business model and harvesting pattern are likely common among these owners. Some have clearly stated that their ownership horizon is 15 years or less.

SFI needs to take a hard look at whether this type of ownership and management regime truly meets the straight-faced test for what most people would consider sustainable forestry. The only thing that separates it from short-term liquidation is the quality of the silviculture (promotion of higher-value growing stock versus high-grading). I think that a demonstrated pattern of short-term ownership and heavy harvesting should disqualify a Program Participant from certification

(End: COLUMNS TEMPORARILY MERGED TO ACCOMMODATE LONG, SINGLE-COLUMN RESPONSE)

<p>To clarify wording and be more explicit that we are talking about timber and trees.</p> <p>Indicator 2 contains a reference to a sustainable forest management plan but this appears to be the only mention of such a plan in Program documents. See below for further discussion of this.</p> <p>In indicator 5., to broaden the concept of forest practices from simply those which are oriented to enhancing timber product value to those that protect, maintain, and enhance all forest values. To clarify that the term "documentation" here refers to plans (does it?) rather than in annual reporting (which is handled elsewhere).</p> <p>*****This long-term resource analysis is an indicator in support of Objective 1, which is really a</p>	<p>1(f). Recommended timber harvest levels that meet sustainable forestry [italics] principles.</p> <p>3. A forest inventory [italics] system and a method to estimate tree growth.</p> <p>4. Periodic updates of the forest inventory [italics] and projections of planned timber harvests.</p> <p>5. Documentation, in plans, of intended forest practices (for example, reforestation, fertilization, thinning, and allowances for riparian reserves and buffers, and residual trees and tree patches).</p>
--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

<p>timber objective. Yet the resource analysis as specified could support a much broader integrated planning objective that would also require a forest management plan. I describe this below under "General Comments".</p>	
<p>Time frame for "long-term" sustainable harvest should be specified - additional indicators may be needed to clarify this issue.</p> <p>Standard does not address "high grading" overharvesting any one species group.</p>	<p>No specific language proposed, but changes and /or new indicators should be added to address the issues identified under "rationale for proposed changes."</p>
<p>Principal 1 requires that sustainable forest be practiced and requires that it is environmentally and economically sound. A plan, once developed, could have many consequences if not followed. Overcutting harvest levels can be justified for insect, disease, natural disasters, etc., but undercutting seems to be given a pass, and the dire economic consequences to local economies have been ignored. There are also severe environmental consequences to undercutting, such as increases in insect, disease, windthrow, and fire. So rationalization of under or over harvesting should be required</p>	<p>[No Comment]</p>
<p>Indicator 1.1.1g: Suggest removing "(e.g. pilot projects and economic incentive programs to promote water protection, carbon storage, or biological diversity conservation)" from this sub-indicator because they may influence the interpretation of what "non-timber issues" are applicable. The examples "nontimber issues" imply that this sub-indicator is only oriented towards revenue generation options. Nontimber issues SHOULD be a part of the management planning process but non-revenue generating purposes should have equal or greater value. Sensitive species/communities/habitats protection (without linkages to conservation easements), regulatory conformance constraints, opportunities for voluntary environmental enhancement/restoration projects are all examples items to include in a review of "nontimber issues" that are not "pilot projects and economic incentives programs". The way this is written suggests that the landowner must seek out these specific types of ways of addressing "nontimber issues".</p>	<p>Indicator 1.1.1g: Suggest removing "(e.g. pilot projects and economic incentive programs to promote water protection, carbon storage, or biological diversity conservation)" from this sub-indicator.</p>
<ul style="list-style-type: none"> • Forest management analysis and planning should be explicitly sustainable. • Soil inventory and maps should not be limited by availability. • Mere access to growth-and-yield modeling capabilities does not ensure they will be used, only the most recent, best science models are acceptable, and their purpose should be to determine sustainable harvest levels (make the link explicit by combining these two indicators). 	<p>1. A long-term resource analysis and plan to guide sustainable forest management planning at a level appropriate to the size and scale of the operation, including</p> <ol style="list-style-type: none"> a. a periodic or ongoing forest inventory; b. a land classification system; c. soils inventory and maps; d. growth-and-yield modeling using the best scientific information to determine sustainable harvest levels; e. up-to-date maps or a geographic information

<ul style="list-style-type: none"> • Remove requirement for a forest inventory system and a method to calculate growth due to redundancy with 1a and 1d. • If nontimber issues are merely reviewed, there is no guarantee they will be incorporated. • The purpose of planned harvest recalculation should be explicitly stated. • Combine 2 and 4 so both are based on the sustainable forest management plan. • The landscape as a whole cannot be considered sustainable unless negative cumulative effects are minimized. 	<p>system (GIS);</p> <p>f. incorporation of nontimber issues (e.g., pilot projects and economic incentive programs to promote water protection, carbon storage, or biological diversity conservation).</p> <p>2. Documentation of annual harvest trends and forest practices (e.g., planting, fertilization, and thinning) in relation to the sustainable forest management plan.</p> <p>3. Periodic updates of inventory and recalculation of planned harvests, including cumulative effects across the landscape, to ensure levels are sustainable.</p>
<p>[No Comment]</p>	<p>Indicator 1b.: The standard could be enhanced by specifying the requirement to use an ecological land clasasification where it exists.</p>
<p>Same as above: computer modeling is interesting, but is so buggy that it should not, in the present state of the art, be made normative.</p>	<p>OMIT d.</p>
<p>As our understanding of climate change impacts on forests improve, it would be prudent to require some monitoring of actual growth and yield deviations from projections, specifically as suggested by climate change research</p>	<p>3. A forest inventory system, method to calculate growth, a system for determining when growth deviates from projections and making appropriate modifications to the sustainable forest management plan.</p>
<p>The SFI standard needs more specific language around sustained yield provisions.</p>	<p>a.recommended sustainable harvest levels by management unit and forest type; and</p> <p>b.a review of nontimber issues (e.g., pilot projects and economic incentive programs to promote water protection, carbon storage, or biological diversity conservation). Areas that reduce potential harvest are removed from sustainable harvest calculations.</p> <p>2.Evidence that average harvest rates in each planning unit do not exceed growth over rolling periods of no more than 10 years.</p>
<p>To incorporate climate change related elements in the long-term analysis.</p>	<p>Periodic updates of inventory to include climate induced ecosystem change and recalculation of planned harvests and carbon sequestration.</p>
<p>Please use this space to suggest any additional Performance Measures or Indicators for Objective 1.</p>	
<p>6. documentation of Future Forest conditions to know and include in Management plan</p>	
<p>Resource analysis needs to consider non-timber values. Reviewing the issues does not go far enough to ensure full economic value is realized. Add indicator: “a valuation and inventory of the non-timber forest product resources.”</p>	
<p>See comments above</p>	
<p>Change: Added indicator 1.1.2.a: Provide documentation that supports a timber harvest level that exceeds or is below planned harvest levels.</p>	
<p>4. In areas where timber harvest levels have exceeded growth levels in the past, stocks should be restored to ensure long-term sustainable harvest levels.</p>	
<p>Does this objective include harvesting to salvage timber after fires and/or pest infestations?</p>	

I just want to ensure that this aspect of timber management is covered somewhere in the standard.
 1.h.monitoring of climate induced ecosystem change (e.g., migration of forest vegetation).
 Skilled workforce retention, feedback and performance records.

Objective 2. To ensure long-term forest productivity and conservation of forest resources through prompt reforestation, soil conservation, afforestation, and other measures.

Rationale for proposed change:	Proposed New Language:
Performance measures are too broad.. Need to include young vibrant trees are desired to ensure forest productivity (the introduction of exotic pests brings this to the forefront)	[No Comment]
OK	[No Comment]
The first requirement to conserve forest resources is to conserve forests. If a program participate is actively engaged in destroying forests through the selling of forest lands for non forest land uses or is directly engaged in conversion then it seems problematic that they should be labeled as sustainable because they manage their existing forest land well	To ensure long-term forest productivity and conservation of forest resources through actions that maintain forests in existing land uses, prompt reforestation, soil conservation, afforestation, and other measures
To ensure long-term forest productivity, climate change mitigation and conservation of forest resources through prompt reforestation, soil conservation, afforestation, and other measures.	To include climate change mitigation in the objective.
This objective is too broad. The performance measures below it should be promoted as objectives. The indicators need elaboration.	[No Comment]

Performance Measure 2.1. Program Participants shall reforest after final harvest, unless delayed for site-specific environmental or forest health considerations, through artificial regeneration within two years or two planting seasons, or by planned natural regeneration methods within five years.

Rationale for proposed change:	Proposed New Language:
OK	[No Comment]
Final harvest should be defined. See definitions, below.	Performance Measure 2.1. Program Participants shall reforest after final harvest [italics], unless delayed for site-specific environmental or forest health considerations, through artificial regeneration within two years or two planting seasons, or by planned natural regeneration methods within five years.
The SFI standard should avoid prescriptive approach. A specific time period could be good for a specific specy but not for all and not for all type of forest.	Program Particiapants shall reforest ... artificial or natural regeneration within a delay in compliance with all applicable laws and with the best management practices applicable to the managed forest.
• Reforestation should occur as soon as possible after harvest to minimize competition between seedlings and quickly regenerating shrubs and to minimize	Program Participants shall reforest as soon as possible after final harvest, unless delayed for site-specific environmental or forest health

<p>erosion and delivery of sediment to streams. • Only advanced natural regeneration should be permitted in which established stands of leave trees are provided as a seed source, but this method is not preferred because it can result in stands of undesirable tree or shrub species and take much longer than regeneration via replanting.</p>	<p>considerations, preferably through artificial regeneration within two years or two planting seasons, or by planned advanced natural regeneration methods within five years.</p>
<p>Alaska's Forest Practices regulations 11AAC 95.375 states in part "Reforestation must be achieved within five years after harvest in Region I and seven years after harvest in Region II and Region III..."</p>	<p>add at the end of the sentence "or within the time allotted by the relevant State Forest Practices regulations".</p>
<p>In NE Hardwood Forest, five years is far too soon to detect good forest management. The provision of a time frame to guide auditors is understandable, but difficult to set to ground conditions.</p>	<p>OMIT: within 5 years</p>
<p>The concern is that in the northern temperate climates, some lowland conifer types may require more than 5 years to obtain adequate natural regeneration, and a regional standard for natural regeneration may be needed in this case. Additional verbiage makes the latitude in the standard more explicit.</p>	<p>Program Participants shall reforest after final harvest, unless delayed for site-specific environmental or forest health considerations, through artificial regeneration within two years or two planting seasons, or by planned natural regeneration methods within an appropriate number of years for the forest type and the region, generally within 5 years.</p>
<p>The term 'Artificial Regeneration' needs to be replaced with a term for planted and seeded forests that excludes the word 'artificial'. Although this term is technically correct, the tone of the term is derogatory to anyone who is not closely associated with our industry.</p>	<p>Replace 'artificial regeneration' with 'regeneration by planting trees or seeding'</p>
<p>Indicators: Designation of all management units for either natural or artificial regeneration. Clear criteria to judge adequate regeneration and appropriate actions to correct understocked areas and achieve acceptable species composition and stocking rates for both artificial and natural regeneration. Minimized plantings of exotic tree species and research documentation that exotic tree species, planted operationally, pose minimal risk. Protection of desirable or planned advanced natural regeneration during harvest. Artificial reforestation programs that consider potential ecological impacts of a different species or species mix from that which was harvested.</p>	
<p>Rationale for proposed change:</p>	<p>Proposed New Language:</p>
<p>Delete #3 Does exotic species include genetically-improved trees?</p>	<p>(does not include genetically-improved trees of native species) insert into #4</p>
<p>#3 – We recommend no use of exotic species . Afforestation is not included in the indicator section explicitly as how it might be a good practice and many examples exist where afforestation has had negative ecological impacts. For instance, softwood planting within range land has been very controversial in wildlife circles because of the invasive potential of</p>	<p>#3 – change to “Prohibition on plantings of exotic tree species”</p>

<p>woody species and impacts to upland gamebird habitat. Add an indicator that limits the role of afforestation to ensure that impacts on non-forested ecosystems are reduced.</p>	
<p>Indicator 2.1.5 (incorrectly listed as 2.1.6 in this survey): Suggest rewriting this indicator to more precisely and accurately capture the intended purpose of this indicator (conversion of natural stands to pine plantations). This indicator appears to be concerned primarily with the conversion of natural stands to pine plantations yet it is written in a way that misses some conversion (e.g. a natural longleaf pine stand to a longleaf pine plantation) and captures many stands that are not really conversions (e.g. loblolly plantation to a longleaf plantation). It also can be interpreted to encourage maintenance of species mix from the previous rotation no matter how ill-advised, and it can be interpreted to include minor differences in ratios of species mix (e.g 60% hemlock & 40% Douglas-fir to 40% hemlock & 60% Douglas-fir). Finally, it can be interpreted to include all stands where traditionally one species is planted and another regenerates naturally to achieve the final species mix (e.g. redwood/Douglas-fir mix forests). All this creates an unnecessarily large amount of documentation work for stands that do not really fit the intent of the indicator (natural stands to plantations).</p>	<p>Indicator 2.1.5: Suggest rewriting this indicator to more precisely and accurately capture the intended purpose of this indicator (conversion of natural stands to pine plantations).</p>
<ul style="list-style-type: none"> • Purely natural regeneration is not preferred because it can result in stands of undesirable tree or shrub species and take much longer than artificial natural or artificial regeneration. Define advanced natural regeneration as “the maintenance of seedlings established in the previous stand to provide a source of seeds to regenerate seedlings in adjacent harvested areas”. • Relative density is an appropriate criterion for judging adequate regeneration. • The appropriate action for correcting understocked areas is replanting. • Acceptable species composition is too subjective and should explicitly be a diversity of native tree species. • The planting of invasive exotic species should only be allowed if there is no risk of them becoming invasive. • Protection of advanced natural regeneration “stands” is needed. • “Considering” potential ecological impacts leaves too much discretion. 	<ol style="list-style-type: none"> 1. Designation of all management units for either advanced natural or artificial regeneration. 2. Monitor stand relative density to judge adequate regeneration and replant to correct understocked areas and achieve a diversity of native tree species for both artificial and advanced natural regeneration. 3. Minimized plantings of exotic tree species and research documenting that exotic tree species, planted operationally, pose no risk of becoming invasive. 4. Protection of desirable or planned advanced natural regeneration stands during harvest. 5. Artificial reforestation programs that minimize potential negative ecological impacts of a different species or species mix from that which was harvested.
<p>2.1.3 Within the next five years, there may be opportunities for forest landowners to operationally plant exotic tree species, including eucalyptus. If that can be accomplished in a manner that does no harm</p>	<p>2.1.3 Operational plantings of exotic tree species pose minimal risk to adjacent forests of native species.</p>

to native tree species and forested systems, it should be considered as an option.	
The term 'Artificial Regeneration' needs to be replaced with a term for planted and seeded forests that excludes the word 'artificial'. Although this term is technically correct, the tone of the term is derogatory to anyone who is not closely associated with our industry.	6. Artificial restoration programs take into account... Indicator 6 -- Replace 'artificial regeneration' with 'regeneration by planting trees or seeding'
<p>Please use this space to suggest any additional indicators for Performance Measure 2.1</p>	
<p>"Afforestation programs that consider potential ecological impacts of the selection and planting tree species in non-forested landscapes."</p>	
<p>6. Prioritize planting of native over exotic tree species, preferably of the same composition as the harvested unit.</p>	
<p>7.No conversion of one forest type to another occurs (unless it is restoration-focused) within areas that are identified as high conservation value forests.</p>	
<p>Performance Measure 2.2. Program Participants shall minimize chemical use required to achieve management objectives while protecting employees, neighbors, the public, and the forest environment.</p>	
<p>Rationale for proposed change:</p>	<p>Proposed New Language:</p>
<p>OK</p>	<p>[No Comment]</p>
<p>Specify types of "chemicals" being referred to here – pesticides, herbicides, and/or insecticides?</p> <p>Needs to include all habitats, not just forests, as other habitat types can be affected by forest management.</p>	<p>Add "and wildlife and aquatic habitats" to end.</p>
<ul style="list-style-type: none"> • Alternative forest practices should be incorporated that are consistent with the goal of minimizing chemical use and sustainability. • Water bodies need explicit protection from chemical exposure. • Protection from exposure to chemicals must be stated explicitly. 	<p>Program Participants shall incorporate forest practices into management objectives that reduce the need for chemical applications while maintaining productivity, such as selection forestry, longer timber rotations, precommercial thinning, and thin and release treatments. Program Participants shall minimize chemical use required to achieve management objectives while protecting employees, neighbors, the public, water bodies, and the forest environment from exposure to such chemicals.</p>
<p>Indicators: Minimized chemical use required to achieve management objectives. Use of least-toxic and narrowest-spectrum pesticides necessary to achieve management objectives. Use of pesticides registered for the intended use and applied in accordance with label requirements. Use of integrated pest management where feasible. Supervision of forest chemical applications by state-trained or certified applicators. Use of best management practices (BMPs) appropriate to the situation; for example, notification of adjoining landowners or nearby residents concerning applications and chemicals used; appropriate multilingual signs or oral warnings; control of public road access during</p>	

<p>and immediately after applications; designation of streamside and other needed buffer strips; use of positive shutoff and minimal-drift spray valves; aerial application of forest chemicals parallel to buffer zones to minimize drift; monitoring of water quality or safeguards to ensure proper equipment use and protection of streams, lakes, and other water bodies; appropriate storage of chemicals; filing of required state reports; or use of methods to ensure protection of threatened and endangered species.</p>	
Rationale for proposed change:	Proposed New Language:
OK	[No Comment]
#2 - What about herbicides? Does this include insecticides? Also, there needs to be some evidence provided that the chemical in use is the least-toxic chemical on the market.	[No Comment]
Chemicals which are non-renewable are not sustainable and should not be used by SFI certified forestry companies. Shipping products long distances (over 250 miles) is currently not sustainable, since it relies on the consumption of non-renewable fossil fuels.	7. Use of locally produced renewable chemicals.
[No Comment]	2.2.5- change 'state' to 'appropriately' 2.2.6f- reword '...parallel to...drift' to 'conducted in a maner which minimizes drift' 2.2.6j- remove reference to 'state'
Rationale: Following label requirements and use of BMPs cover appropriate use of pesticides.	[No Comment]
<ul style="list-style-type: none"> • Emphasis on prevention and biological control methods will help to minimize the need for chemical use. • Residential and agricultural areas also need to be buffered from chemical exposure. • Wetlands also need protection as water bodies. • Buffer strip limitations should be described. • Protection of water bodies must be adequate. • Drift of chemicals should be prevented by expanding buffer sizes. • More than the “appropriate storage of chemicals” is required to avoid hazardous material spills and contamination. 	<ol style="list-style-type: none"> 1. Minimized chemical use required to achieve management objectives. 2. Use of least-toxic and narrowest-spectrum pesticides necessary to achieve management objectives. 3. Use of pesticides registered for the intended use and applied in accordance with label requirements. 4. Use of integrated pest management where feasible with an emphasis on prevention and biological control methods. 5. Supervision of forest chemical applications by state-trained or certified applicators. 6. Use of best management practices (BMPs) appropriate to the situation, for example, <ol style="list-style-type: none"> a. notification of adjoining landowners or nearby residents concerning applications and chemicals used; b. appropriate multilingual signs or oral warnings; c. control of public road access during and immediately after applications; d. designation of streamside, wetland, residential, agricultural, and other needed buffer strips where chemicals are not mixed, loaded, or applied; e. use of positive shutoff and minimal-drift spray valves; f. aerial application of forest chemicals parallel to buffer zones to prevent drift, with buffers expanded as needed; g. monitoring of water quality or safeguards to

	<p>ensure proper equipment use and</p> <p>h. adequate protection of streams, lakes, wetlands, and other water bodies.</p> <p>7. Environmentally responsible storage and disposal of chemicals and any waste materials.</p> <p>8. Filing of required state reports.</p> <p>9. Use of methods to ensure protection of threatened and endangered species.</p>
<p>Indicator 6.f.: The Standard should avoid suggesting technical operational procedures since new technology is always evolving.</p>	<p>"aerial application of forest chemicals to minimize drift;"</p>
<p>Specifying "narrow spectrum" herbicides precludes use of the least toxic and most widely available, e.g. glyphosates. This introduces a favorite hobby horse of certain activists, and as such is inappropriate for general forestry standards.</p>	<p>OMIT: #2</p>
<p>The intent of Indicator 1 is contained within the PM. By having a specific indicator to minimize use, undue attention is brought to bear on absolute reduction without proper consideration of economic feasibility.</p>	<p>Delete Indicator 1</p>
<p>Pesticides have a clear and legal definition. The current indicators refer primarily to pesticides. EPA Definition - A pesticide is any substance or mixture of substances intended for preventing, destroying, repelling, or mitigating any pest. Pests can be insects, mice and other animals, unwanted plants (weeds), fungi, or microorganisms like bacteria and viruses. Though often misunderstood to refer only to insecticides, the term pesticide also applies to herbicides, fungicides, and various other substances used to control pests. Under United States law, a pesticide is also any substance or mixture of substances intended for use as a plant regulator, defoliant, or desiccant.</p> <p>The term chemical seems to have negative connotation. Forestry chemical applications include water and various organic and inorganic fertilizers, including sludge, biosolids and soil property modifiers. However, indicators should be specific to type of chemicals that you refer to, such as, irrigation and fertilization.</p>	<p>Indicators:</p> <p>Pesticides:</p> <ol style="list-style-type: none"> 1.Minimized pesticide use required to achieve management objectives. 2.Use of least-toxic and narrowest-spectrum pesticides necessary to achieve management objectives. 3.Use of pesticides registered for the intended use and applied in accordance with label requirements. 4.Use of integrated pest management where feasible. 5.Supervision of forest pesticide applications by state-trained or certified applicators. 6.Use of best management practices (BMPs) appropriate to the situation; for example, <ol style="list-style-type: none"> a.notification of adjoining landowners or nearby residents concerning applications and pesticides used; b.appropriate multilingual signs or oral warnings; c.control of public road access during and immediately after applications; d.designation of streamside and other needed buffer strips; e.use of positive shutoff and minimal-drift spray valves; f.aerial application of forest pesticides parallel to buffer zones to minimize drift; g.monitoring of water quality or safeguards to ensure proper equipment use and protection of streams, lakes, and other water bodies; i.appropriate storage of pesticides; j.filing of required state reports; or

	k.use of methods to ensure protection of threatened and endangered species.
Add to 2.2.6.d to recognize expansion of buffers beyond those recommended by BMPs	Indicator 6 -- Add the following sentence to d: Enhancement of SMZ length and width beyond state BMP standards to buffer and protect SMZ from chemical applications.
<p>Please use this space to propose any additional indicators for Performance Measure 2.2</p>	
<p>Needs to be a #7 where they are asked to justify the use of the chemicals they are using. In other words, are they the least persistent chemical on the market, or are there alternative that they have explored to justify what they do use.</p>	
<p>Change: Deleted indicator 2.2.1 which states “minimized chemical use required to achieve management objectives.”</p>	
<p>10. Non-chemical environmentally friendly pest management should be prioritized over chemical-based pest management. 11. Natural background levels of pest species should be allowed to persist to support functional nutrient cycling (do not sterilize forests). 12. The use of exotic biological control agents is only allowed for controlling exotic pest species when other methods are ineffective and scientific evidence shows they are noninvasive and not harmful to native species. 13. The proper equipment and training for safe chemical use shall be provided to employees responsible for chemical applications. 14. Program participants shall not use a. World Health Organization Type 1A and 1B and chlorinated hydrocarbon pesticides b. Pesticides that are persistent, toxic or whose derivatives remain biologically active or bioaccumulate c. Any pesticides banned by international agreement</p>	
<p>7.Written policy and procedures for the application of forestry pesticides.</p> <p>Irrigation:</p> <p>1.Minimize water use to levels required to achieve management objectives. 2.Monitor water level in streams and/or wells to insure water useage does not infringe on others adversely. 3.Method of irrigation should conform to best management practices (BMPs) appropriate to the situation.</p> <p>Fertilization:</p> <p>1.Minimize fertilizer use to levels required to achieve management objectives. 2.Method of fertilization should conform to best management practices (BMPs) appropriate to the situation. a.aerial application of forest fertilizers parallel to buffer zones to minimize drift; b.monitoring of water quality or safeguards to ensure proper equipment use and protection of streams, lakes, and other water bodies; c.appropriate storage of fertilizers; d.filing of required state reports; or e.use of methods to ensure protection of threatened and endangered species.</p> <p>3.Selection of fertilizer and rates of application are based on research data appropriate for the species, soils, climate and hydrology of the site to achieve management objectives</p>	

Performance Measure 2.3. Program Participants shall implement management practices to protect and maintain forest and soil productivity.

Rationale for proposed change:	Proposed New Language:
OK	[No Comment]
[No Comment]	Add "forest" between "implement" and "management."

Indicators: Use of soils maps where available. Process to identify soils vulnerable to compaction and use of appropriate methods to avoid excessive soil disturbance. Use of erosion control measures to minimize the loss of soil and site productivity. Post-harvest conditions conducive to maintaining site productivity (e.g., limited rutting, retained down woody debris, minimized skid trails). Retention of vigorous trees during partial harvesting, consistent with silvicultural norms for the area.v Criteria that address harvesting and site preparation to protect soil productivity. Minimized road construction to meet management objectives efficiently.

Rationale for proposed change:	Proposed New Language:
OK, but retained woody debris in #4 may become problematic when more biomass used for energy.	[No Comment]
[No Comment]	<p>#2 – define "methods"</p> <p>#3 – Change "loss of soil" to "soil loss" to improve readability.</p> <p>#5 – what type of "partial harvesting" does this refer to? Are we talking about a thinning, a partial clearcut, or a shelterwood, or all of these?</p>

Indicator 2.3.7: Suggest deleting this indicator. This indicator suggests that landowners would normally not minimize road building in operations. Since road building/maintenance is the most expensive part of preparation for forest management operations, it is silly to assume that landowners would not try to minimize road building. This indicator assumes that 1) landowners are not fiscally responsible, and 2) that there is precedence that there are currently more roads being built than is necessary on the managed forest landscape. These assumptions show a lack of understanding of the basic business of management of industrial forests. Further, this indicator is not auditable.	Delete indicator 2.3.7
--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------

Use of soil maps should not be limited by availability. They should be acquired or created.	<ol style="list-style-type: none"> 1. Use of soils maps, creating them where necessary. 2. Process to identify soils vulnerable to compaction and use of appropriate methods to avoid excessive soil disturbance. 3. Use of erosion control measures to minimize the loss of soil and site productivity. 4. Post-harvest conditions conducive to maintaining site productivity (e.g., limited rutting, retained down woody debris, minimized skid trails). 5. Retention of vigorous trees during partial harvesting, consistent with silvicultural norms for the area.
---------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

- 6. Criteria that address harvesting and site preparation to protect soil productivity.
- 7. Minimized road construction to meet management objectives efficiently.

Please use this space to propose any additional indicators for Performance Measure 2.3

Performance Measure 2.4. Program Participants shall manage so as to protect forests from damaging agents, such as environmentally or economically undesirable wildfire, pests, and diseases, to maintain and improve long-term forest health, productivity and economic viability.

Rationale for proposed change:	Proposed New Language:
OK	[No Comment]
Needs to include invasives	Add “and invasive plant and animal species” after “diseases.”
Climate change is a huge threat to sustainable forestry. If it is indeed the goal of SFI to preserve working forests, we must stop any kind of activity which is contributing to the increasing temperatures of the planet and the accompanying shift in species distribution on the landscape over the long term. For the short term, climate change could simply change weather patterns and cause a decrease in yields and/or increased mortality/susceptibility to disease.	They should also be actively protecting their landbase from climate change.
To remove unnecessary words.	Performance Measure 2.4. Program Participants shall protect forests from damaging agents, such as environmentally or economically undesirable wildfire, pests, and diseases, to maintain and improve long-term forest health [italics], productivity [italics] and economic viability [italics].
in Ontario the government has the primary responsibility for the overall management of crown lands, including the management of peats, diseases, wildfire and aboriginal tenure	reword 'manage so as to protect forests' to 'ensure forest lands are managed in a manner that helps to protect them'

Indicators: Program to protect forests from damaging agents. Management to promote healthy and productive forest conditions to minimize susceptibility to damaging agents. Participation in, and support of, fire and pest prevention and control programs.

Rationale for proposed change:	Proposed New Language:
OK	[No Comment]
<p>Rationale: Having a process to monitor and react was favored over a protection program.</p> <p>Change: replaced protect with monitor in indicator 2.4.1. Included indicator 2.4.1.a; proposed change below.</p>	1. Program to monitor forests from damaging agents.

<ul style="list-style-type: none"> • Overprotection from damaging agents may have unintended consequences on beneficial “pest” species. • Examples of fire management help illustrate the intent here. • Because forests have adapted to local natural disturbance regimes, any changes to such regimes will reduce the resilience and thus sustainability of managed forests. 	<ol style="list-style-type: none"> 1. Program to protect forests from damaging agents, but not to the point of creating unnaturally sterile forests. 2. Management to promote healthy and productive forest conditions to minimize susceptibility to damaging agents including combinations of fire prevention (fuel breaks or reduction), fire suppression, prescribed fire, and prescribed natural fire (allowing natural fires to burn with monitoring) tailored appropriately to local conditions. 3. Participation in, and support of, fire and pest prevention and control programs that simulate natural disturbance regimes to the extent possible.
-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Please use this space to propose any additional indicators for Performance Measure 2.4

<ol style="list-style-type: none"> 1. Program to monitor forests from damaging agents. <ol style="list-style-type: none"> a. Include a process to salvage damaged timber in a timely fashion to capture volume loss prior to mortality and avoid spread/risk to adjacent lands.

Performance Measure 2.5. Program Participants that utilize improved planting stock, including trees derived through biotechnology, shall use sound scientific methods and follow all applicable laws and international protocols.

Rationale for proposed change:	Proposed New Language:
OK	[No Comment]
Tree improvement is a great way to extend the survival of species in a geographic region. We can breed and/or select for the trees which will survive best in the coming climate. Yields and survival of trees should definitely increase with the conscious use of tree improvement programs to select appropriate genetic stock for a changing climate.	Breeding work, tree improvement activities, tree selection, and testing should all take into account global climate change.
Need to clarify the use of the word biotechnology and GMO's	[No Comment]
Researchers are on the brink of breakthroughs in the use of genetic modification to improve characteristics of native trees. One example is the American chestnut, where genetic modification may enable a comeback of this magnificent species across its historic landscape. Other breakthroughs may enable the use of less fertilizer or herbicide, or promote greater volume growth per acre. The SFI Standard needs to clearly acknowledge where proper testing, protocols, and approvals are in place, the use of genetically modified planting stock is allowed.	Program participants that utilize improved planting stock, including trees derived through biotechnology or genetic modification, shall use sound scientific methods and follow all applicable laws and international protocols.

Indicator: Program for appropriate research, testing, evaluation, and deployment of improved planting stock, including trees derived through biotechnology.

Rationale for proposed change:	Proposed New Language:
---------------------------------------	-------------------------------

OK	[No Comment]
----	--------------

<p>Indicator 2.5.1: Suggest revising this indicator to exclude landowners that do not produce their own planting stock. Landowners that purchase all their seedlings from a third party should not have to address this indicator. It is unreasonable to expect landowners to have a "program" (as defined in the SFIS) to address this issue if they purchase all their trees from a third party. Also, most seedling producers do not share the details of their "research, testing, evaluation, and deployment" protocols since many aspects of this are proprietary and confidential.</p>	<p>Indicator 2.5.1: Suggest adding "For participants that produce planting stock, ..." in advance of the rest of the wording of this indicator.</p>
-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------

<p>Genetically modified organisms should be prohibited because:</p> <ul style="list-style-type: none"> • They may hybridize with native tree species, disrupt gene complexes, and lead to a loss of native species' genetic diversity. • They may displace native species through competition or become invasive. • They may have unforeseen negative impacts on wildlife, insect, and soil biota species and ecological food webs. • Clear evidence from field testing and risk assessment demonstrating these negative impacts do not occur is currently lacking. 	<p>1. Program for appropriate research, testing, evaluation, and deployment of improved planting stock, including traditional hybrids, cultivars, and other variants that are from artificial insemination and pollination. Planting of genetically modified organisms (those resulting from genetic engineering) is prohibited.</p>
---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

<p>Researchers are on the brink of breakthroughs in the use of genetic modification to improve characteristics of native trees. One example is the American chestnut, where genetic modification may enable a comeback of this magnificent species across its historic landscape. Other breakthroughs may enable the use of less fertilizer or herbicide, or promote greater volume growth per acre. The SFI Standard needs to clearly acknowledge where proper testing, protocols, and approvals are in place, the use of genetically modified planting stock is allowed.</p>	<p>Program for appropriate research, testing, evaluation and deployment of improved planting stock, including trees derived through biotechnology or genetic modification.</p>
--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Please use this space to propose any additional indicators for Performance Measure 2.5

Please use this space to propose any additional Performance Measures and Associated Indicators for Objective 2

Performance Measure 2.6. Program Participants shall ensure long-term forest productivity and conservation of forest resources by incorporating sustainable practices into even-aged harvesting methods.

Indicators:

1. Limitation of clearcuts and other even-aged forest practices to forest types that would naturally be even-aged.
2. Retention of significant areas of standing live trees within clearcuts, which may include areas set aside to protect water bodies, critically imperiled, imperiled, threatened, and endangered species, or steep slopes.

Proposed Performance Measure for Objective 2: Program Participants shall incorporate consideration of ecosystem change in choice of species used in reforestation.

Indicators:

1. Where available, inclusion of information garnered from regional climate models in strategic plans.
2. Implementation of plans that anticipate climate change related ecosystem change.

Rationale for proposed changes: Climate change is altering forest ecosystems including the spatial migration of forest vegetation, increased incidence of wildfire and intensification of disease and pest outbreaks. Because reforestation anticipates rotation ages of 40-150 years it is anticipated that, because of climate change, species suited to a site today may be inappropriate further in the planning cycle.

Objective 3. To protect water quality in streams, lakes, and other water bodies.

Rationale for proposed change:	Proposed New Language:
OK	[No Comment]
[No Comment]	add "rivers" before "streams"
<ul style="list-style-type: none"> • Inadequate protection is not sustainable. • Rivers and wetlands also need explicit protection. 	To adequately protect water quality in rivers, streams, lakes, wetlands, and other water bodies.
Critics of SFI will find a level of confidence in the fact that participants have actually committed to follow best management practices to preserve water quality whether or not BMPs are legally enforceable.	est Management Practices will be available or posted at a web location for review by interested parties.

Performance Measure 3.1. Program Participants shall meet or exceed all applicable federal, provincial, state, and local water quality laws and meet or exceed best management practices developed under U.S. Environmental Protection Agency–approved state water quality programs or other federal, provincial, state, or local programs.

Rationale for proposed change:	Proposed New Language:
OK	
Without planning for a change in climate, habitat for wildlife can not be properly managed.	Should take into account the effects of increasing water temperatures on aquatic habitat due to global climate change when making management decisions.
[No Comment]	replace 'US Environmental Protection Agency' with 'government'
The Performance Measure does not accurately reflect Canadian law.	Performance Measure 3.1. Program Participants shall meet or exceed all applicable federal, provincial, state, and local water quality laws and meet or exceed best management practices developed under U.S. Environmental Protection Agency–approved state water quality programs, Canadian Forest and Riparian

	Management Practices that meet or exceed all applicable Provincial and Federal water quality Acts and Regulations, or other federal, provincial, state, or local programs.
Water quality standards are the true measurable parameters that must be met to attain all designated uses of water bodies under the Clean Water Act.	Program Participants shall meet or exceed all applicable federal, provincial, state, and local water quality laws and standards and meet or exceed best management practices developed under U.S. Environmental Protection Agency–approved state water quality programs or other federal, provincial, state, or local programs.
What assurance is there that state-level BMPs are adequate? The variability of state water quality BMPs is high, and many lack measureable performance indicators. Rather than relinquishing authority to define adequate BMPs to 50 states, SFI should define sideboards acceptable to it.	[No Comment]
being specific to the US EPA means that their standard is applicable anywhere in the world. If this is so than it should be stated as such, it may claify it to add the wording below	add to the final sentence "in the country in which the program participants operates"

Indicators: Program to implement state or provincial BMPs during all phases of management activities. Contract provisions that specify BMP compliance. Plans that address wet-weather events (e.g., inventory systems, wet-weather tracts, definitions of acceptable operating conditions). Monitoring of overall BMP implementation.

Rationale for proposed change:	Proposed New Language:
BMP's should be limited in scope to water quality	New language to state that BMP's = only water quality.
OK	[No Comment]
The Performance Measure does not accurately efelect Canadian law.	[No Comment]

Please use this space to propose any additional indicators for Performance Measure 3.1

- 5. Participate in the development, application, and improvement of state and provincial (Federal law) BMP establishment and monitoring systems through partnerships with agencies and others.
- 5. Verification of compliance with BMPs.
- 6. Active participation in multi-stakeholder group efforts to create and implement Total Maximum Daily Loads (TMDLs) for impaired water bodies.

Performance Measure 3.2. Program Participants shall have or develop, implement, and document riparian protection measures based on soil type, terrain, vegetation, and other applicable factors.

Rationale for proposed change:	Proposed New Language:
---------------------------------------	-------------------------------

OK	[No Comment]
<p>The term “riparian” as used in SFIS is restricted to water quality protection while the ecological functions of riparian zones, depending on stream order (etc.), make it one of the most diverse and species rich wildlife habitats . The text, Riparian management in forests of the continental Eastern United States edited by E. S. Verry, J. W. Hornbeck, and C. A. Dolloff, define riparian areas follows:“Riparian areas are three-dimensional ecotones of interaction that include terrestrial and aquatic ecosystems, that extend down into the groundwater, up above the canopy, outward across the floodplain, up the near-slopes that drain to the water, laterally into the terrestrial ecosystem, and along the water course at a variable width.”</p> <p>“Riparian protection measures” should be broadened beyond a focus on water quality to include wildlife habitat and the definition of riparian amended.</p>	<p>Add “ecological function” after vegetation</p>

Indicators: Program addressing management and protection of streams, lakes, and other water bodies and riparian zones. Mapping of streams, lakes, and other water bodies as specified in state or provincial BMPs and, where appropriate, identification on the ground. Implementation of plans to manage or protect streams, lakes, and other water bodies. Identification and protection of nonforested wetlands, including bogs, fens, vernal pools, and marshes of significant size. Where regulations or BMPs do not currently exist to protect riparian areas, use of experts to identify appropriate protection measures.

Rationale for proposed change:	Proposed New Language:
OK	[No Comment]
[No Comment]	<p>Add “rivers” before “streams” in #1, 2, and 3</p> <p>Change #4 to “Program for identifying and protecting nonforested...”</p>
<p>3.2.2- add 'manuals and/or guidelines'</p> <p>3.2.4- replace 'identification and protection of' with 'program to identify and protect'</p>	[No Comment]
<ul style="list-style-type: none"> • Management and protection requires more than “addressing”. • Rivers and wetlands also need explicit protection. • Both perennial and intermittent water bodies need protection to meet water quality standards. • Field identification of water bodies is essential to protecting them because they cannot all be detected via remote sensing. • Numerous studies show that no-cut buffers around water bodies are necessary for adequately protecting water quality. Floodplain functions will only be conserved if channel migration zones are protected. • Forested wetlands also need protection to maintain 	<ol style="list-style-type: none"> 1. Inventory, mapping, and accurate classification of all water bodies as specified in state or provincial BMPs, including ground identification of water bodies that can easily be missed by remote sensing (e.g. small streams, wetlands). 2. Identification and protection of forested and nonforested wetlands, including bogs, fens, vernal pools, and marshes. 3. Program to manage and protect rivers, streams, lakes, wetlands, and other water bodies and riparian zones, whether they are perennial or intermittent. 4. Implementation of plans to manage or protect all water bodies, which includes maintaining no-harvest

<p>specially-adapted wildlife, fish, and plant species.</p> <ul style="list-style-type: none"> • Use “qualified resource professionals” instead of “experts” because they are already defined. • Filling gaps in BMPs should not be restricted to riparian areas alone. 	<p>buffers around all water bodies and channel migration zones.</p> <p>5. Where regulations or BMPs do not currently exist to protect water bodies, use of qualified resource professionals to identify appropriate protection measures.</p>
<p>Unless vernal pools are much more carefully defined than has been customary, this provision has the potential to exclude from forest management very large tracts of private Northern Hardwood Forest, and also of Balsam Fir groves.</p>	<p>OMIT: vernal pools</p>
<p>Size should not be the determinant of the importance of wetlands -- ecological importance should. Also, need to include ecologically significant forested wetlands.</p>	<p>4. Identification and protection of ecologically important wetlands, including non-forested wetlands (e.g., marshes, bogs, fens, vernal pools, etc.) and forested wetlands.</p>
<p>Please use this space to propose any additional indicators for Performance Measure 3.1</p>	
<p>6. Restoration of buffers around water bodies where they are degraded or insufficient for protecting water quality.</p> <p>7. Design road networks that minimize stream crossings, run perpendicular to streams, and include culverts of sufficient size for fish passage.</p>	
<p>Please use this space to propose any additional Performance Measures and Associated Indicators for Objective 3</p>	
<p><i>Objective 4. To manage the quality and distribution of wildlife habitats and contribute to the conservation of biological diversity</i> by developing and implementing stand- and landscape-level measures that promote habitat diversity and the conservation of forest plants and animals, including aquatic fauna.</p>	
<p>Rationale for proposed change:</p>	<p>Proposed New Language:</p>
<p>OK</p> <p>While the current wording helps protect any remaining critical habitat or communities, and there is discussion of addressing old growth issues within regions, there are no requirements for companies to contribute to even a minimum level of restoration of critical habitat or communities. Once a company has lands in an intensive management system, they can keep those lands in this condition even if species or communities are continuing to decline in the landscape because of lack of habitat or communities that have dropped below critical levels. Additional language is needed that holds a company responsible for contributing within a defined landscape to provide for a minimum level of</p>	<p>[No Comment]</p> <p>Add “and flora” to end</p>

<p>representation of all native ecosystems within that landscape that fall below the minimum level of representation. The contribution could be based on the percentage of forest ownership of the company within a HUC, perhaps of the same size as discussed above. How to define the native ecosystem diversity and minimal levels of representation will probably meet substantial resistance, as will this whole notion of requiring restoration on private lands in landscapes where past practices have eliminated or reduced to very low levels certain native ecosystems. However, by making the level of representation at the landscape scale, companies can contribute either through restoration on their own lands, or through restoration on other public or private lands. They could meet restoration requirements through partnerships with public land agencies, or by providing for off-site restoration on other private lands if they didn't want to produce the needed conditions on their own lands. An off-site measurement system to assure appropriate restoration is accomplished could be put into place, based on The Wildlife Society's performance measures technical report.</p> <p>Stands are not really ecological units in the sense used in this section of the document. We often treat them as such but since age is a determinant in the definition of a stand - they are hard to model as ecological units. Ecological Land Classification recognizes ecosites and ecoelements as the lowest level in the spatial classification hierarchy.</p>	
<p>Almost any action can be justified as "promoting" biodiversity.</p>	<p>Replace "promote" with "maintain, enhance, and restore native biological diversity." Alternatively, the more specific term biological integrity might be appropriate.</p>
<p>Need to conserve forest land in order to conserve forest habitat.</p>	<p>Objective 4. To manage the quality and distribution of wildlife habitats and contribute to the conservation of biological diversity by developing and implementing stand- and landscape-level measures that promote habitat diversity and the conservation of forests, plants, and animals, including aquatic fauna.</p>
<p>[Name Omitted] is concerned with language which references specific organizations (AZE, CI, etc) and requests that the SFI, Inc. consider the use of generic language in the standard, with reference to specific organization and areas targeted for protection in the guidance document.</p>	<p>[No Comment]</p>
<p>[No Comment]</p>	<p>As is.</p>
<p>Requiring stand-level measures for biodiversity will likely lead to regulatory-creep that will increase costs and provide little or nothing for wildlife.</p>	<p>Drop the stand-level language.</p>

<p>The wording of Objective 4 should be modified so that the different level of control that program participants (PPs) have on stand-level property vs. landscape-level property is clearly recognized and taken into account. Where PPs own or control their own stands, developing and implementing a program is achievable. This is not necessarily the case for a landscape-level program. On one hand, one can imagine examples of programs sponsored by state organizations, provincial license areas or region conservation groups for which it may be appropriate for a PP to participate in on a voluntary basis. However, to require a PP to design a specific program that incorporates property that is not controlled by the PP (i.e., the rest of the landscape) is problematic.</p>	<p>[No Comment]</p>
<p>Climate change effects include alteration of existing wildlife habitats. As a result managers need to anticipate these changes by incorporating climate related impacts in planning for biodiversity conservation.</p>	<p>To manage the quality and distribution of wildlife habitats and contribute to the conservation of biological diversity by developing and implementing stand- and landscape-level measures—taking into consideration climate change related effects—that promote habitat diversity and the conservation of forest plants and animals, including aquatic fauna.</p>
<p>Objective 4 is commendable, but it lacks a sufficient number of separate performance measures to carry it out. There should be performance measures for biological assessments, environmental impacts, and mitigation measures. Control of invasive species should be an objective, or at least a performance measure.</p>	<p>[No Comment]</p>
<p>Avoid references to specific organizations (AZE, CI, etc.) Consider use of generic language with reference to specific organizations in the guidance document.</p>	<p>No proposed changes</p>
<p>Performance Measure 4.1. Program Participants shall have programs to promote biological diversity at stand and landscape levels.</p>	
<p>Rationale for proposed change:</p>	<p>Proposed New Language:</p>
<p>OK, difficult to do in plantations, though</p>	
<p>SFI's biodiversity standard is too vague and thus does not ensure that diversity will be maintained or restored where degraded. Assessments are not enough. SFI must include specific biodiversity indicators that effectively address management actions across the different scales and elements of biodiversity. To address these weaknesses, Performance Measure 4.1 and associated indicators should be replaced with clear and effective indicators that address the full range of biodiversity. With these changes Performance measure 4.2 could be</p>	<p>Program participants develop and implement programs that have an overall goal maintaining, enhancing, or where necessary restoring, habitat conditions suitable to sustain healthy populations of the full range of native flora and fauna of the forest and associated communities.</p>

eliminated, or modified to incorporate applicable new indicators proposed under 4.1.	
4.1.3 Continue to focus protection needs on G1/G2 species and communities. Avoid consideration of S1/S2 species and communities.	As is.
Same as above	Drop the stand-level language
The wording of PM 4.1, including indicators, should be modified so that the different level of control that program participants (PPs) have on stand-level property vs. landscape-level property is clearly recognized and taken into account. Where PPs own or control their own stands, developing and implementing a program is achievable. This is not necessarily the case for a landscape-level program. On one hand, one can imagine examples of programs sponsored by state organizations, provincial license areas or region conservation groups for which it may be appropriate for a PP to participate in on a voluntary basis. However, to require a PP to design a specific program that incorporates property that is not controlled by the PP (i.e., the rest of the landscape) is problematic.	[No Comment]
4.1.3. Support keeping the protection focused on species and communities for G1/G2. Please do not stray into any S1/S2 protections--which would be fraught with legal problems and excessive costs to landowners and operators.	[No Comment]
•4.1.3 – Continue to focus protection needs on G1/G2 species and communities. Avoid consideration of S1/S2 species and communities. Species and community survey data is often incomplete or weak within a state and generates several S1/S2 calls with validity questioned even by the state agencies.	•4.1.3 – Continue to focus protection needs on G1/G2 species and communities. Avoid consideration of S1/S2 species and communities. Species and community survey data is often incomplete or weak within a state and generates several S1/S2 calls with validity questioned even by the state agencies.

Indicators: Program to promote the conservation of native biological diversity, including species, wildlife habitats, and ecological or natural community types, at stand and landscape levels. Program to protect threatened and endangered species. Plans to locate and protect known sites associated with viable occurrences of critically imperiled and imperiled species and communities. Plans for protection may be developed independently or collaboratively and may include Program Participant management, cooperation with other stakeholders, or use of easements, conservation land sales, exchanges, or other conservation strategies. Development and implementation of criteria, as guided by regionally appropriate science, for retention of stand-level wildlife habitat elements (e.g., snags, mast trees, down woody debris, den trees, nest trees). Assessment, conducted individually or collaboratively, of forest cover types and habitats at the individual ownership level and, where credible data are available, across the landscape, and incorporation of findings into planning and management activities, where practical and when consistent with management objectives. Support of and participation in plans or programs for the conservation of old-growth forests in the region of ownership. Participation in programs and demonstration of activities as appropriate to limit the introduction, impact, and spread of invasive exotic plants and animals that directly threaten or are likely to threaten native plant and animal communities. Program to incorporate the role of prescribed

or natural fire where appropriate.	
Rationale for proposed change:	Proposed New Language:
<p>•4.1.3 – Continue to focus protection needs on G1/G2 species and communities. Avoid consideration of S1/S2 species and communities. Species and community survey data is often incomplete or weak within a state and generates several S1/S2 calls with validity questioned even by the state agencies.</p>	[No Comment]
<p>OK</p>	[No Comment]
<p>#5 - With concern about early and late successional habitats, the addition of a size class assessment in an ownership within a state or a subset, thereof, it is important to have an idea of the size class distribution of forest cover types that exist within an ownership so that it can be compared to regional biological diversity models.</p> <p>The phrase “and when consistent with management objectives” could be an unnecessary loophole to avoid developing a strategy to promote biological diversity when gaps are identified.</p>	<p>Add “size classes” after “cover types.” Delete “and when consistent with management objectives”</p> <p>#2 – add “(i.e. floral and faunal)” to end</p>
<p>Programs should be in place to protect not only species with legal protection status, but also those listed as rare (G3, S1, S2 and S3) in natural heritage databases. Legal status is often affected as much by political as well as biological considerations, and it should be biological status that is determinative. Requiring protection of only legally protected species and G1 and G2 species (Indicator 3) leave a large gap into which many uncommon species would fall. (See rationale for revised indicator under indicators for Performance Measure 4.2 for additional rationale for inclusion of these species.)</p>	<p>Indicator 2 should be changed to read "Program to protect rare, threatened and endangered species."</p> <p>(A new definition for rare species is proposed.)</p>
<p>Diversity is the best way to ensure adaptation to future changes in climate. A monoculture crop has a much smaller chance of adapting than a mixture of different individuals.</p>	<p>9. Reforestation of timberlands with genetically diverse (ie not clonal monoculture) stock from tree improvement programs or co-ops.</p>
<p>As noted above, these indicators do not adequately address maintaining, enhancing, or restoring (as necessary) native biological diversity.</p>	<p>Replace the current indicator set with the following indicators.</p>
<p>Indicator 3. [Name Omitted] recommends that the future standard continue to focus protection needs on G1/G2 species and communities. In addition, the standard should continue to avoid consideration of requiring protection for S1/S2 species and communities. Such consideration of protection for state-level ranked species and communities remains quite problematic, since states on the edge of species' or communities' ranges may assign high local conservation rankings for individuals or habitats that otherwise are abundant and not imperiled in the</p>	[No Comment]

<p>rest of their ranges.</p> <p>Indicator 5. The SFI Interpretation Document states “that there are a number of ways Program Participants can show that they are taking steps to consider impacts of their own management activities with knowledge and context of existing landscape conditions to meet the spirit and intent of this Objective.”</p> <p>SFI, Inc. should clarify this interpretation and provide additional detail.</p> <p>Indicator 8. The “where appropriate” must be retained.</p>	
<p>Indicator 4.1.6: Suggest rewriting this indicator. This indicator appears to have been written to address the controversy of old-growth retention in Pacific Northwest wet forests where pre-European settlement forest stands still exist AND where fire suppression has not had a significant effect on overstory and understory species composition, woody debris amounts, etc. It is ecologically inappropriate to apply this to all forested ecosystems that are managed under SFI. In many regions, the "oldest" trees in the area are those in town squares and the oldest urban neighborhoods, not in the forested areas. Further, in areas with historically frequent fire cycles, "unmanaged" forest types with older trees and associated structure are NOT representative of true "natural" or "pre-European settlement" forest types because they are a product of decades of fire suppression and have a very different overstory and understory species composition, woody debris amounts, etc. It is unreasonable and inappropriate to expect landowners in all regions where SFI is implemented to seek out opportunities to support "old-growth" conservation since this terminology may be ecologically meaningless depending on the location of the landowner. Suggest that this indicator be rewritten to encourage landowners to participate in opportunities to conserve existing naturally occurring older forest ecosystems that have not been significantly altered by human management INCLUDING fire suppression. The use of the politically charged and narrowly defined term "old-growth" needs to be removed and replaced with a more modern and inclusive terminology for these older forest ecosystems.</p>	<p>Indicator 4.1.6: Suggest deleting current language and replacing with: "Support of and participation in plans or programs for the conservation of naturally occurring older forest ecosystems." and that "older forest ecosystems" replace "old-growth" in the definitions. See "Definitions" section for proposed new definition.</p>
<ul style="list-style-type: none"> • “Ecological communities” can be measured directly and provides more concise language. 	<p>1. Program to promote the conservation of native biological diversity, including species, wildlife habitats,</p>

- The definition of natural forest conditions (above) is consistent with these biodiversity goals and provides more specific guidance.
- The only reliable and verifiable way to locate imperiled species is via standardized survey methods.
- Threatened and endangered species need the same level of management and protection as imperiled and critically imperiled species.
- Protection cannot be limited to “viable occurrences” of imperiled species, because these species are so rare, all individuals must be protected to prevent extinction.
- Because sites will be located, they will be “known” (redundant).
- All life stages need protection to increase the viability of imperiled species.
- “Best scientific information” is already defined, might as well use it.
- “Inventory” seems more appropriate here than “assessment”, and findings should be incorporated whether or not they are practical and consistent with management objectives.
- All remaining old-growth forests need protection because they are already a rare, yet disproportionately valuable, ecosystem type.
- Anti-invasive species activities are always appropriate for increasing sustainability, not all invasive species are exotic, invasive can also have indirect threats, and harmful invasive species are not limited to plants and animals (i.e. pathogens, insects).
- Need to clarify the purpose for using prescribed or natural fire.

- and ecological communities, at stand and landscape levels by managing for natural forest conditions.
2. Program to locate (via standardized survey) and protect sites of critically imperiled, imperiled, threatened, and endangered species and communities prior to harvest.
 - a. Locate and protect habitat areas critical to all life stages, including breeding, rearing, dispersal, foraging, and roosting areas.
 - b. Program may be developed independently or collaboratively and may include Program Participant management, cooperation with other stakeholders, or use of easements, conservation land sales, exchanges, or other conservation strategies.
 3. Development and implementation of criteria, as guided by regionally appropriate best scientific information, for retention and recruitment of stand-level wildlife habitat elements such as snags, logs, down woody debris, and den/nest or mast trees of sufficient size, abundance, distribution, and variable degrees of decay to support wildlife associated with these habitat features.
 4. Inventory, conducted individually or collaboratively, of forest cover types and habitats at the individual ownership level and, where credible data are available, across the landscape, and incorporation of findings into planning and management activities.
 5. Support of and participation in programs for the conservation of all remaining old-growth forests, endangered forests, major tropical wilderness areas, and biodiversity hotspots in the region of ownership to protect their inherent ecological functions and values.
 6. Participation in programs and demonstration of activities to limit the introduction, impact, and spread of invasive species that directly threaten, indirectly threaten, or are likely to threaten native plant and animal communities.
 7. Program to incorporate the role of prescribed or natural fire where appropriate to restore natural disturbance regimes and habitat conditions for fire-adapted species.

Define endangered forests as “native forest ecosystems of high ecological value that require protection from intensive industrial use to maintain these values. Ecological components used to define endangered forests include:

1. Intact forest landscapes
2. Remnant forests and restoration cores, including:
3. Landscape connectivity
4. Rare forest types (composition and structure)
5. Forests of high species richness (alpha and beta diversity)

	<p>6. Forests containing high concentrations of rare and endangered species 7. Forests of high endemism 8. Core habitat for focal species (aquatic and terrestrial) 9. Forests exhibiting rare ecological and evolutionary phenomena</p> <p>Steps for identifying and mapping endangered forests are available at: http://www.forestethics.org/downloads/EFDefinitions_April_2006_2.pdf</p>
Same as above	Drop the stand-level language and requirements
Indicator 6.: This indicator is stated in nebulous terms. SFIS requirements should be stated in clear, well-defined terms. What constitutes an adequate "plan" or "program?" What level of "support of and participation in" is sufficient? What if there is not any old growth in the "region?" How is "the region" defined? What if there is already an adequate amount of old-growth protected in the region?	This indicator should be reworded so that it simply reflects that conservation of old-growth may be desirable and that the PP should participate in such efforts as appropriate.
4.1.3 --- Continue to focus protection needs on G1/G2 species and communities. Avoid consideration of S1/S2 species and communities	[No Comment]
[No Comment]	No new or additional language. This is an excellent expression of the correct process to work in a forest and preserve its natural character at the same time.
Protection of old-growth forests has not been identified as a conservation priority equally across the US and Canada. Indicator 6 should reflect this.	Support of and participation in plans or programs for the conservation of old-growth forests in the region of ownership, where conservation of old growth has been identified as a regional priority.
3. SFI should go beyond imperiled spp. and communities and start protecting vulnerable ones to be a leadership standard. 5. "Where practical and when consistent with management objectives" totally nullifies the intent of the indicator.	3. Plans to locate and protect known sites associated with viable occurrences of critically imperiled, imperiled and vulnerable species and communities... 5. Assessment of forest cover types and habitats at the individual ownership level...and incorporation of findings into planning and management objectives.
Indicator 6: Old growth is only one component of the broader concept of biodiversity.	Indicator 6: Support of and participation in plans or programs for the conservation of biodiversity in the region of ownership.
4.1.3 -- Continue to focus protection needs on G1/G2 species and communities. Avoid consideration of S1/S2 species and communities	No proposed changes
include invasive and destructive insect control programs	# Participation in programs and demonstration of activities as appropriate to limit the introduction, impact, and spread of invasive exotic plants, insects and animals that directly threaten or are likely to threaten native plant and animal communities.
<p>Please use this space to propose any additional indicators for Performance Measure 4.1</p>	

1. Program participants develop and implement guidelines addressing indicators 4.1.2 to 4.1.10 that are based on applicable scientific literature, published regional guidelines, and consultation with natural resource agencies and experts in the different sub-disciplines of biodiversity management.
 2. Program participants maintain, enhance, or restore state- and federal-listed threatened and endangered species and other species and natural communities classified as G1-G3 and S1-S2 by NatureServe and/or state/provincial Natural Heritage programs.
 3. Program participants maintain, enhance, or restore habitat for Species of Greatest Conservation Need (identified in state Wildlife Action Plans) and other significant wildlife habitats identified by state and federal conservation agencies.
 4. As applicable to the management unit size and natural disturbance processes, program participants maintain, enhance, or restore habitat for species with multi-stand habitat (up to and including landscape-scale habitat requirements) including,
 - a. forest interior specialists,
 - b. early successional forest specialists,
 - c. mature forest specialists,
 - d. forest understory species, and
 - e. species with large territories or home ranges whose populations may be dependent on specific habitat conditions.
 5. Program participants maintain, enhance, or restore habitat connectivity for plants and animals.
 6. Program participants maintain, enhance, or restore effective riparian zone functions for streams, rivers, lakes and ponds, vernal pools/ponds, and wetlands. RMZs should be managed in a way (width, condition of vegetation) that meets the varied habitat requirements of plants and animals that depend on habitats adjacent to water.
 7. In all harvests program participants retain and promote sufficient numbers of trees in sizes and conditions (live, decayed, standing dead, and dead/down) required to maintain healthy populations of associated native biota, including but not limited to cavity nesting species, insects, fungi, and other organisms associated with large live trees and dead and/or decaying wood.
 8. During even-aged management regeneration harvests, program participants provide effective retention of vegetation (as indicated by patch size, plant community type, and landscape context) that will provide refuges for plants and animals with limited dispersal ability and that will provide structural diversity in developing stands.
 9. Program participants ensure that harvest practices retain (or return) sufficient volumes of coarse and fine woody material on the forest floor to maintain soil productivity and forest floor habitat functions.
 10. Program participants develop and implement programs for the assessment, monitoring, and control of invasive species.
 11. Sustainable harvest calculations are planned to allow for the development and maintenance of the biodiversity elements addressed in indicators 4.1.2 through 4.1.10.
8. Maintenance of intact buffers around all water bodies to conserve water quality and terrestrial habitat inputs for aquatic fauna and riparian-dependent species (i.e. fish and amphibians).
 9. Prohibition of any activities that “take” or “harm” critically imperiled, imperiled, threatened, or endangered species.
 - a. take: harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect
 - b. harm: significant habitat modification that actually kills or injures a listed species through impairment of

essential behavior (e.g., nesting or reproduction)
 10. Minimization of cumulative negative effects to habitat critical to critically imperiled, imperiled, threatened, or endangered species.

9. Species recovery plans shall be designed to meliorate conditions or habitat for all species present, not merely for one target species in isolation.

9. Maintain, enhance, or restore the range of natural plant communities and associated development stages that are characteristic of the forest.
 10. Identify and map High Conservation Value Forests across the ownership or management unit.
 11. Describe in management planning documents the measures necessary to ensure the maintenance and/or enhancement of all high conservation values present in all identified HCVF areas, including the precautions required to avoid risks or impacts to such values. Actively implement and monitor these measures.
 10. Old growth forests and stands are conserved on Program Participant lands.

include invasive and destructive insect control programs

Performance Measure 4.2. Program Participants shall apply knowledge gained through research, science, technology, and field experience to manage wildlife habitat and contribute to the conservation of biological diversity.

Rationale for proposed change:	Proposed New Language:
OK	[No Comment]
The performance measure and associated indicators may not be necessary if the new indicators for 4.1 are adopted.	See above and 4.1
The definition of natural forest conditions (above) is consistent with these biodiversity goals and provides more specific guidance.	Program Participants shall apply knowledge gained through research, science, technology, and field experience to manage wildlife habitat to natural forest conditions and contribute to the conservation of biological diversity.
The indicators under this performance measure are inadequate to assure that the performance measure is fully addressed.	[No Comment]

Indicators: Collection of information on critically imperiled and imperiled species and communities and other biodiversity-related data through forest inventory processes, mapping, or participation in external programs, such as NatureServe, state or provincial heritage programs, or other credible systems. Such participation may include providing nonproprietary scientific information, time, and assistance by staff, or in-kind or direct financial support. A methodology to incorporate research results and field applications of biodiversity and ecosystem research into forest management decisions.

Rationale for proposed change:	Proposed New Language:
consistency in terms	change "critically imperiled and imperiled" to "threatened and endangered"
We have seen few examples of inventories that have a wide enough range of ecological values that they can be used in the ways described in section 4.2.	Add "natural" between "provincial" and "heritage programs" Change "systems" to "sources"

<p>Forest management inventories (the definition below implicitly includes management objectives) are often incomplete. This information is usually derived from scientific studies and other external programs - they should be encouraged to participate in a range of activities.</p> <p>Systems in first sentences is not appropriate</p>	<p>#1 - replace "or" with "and" to read " and participation in external programs, such..."</p>
<p>Limiting requirements for the collection of information to G1 and G2 species and communities (the rarest of the rare) is too limiting. Of equal importance are species that, while they might be globally secure and common in parts of their range, are locally uncommon and thus threatened with local extirpation. Often these are species at the edge of their range. Because they occupy the extreme habitats in which the species occur, they are likely to contain genetic characteristics that could enhance the ability of the species to adapt to changing conditions. This is especially important given the likely species shifts that will result from changes in global and local climates.</p> <p>While it may be assumed that these elements of biodiversity will be considered under more generic requirements for the conservation of biodiversity (something that many Program Participants are likely doing), requirements for acquiring knowledge of and protecting these species should not be left to assumption but should be explicitly</p>	<p>Indicator 1 should be revised to read "Collection of information on critically imperiled, imperiled and rare species and communities..."</p> <p>(A new definition for rare species is proposed.)</p>
<p>Clonal plantations are not appropriate to a changing climate. Great diversity is needed to adapt to a rapidly changing environment.</p>	<p>3. No clonal forestry. Seedlings from plus trees are ok.</p>
<p>Indicator 1. [Name Omitted] recommends that "collection of information" not be interpreted as requiring surveys, otherwise this indicator comes in conflict with current interpretation of 4.1.3 above (Interpretation # 4.5).</p>	<p>[No Comment]</p>
<ul style="list-style-type: none"> • Threatened and endangered species need the same level of management and protection as imperiled and critically imperiled species. • This indicator describes the collection of habitat data specifically, whereas presence data is addressed under the previous performance measure. • For systems to be judged as "credible" is too subjective. 	<ol style="list-style-type: none"> 1. Collection of information on critically imperiled, imperiled, threatened and endangered species and communities and other biodiversity-related habitat data through forest inventory processes, mapping, or participation in external programs, such as NatureServe, state or provincial heritage programs, or other equivalent systems. Such participation may include providing nonproprietary scientific information, time, and assistance by staff, or in-kind or direct financial support. 2. A methodology to incorporate research results and field applications of biodiversity and ecosystem research into forest management decisions.
<p>See above.</p>	<p>1.Collection of information on critically imperiled, imperiled, and vulnerable species and communities</p>

	and other biodiversity-related data through forest inventory processes..
Why restrict wildlife concerns to such a high-level? More common species should be given adequate consideration as well. Each property should know the species of greatest conservation need, regardless of whether they are imperiled or not. Deer impacts are critical in North America and should be identified as a special management consideration.	[No Comment]
broaden scope by adding more global meanings	add "in the country in which the program participants operates"

Please use this space to propose any additional indicators for Performance Measure 4.2

Please use this space to propose any additional Performance Measures and Associated Indicators for Objective 4

Proposed Performance Measure 4.3. Program Participants shall incorporate consideration of the effects of climate change in their plans to manage wildlife habitat and contribute to the conservation of biological diversity.

Indicators:

1. Climate change considerations incorporated in wildlife habitat management plans.
2. Documented use of best available information in development and implementation of wildlife habitat management plans.
3. Participation in international, national, regional or local programs used to inform the mitigation of climate change on wildlife habitats.

Objective 5. To manage the visual impact of harvesting and other forest operations.

Rationale for proposed change:	Proposed New Language:
Wording is vague. What we are after is to improve the aesthetics of a harvest job or woods road.	To limit and or reduce the negative impacts on forest aesthetics casued by logging and road building operations.
OK	[No Comment]
Visual impact isn't done to protect biodiversity, doesn't promote economic productivity, and has questionable social benfits when measured against the social costs of reduced production and higher land costs. Suggest deletion	[No Comment]
To "manage" the visual impact is too ambiguous.	To minimize the negative visual impacts of harvesting

	and other forest operations.
As currently set up, the performance measures that support this objective seem to be designed primarily to minimize public perceptions that clear cuts look bad. Forest aesthetic management should be more robust than concern about an arbitrary clear cut size and green-up. Timber sale design is important for any type of regeneration harvest or intermediate treatment. Forest aesthtics are also important for recreation planning, facility planning, roads, trails, etc.	[No Comment]
<p>Performance Measure 5.1. Program Participants shall manage the impact of harvesting on visual quality.</p>	
Rationale for proposed change:	Proposed New Language:
Workding of Measure is too vague.	Program Participant shall reduce the negative impacts of harvesting on visual quality.
OK	[No Comment]
To “manage” the visual impact is too ambiguous.	Program Participants shall minimize the negative impacts of harvesting on visual quality.
Managing the impact can cover a wide range of activities from simply advising the owner or the publics that the harvesting will look rough, to taking pro-active steps to mitigate the impact to an affordable level of effectiveness.	Program participants shall mitigate the impact of harvesting on visually sensitive sites.
<p>Indicators: Program to address visual quality management. Incorporation of aesthetic considerations in harvesting, road, landing design and management, and other management activities where visual impacts are a concern.</p>	
Rationale for proposed change:	Proposed New Language:
Vague	1. Program participants to address the negative impacts of visual quality management.
OK	
[No Comment]	#2 - Add “work” after “road” and “buffers” before “other management activities”
<ul style="list-style-type: none"> • Visual quality should be managed, not merely addressed in a program. • Visual impacts are a “concern” specifically where they are perceived by the public. 	<ol style="list-style-type: none"> 1. Program to manage visual quality. 2. Incorporation of aesthetic considerations in harvesting, road, landing design and management, and other management activities where visual impacts to the public are possible.
To differentiate lands that are of visual concern from those that are not or have very little, a process to identify the ones of visual quality concern seems logical.	[No Comment]
Landform analysis needs to be part of the harvest planning process to best fit the harvest site to the forest stand, the lay of the land, and applicable	<ol style="list-style-type: none"> 1. Program to incorporate visual quality practices on visually sensitive sites. 2. Program to use landform analysis and tools in

viewsheds.	planning harvest operations. 3. Incorporation of visual quality practices on sensitive sites in harvesting , road design, log landing design and management, and other forest management activities.
------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Please use this space to propose any additional indicators for Performance Measure 5.1

The first indicator should be the establishment of a set of visual quality management objectives for the ownership in the plan.

3.Process to identify and quantify the visual quality value of the participants land ownership.

Program to distinguish between highly sensitive sites and less sensitive sites.

Performance Measure 5.2. Program Participants shall manage the size, shape, and placement of clearcut harvests.

Rationale for proposed change:	Proposed New Language:
OK	[No Comment]
Current measure offers no explanation as to why this should be accomplished	Performance Measure 5.2. Program Participants shall manage the size, shape, and placement of clearcut harvests to maximize forest health and mimic natural disturbances
[No Comment]	reword 'clearcut harvests' to 'harvest area'
Most even-age and some uneven-age silvicultural systems use harvest methods that have visual impact in certain circumstances. Why limit the management of the size, shape and placement to clearcut harvest methods? Other harvest methods impact visual quality.	Program Participants shall manage the size, shape, and placement of harvest units.

Indicators: Average size of clearcut harvest areas does not exceed 120 acres, except when necessary to respond to forest health emergencies or other natural catastrophes. Documentation through internal records of clearcut size and the process for calculating average size.

Rationale for proposed change:	Proposed New Language:
Indicator 1 and 2 is not needed. Sustainable harvest should be the only limiting factor.	[No Comment]
OK	[No Comment]
[No Comment]	#2 – add “or for the purpose of research” to end
5.2.1 Same comment as 2.1, the standard should avoid prescriptive approach. The goal is to achieve an objective, not to achieve a specific size of harvested area. For example, in the boreal forest, actually researcher are favorizing natural disturbance approach	Average size of clearcut harvested area is adapted to the type of forest and regional Best management Practices.

<p>to maintain biodiversity and it could end with clearcut bigger than 120 acres. For more information , www.web2.mnr.gov.on.ca/mnr/forests/forestdoc/ebr//guide/natural_dist/part%20one.pdf.</p>	
<p>5.2.1- the reference to 120 acres is not possible in Ontario (and CAnada) in particular on Crown managed lands where by law, and under the associated manuals and guidelines, harvest areas are designed to often exceed this size in order to address biological and ecological requirements of the forest and eco-regions. The over-riding principle of legal compliance has had to take precedence over this indicator to-date...</p>	<p>reword any reference to harvest area size to 'as required by relevant regulatory management guidelines'</p>
<p>Rationale: Restricting clearcut size prevents management options for wildlife, etc. Research shows larger clearcuts may benefit certain species.</p>	<p>Change: deleted indicator 5.2.1 Average clearcut size of 120 acres.</p>
<p>This is a visual sensitivity issue that should already be addressed in participants visual quality management program.</p>	<p>Eliminate Indicator 1.</p>
<ul style="list-style-type: none"> • Using the average clearcut size as a metric means many clearcuts can exceed this size without limit. It is more sustainable for long-term productivity and biodiversity to designate the maximum size of clearcuts. • Clearcuts of 120 acres (or larger) without retention are too large to be sustainable. • Clearcut sizes after forest health emergencies or other natural catastrophes should not be allowed to go unchecked. • Tree retention areas should also be documented. 	<ol style="list-style-type: none"> 1. Maximum size of clearcut harvest areas without within-stand retention does not exceed 40 acres. 2. Documentation through internal records of clearcut size, the process for calculating size, and maps of tree retention areas.
<p>The cost of mobilization into remote sites in Alaska is extreme. Roadbuilding and logging equipment must be barged in, camps must be established, the camps include sewer, water and electrical systems. Larger camps include schools. In order to keep costs competitive, large volumes must be harvested. Consequently, private landowners frequently harvest all of their timber in these remote locations in a single entry. This usually results in clearcuts that are much larger than 120 acres.</p>	<p>Add an exception for remote sites where multiple mobilizations are not economically feasible.</p>
<p>Indicator 1.: This indicator is not appropriate in parts of Canada where forests are managed under Natural Disturbance Pattern Emulation Guidelines or caribou guidelines or as part of any caribou recovery strategy, or salvage harvest resulting from fire, blow-down or other natural disturbances.</p> <p>To-date this indicator has been addressed in Canada by the over-ruling principle of legal compliance. In some forest regions, or parts thereof, forest management plans are required to emulate disturbance patterns in excess of this size because it is required by law (as per management guidelines appropriate to the forest / ecoregion).</p>	<p>Reword to reflect all biological and legal requirements in US and Canada.</p>

<p>Also, in some forest regions this average disturbance size does not contribute towards the most desirable forest condition.</p>	
<p>Explanation Comment - Silviculture prescriptions are applied to stands. The timing and sequence of silviculture treatments to meet goals and objectives is forest management. In this context, clearcut harvesting is not a silviculture treatment but an operation applied to some “area”, “management unit” or “compartment” that may include multiple stands. The re-definition of stand or defining “area” “management unit”/compartment should be considered to allow this Performance Measure and associated Indicators to follow forest management and silviculture definitions and the use of “area” in other parts of the SFI Standards dealing with green up and adjacency.</p> <p>Rational - Seed-tree, Shelterwood, group/patch cuts, deferment harvests, row thinnings, and others are harvest methods that can have visual impacts in areas of visual concern. It seems that indicators that demonstrate the participant's evaluation of the social visual impact value along with the ecologic, and economic values to arrive at a management strategy and prescription would be desirable.</p>	<p>[No Comment]</p>
<p>Indicator 1: Clarification that the indicator addresses not only size of a harvest area, but also the size of contiguous harvest areas if two areas happen to be adjacent to each other and the green-up requirement is not met. Also, T&E species concerns may be a reason for clearcut harvest areas exceeding 120 acres (i.e. [Name Omitted]).</p>	<p>Indicator 1: Average size of clearcut harvest areas, or of contiguous clearcut harvest areas when the green-up standard is not met, does not exceed 120 acres, except when necessary to respond to forest health emergencies, T&E species concerns, or natural catastrophes.</p>
<p>The dimensions of a clearcut should consider natural stand characteristics and changes in stand boundaries. Maximum size should not be set by a numerical value.</p>	<ol style="list-style-type: none"> 1. Size of clearcut is determined by the natural boundary of a stand or stands, (or a plantation), except to respond to forest health emergencies or other natural disaster. 2. Documentation through internal records the size, shape, and age of natural forest stands.
<p>Please use this space to propose any additional indicators for Performance Measure 5.2</p>	
<p>Change: deleted indicator 5.2.1 Average clearcut size of 120 acres.</p>	
<ol style="list-style-type: none"> 3. Maximum size of clearcuts is consistent with the patterns of forest stands found within the natural landscape. 4. Non-adjacent placement of clearcuts until green-up requirements have been met. 	

3. Documentation through internal records demonstrating some evaluation of the social, ecologic and economic impacts of harvest prescriptions in areas that have been identified as visually important, including any physical and/or legal constraints .

Performance Measure 5.3. Program Participants shall adopt a green-up requirement or alternative methods that provide for visual quality.

Rationale for proposed change:	Proposed New Language:
OK	[No Comment]
5.3.3 It is the same comment as before, the real objective is before harvesting residual blocks adjacent to a clearcut area, the regeneration should be in desirable species and free to grow. It is also to avoid visual impact of harvested area.	5.3.3 Trees in clearcut harvested areas are free to growth at a desired level of stocking, accordingly to regional BMPs and type of species or forests before adjacent areas are cut.
<ul style="list-style-type: none"> Alternative methods must be equivalent to stated green-up requirement to be acceptable. Visual quality must explicitly be adequate. 	Program Participants shall adopt a green-up requirement or equivalent alternative methods that provide for adequate visual quality.

Indicators: Program implementing the green-up requirement or alternative methods. Program implementing the green-up requirement or alternative methods. Harvest area tracking system to demonstrate compliance with the green-up requirement or alternative methods. Trees in clearcut harvest areas are at least 3 years old or 5 feet high at the desired level of stocking before adjacent areas are clearcut, or as appropriate to address operational and economic considerations, alternative methods to reach the performance measure are utilized by the Program Participant.

Rationale for proposed change:	Proposed New Language:
OK	[No Comment]
<p>#2 - Metrics measures should be included throughout. Also divide into two sentences – too hard to read</p> <p>#2 - What is the basis for 5.3 indicator 3? In many areas of the boreal forest and with softwoods such as black spruce more than 3 years are required for green-up. Why not just have a height requirement?</p>	#2 - remove: "at least 3 years"
Indicator 3. Alternative option is important to retain in Indicator 3.	[No Comment]
Rationale: Unrealistic with some species managed for in some areas, example, black spruce, moose management, etc.	Change: deleted indicator 5.3.3; Green up requirement of 3 years old or 5 feet high prior to adjacent clearcuts.
Performance Measure 5.3 requires the Program Participant to adopt a green-up requirement, yet indicator 5.3.3 sets what that green-up requirement is. This indicator is addressed in the program that the participant has implemented addressing these issues.	Remove indicator 5.3.3.
<ul style="list-style-type: none"> The use of alternative methods “as appropriate to address operational and economic considerations” is way too subjective to ensure adequate visual quality. 	1. Trees in clearcut harvest areas are at least 10 feet high or reach canopy closure before adjacent areas are clearcut, or equivalent alternative methods to

<ul style="list-style-type: none"> • Age not a uniform indicator among species or regions. • Five feet is not high enough to prevent visual impacts. • The desired level of stocking is too subjective whereas canopy closure can be measured directly. • Alternative methods must be equivalent to stated green-up requirement to be acceptable. 	<p>reach the performance measure are utilized by the Program Participant.</p> <ol style="list-style-type: none"> 2. Program implementing the green-up requirement or equivalent alternative methods. 3. Harvest area tracking system to demonstrate compliance with the green-up requirement or equivalent alternative methods.
<p>Indicator 3: There are differing interpretations by auditors regarding when the green-up requirement applies. Some auditors interpret the indicator to apply to all adjacent clearcuts, even if it is a very small clearcut located next to another very small clearcut (for example, a 2 acre clearcut located next to another 2 acre clearcut). Other auditors feel this indicator is linked to a 120 acre size limit (in indicator 5.2.1), so that the adjacency issue doesn't kick in until the acreage of the two harvest areas exceeds 120 acres. Clarification on this issue would be helpful. In addition, enhancement of habitat for rare and endangered species may be a legitimate reason for variance to the green-up requirement, for example, the need for large clearcut areas for [Name Omitted].</p>	<p>Indicator 3: When adjacent clearcut areas total 120 acres or greater, trees in clearcut harvest areas are at least 3 years old or 5 feet high at the desired level of stocking before adjacent areas are clearcut. Alternative methods to reach the performance measure may be utilized by the Program Participant in order to address operational and economic considerations, or other resource issues such as protection or enhancement of rare and endangered species.</p>
<p>Please use this space to propose any additional indicators for Performance Measure 5.3</p>	
<p>4. Program to evaluate and minimize cumulative negative ecological effects of harvested areas across the landscape.</p>	
<p>Please use this space to propose any additional Performance Measures and Associated Indicators for Objective 5</p>	
<p><i>Objective 6. To manage Program Participant lands that are ecologically, geologically, historically, or culturally important in a manner that recognizes their special qualities.</i></p>	
<p>Rationale for proposed change:</p>	<p>Proposed New Language:</p>
<p>Recognizing doesn't always equal protecting or maintaining. If characteristics are important they are worthy or maintaining or protecting.</p>	<p>To manage Program Participant lands that are ecologically, geologically, historically, or culturally important in a manner that MAINTAINS their important qualities.</p>
<p>OK</p>	<p>[No Comment]</p>
<p>The idea is to integrate SFM throughout the objectives. No reason exists to exclude one aspect</p>	<p>Objective 6. To manage Program Participant lands that are ecologically, geologically, historically, socially,</p>

of SFM or to give it preference over other SFM attributes.	economically, or culturally important in a manner that recognizes their special qualities.
Special qualities need to be preserved, not merely “recognized”.	To manage Program Participant lands that are ecologically, geologically, historically, or culturally important in a manner that preserves their special qualities.
If this is the SFI counterpart to FSC Principle 9 (High Conservation Value Forests), then it is totally inadequate. The SFI standard needs more detail in how to assess special sites, including some method of stakeholder consultation to help determine values that need protecting.	[No Comment]

Performance Measure 6.1. Program Participants shall identify special sites and manage them in a manner appropriate for their unique features.

Rationale for proposed change:	Proposed New Language:
see above	see above
OK	[No Comment]
See proposed changes for Objective 4, Performance Measure 4.1, and associate indicators.	[No Comment]
To manage special sites in an “appropriate” manner does not ensure they will be protected.	Program Participants shall identify special sites and protect their unique features.

Indicators: Use of existing natural heritage data and expert advice in identifying or selecting sites for protection because of their ecologically, geologically, historically, or culturally important qualities. Appropriate mapping, cataloging, and management of identified special sites.

Rationale for proposed change:	Proposed New Language:
Should include the protection of special sites to Indicator #2	Indicator 2. Appropriate mapping, cataloging, and management of identified special sites in a manner that protects their unique characteristics.
OK	[No Comment]
#1 - This needs to be validated by the entity through documentation of correspondence or results or reports. Natural heritage data is not enough and expert advice is too vague. Need something more specific on the cultural side of things, in particular. #2 – There’s nothing here that specifically addresses a policy for discovery of previously unknown sites or artifacts. Also, the measure implies proper management but there are no specific indicators for this beyond information and mapping. What would I look for as an auditor to see that “proper management” is taking place?	#1 – Add “Documented” to beginning, before “use”
Consistency with changes to Objective	Use of existing natural heritage data and expert advice in identifying or selecting sites for protection because of their ecologically, geologically, historically,

	economically, social, or culturally important qualities.
<ul style="list-style-type: none"> • Field experience should also be used to identify special sites. • All identifiable special sites need protection, not only “selected” sites. • Examples of special sites provide a useful checklist. • “Appropriate” management of special sites is too subjective to ensure their protection. 	<ol style="list-style-type: none"> 1. Use of existing natural heritage data, expert advice, and field experience in identifying sites for protection because of their ecologically, geologically, historically, or culturally important qualities, including roadless areas, biodiversity hotspots, major tropical wilderness areas, old-growth forests, endangered forests, and archaeological sites. 2. Appropriate mapping, cataloging, and management to ensure protection of identified special sites.
Indicator 1: Special sites may need active, special management such as restoration, not just protection (which can be interpreted as no management).	Indicator 1: Use of existing natural heritage data and expert advice in identifying or selecting sites for protection or special management because of their ecologically, geologically, historically, or culturally important qualities.
<p>Please use this space to propose any additional indicators for Performance Measure 6.1</p>	
<p>Please use this space to propose any additional Performance Measures and Associated Indicators for Objective 6</p>	
<p>Performance Measure 7.1. Program Participants shall employ appropriate forest harvesting technology and “in-woods” manufacturing processes and practices to minimize waste and ensure efficient utilization of harvested trees, where consistent with other SFI Standard objectives.</p>	
Rationale for proposed change:	Proposed New Language:
None needed	[No Comment]
OK	[No Comment]
Shipping wood products over long distances increases use of fossil fuels, a non-renewable resource. The use of non-renewables is not sustainable over long periods of time.	Wood products should be marketed/sold locally (within 250 miles of the mill and/or landbase).
To clarify that "waste" refers to timber harvesting waste and that we are talking about tree utilization. Also to ensure that this performance measure is consistent with countering performance measures elsewhere. One person's waste is another person's downed woody debris.	Performance Measure 7.1. Program Participants shall employ appropriate forest harvesting technology and “in-woods” manufacturing processes and practices to minimize [italics] timber waste and ensure efficient utilization of harvested trees, where consistent with other Sustainable Forestry Initiative Standard objectives. See Performance Measures 2.3 and 4.1 for further guidance on balancing timber utilization with management requirements for maintaining wildlife habitats and the conservation of soil productivity and biological diversity.
While "in-woods" manufacturing is a hot topic in certain	OMIT: and "in-woods" manufacturing processes

<p>circles, it is inconsistent with development of bio-mass and secondary wood products industries. Because of the tendentious and inflammatory nature of the proposal, it should be eliminated as a performance measure. It is inconsistent with the indicators.</p>	
<p>Indicator: Program or monitoring system to ensure efficient utilization, which may include provisions to ensure landings left clean with little waste; residues distributed to add organic and nutrient value to future forests; training or incentives to encourage loggers to enhance utilization; cooperation with mill managers for better utilization of species and low-grade material; merchandizing of harvested material to ensure use for its most beneficial purpose; development of markets for underutilized species and low-grade wood; periodic inspections and reports noting utilization and product separation; or exploration of alternative markets (e.g., energy markets).</p>	
Rationale for proposed change:	Proposed New Language:
OK	[No Comment]
<p>#1 - Should be “program and monitoring system” not “or,” and this implies documentation on some of these items. For example, a post-harvest site inspection to ensure that any spills have been cleaned up or that no significant waste is left on the ground</p> <p>#1a - Need to add something specific about fuel and hydraulic fluids and their proper use and disposal. Also, need something about fuel storage and taking the proper precautions.</p> <p>#7 - Efficient use of forest resources - or forestry resources? This section does not consider non-timber forest resources that may be economically important to indigenous peoples, recreationists (e.g. hunters, fishers, canoeists).</p>	<p>#1 – change “or” “and”</p> <p>#7 - h. exploration of alternative markets including non-timber forest products (e.g. energy markets, indigenous peoples cultural products and natural services).</p>
<p>Shipping wood products over long distances increases use of fossil fuels, a non-renewable resource. The use of non-renewables is not sustainable over long periods of time.</p>	<p>i. sells wood products primarily to local markets (within 250 miles). j. uses locally produced renewable energy to produce it's products. Ex. offices, mill operations, company vehicles, harvesting equipment, etc.</p>
<p>Best management practices and provincial laws specify amounts of course woody debris (downed woody debris) that must remain on site. These should be noted in this indicator.</p>	<p>i. A clear connection with downed woody debris requirements of Performance Measure 2.3, Indicator 4 and Performance Measure 4.1, Indicator 4.</p>
<p>[No Comment]</p>	<p>c. training or incentives to encourage loggers to enhance utilization such as incentive to rely on Master Certified loggers</p> <p>i. financial rewards to keep forest in forest land uses</p>
<p>Rationale: Utilization of forests damaged by insects, disease, and fire.</p>	<p>Change: added indicator f; Salvage forested areas infested by insects, disease, fire, wind, etc....</p>
<p>Indicator 1.b.: There should be allowance for use of</p>	<p>[No Comment]</p>

residues as bio-fuels where removal will not result in significant impact to site productivity.	
Relative to Indicator 1h, alternative markets are no longer in exploration phase. Rather, they are being actively developed.	h. continued development of alternative markets (e.g., energy markets)
<p>Please use this space to propose any additional indicators for Performance Measure 7.1</p>	
Rationale for proposed change:	Proposed New Language:
Change: added indicator f; Salvage forested areas infested by insects, disease, fire, wind, etc....	[No Comment]
[No Comment]	2. Any utilization program ensures that sufficient material is left on site for wildlife habitat, soil conservation, nutrient cycling, etc.
[No Comment]	<p>Proposed New Performance Measure 7.2. Where production of commodity wood-based biofuels are part, or in whole, the focus of management Program Participants shall ensure that biodiversity, soil productivity and the role of soil in sequestering carbon is incorporated in planning and management practices.</p> <p>Indicators:</p> <ol style="list-style-type: none"> 1. Biofuels production shall be incorporated in and accounted for in forest management plans. 2. Specific measures are in place to protect soils and soil productivity including measures to maintain soil-based carbon sequestration and soil nutrient recycling. <p>Proposed New Performance Measure 7.3. Forest management plans shall incorporate accounting for carbon stocks and where applicable measures to secure financial remuneration for stored carbon.</p>
<p>Please use this space to propose any additional Performance Measures and Associated Indicators for Objective 7</p>	
2. Any utilization program ensures that sufficient material is left on site for wildlife habitat, soil conservation, nutrient cycling, etc.	

Proposed New Performance Measure 7.2. Where production of commodity wood-based biofuels are part, or in whole, the focus of management Program Participants shall ensure that biodiversity, soil productivity and the role of soil in sequestering carbon is incorporated in planning and management practices.

Indicators:

1. Biofuels production shall be incorporated in and accounted for in forest management plans.
2. Specific measures are in place to protect soils and soil productivity including measures to maintain soil-based carbon sequestration and soil nutrient recycling.

Proposed New Performance Measure 7.3. Forest management plans shall incorporate accounting for carbon stocks and where applicable measures to secure financial remuneration for stored carbon.

SFIS OBJECTIVES FOR PROCUREMENT

Objective 8. To broaden the practice of sustainable forestry through procurement programs.

Rationale for proposed change:	Proposed New Language:
OK	[No Comment]
<p>SFI Chain of Custody is a product certification scheme which permits the accredited certification body to issue a certificate of conformity to the supplier for the certified product.</p> <p>It seems that the SFI procurement requirements and activities should be included in the audit criteria for the SFI "chain of custody" certification program.</p>	<p>The SFI "chain of custody" certification program includes the procurement activities for the SFI certified wood product from the forest to the final product.</p>
<p>One of the areas that could benefit from clarification on its interpretation would be this section as it relates to Overlapping Forest Resource Licensees in Ontario. OFRLs hold their own licence to harvest and may or may not be directly responsible for the silviculture on the forest, as ultimately the Sustainable Forest Licence holder (SFL) is responsible to ensure that the forested land is regenerated. In Ontario, OFRLs have for the most part been addressed through this section, however it is important to note that not all OFRLs provide</p>	[No Comment]

<p> fibre directly to the SFI program participant. In these instances, OFRLs have still been addressed through this section to ensure that their activities and responsibilities are adequately captures. This has led to some overlap with expectations under other objectives within the standard SFI, Inc. needs to recognize or acknowledge that in many circumstances, due to the lack of SICs & or their immediate proximity to Canada’s larger landscapes, CDN PPs (and not the SICs) are defining, and providing for logger training & landowner outreach programs. </p> <p>Need to “Canadianize” the standard.</p>	
<p> The basis for the sustainability of procurement programs should be described explicitly. The “Requirements for Fiber Sourcing, Chain of Custody, and Product Labels” should be incorporated directly into the SFIS to ensure compliance by all member companies. </p>	<p> To support the practice of sustainable forestry through procurement of wood products exclusively from forests certified by the SFI or Forest Stewardship Council (FSC) and enforcing adherence to all fiber sourcing, chain of custody, and product labels requirements by all Program Participants. </p>
<p> This Objective should clarify interpretation of Overlapping Forest Resource Licensees (OFRL) on public lands in Canada. OFRLs hold their own license to harvest and may or may not be responsible for silviculture on the forest, as ultimately the Sustainable License (SFL) Holder is responsible to ensure that the forested land is regenerated. In Ontario, OFRLs have for the most part been addressed through this section; however it is important to note that not all OFRLs provide fiber directly to the participant from their managed lands. In these instances, OFRLs have still been addressed through this section - which results in some overlap of other objectives. </p> <p> This is still most likely the best objective to capture OFRL operations since they are their own separate business entity. </p> <p> Procurement in Canada (ex/ Ontario) is getting increasingly complex as fiber is pursued from sources other than forestland. Example: chips directly from sawmills. So many of the procurement requirments regarding training, QLP's etc has limited applicability. Also, biomass is increasiningly being procured from unique non forest sources like municipal brush and non-wood fiber from farmers crops etc. All of this reinforces the importance of requesting clarity of the mstandard requirements with respect to the definition of procurement. </p>	<p> The terminology and title of the objective should be reworded so that it adequately captures Canadian Licensed operations - i.e. not just those that provide fiber directly to a mill facility but also those operations that occur within forested lands managed by the participant - albeit under license from the provincial governments. </p> <p> Address the Canadian context and alternative fiber sources. </p>

<p>Also, this Objective should be reworded so that direct vs. indirect fiber sources are defined separately and treated appropriately (a definition for indirect supplier is submitted in the Definition section). SFIS requirements should reflect the fact that tracking capabilities as well as influence levels regarding indirect supply sources are less than those for direct fiber sources. The data that is available and potentially reported about indirect suppliers can be ambiguous, difficult or impossible to ascertain, and/or redundant with data being reported by other Program Participants who are supplied by the same indirect suppliers (ex/ verification of logger training, BMP compliance, reforestation, etc.).</p>	
<p>8 --- Keep Objective 8 as a stand-alone objective, do not incorporate procurement requirements into other objectives</p>	<p>[No Comment]</p>
<p>For buyers of forest products seeking to endure their procurement supports high quality forest management Objective 8 is far to broad and open to interpretation. The intent of the objective is more appropriately addressed through chain of custody and not as part of the certification standard which should focus on the social, economic and environmental performance associated with the certified forestland.</p>	<p>[No Comment]</p>
<p>The procurement audit approach, especially as it applies to family forest parcels, would be far more credible if it were alligned with the Master Certified Logger program or a similar "Master Certified Forester" program that requires a forest management plan or, at a minimum, a harvest plan, for every parcel where wood is cut.</p>	<p>[No Comment]</p>
<p>Keep Objective 8 as a stand-alone objective. Please do not incorporate procurement requirements into other objectives.</p>	<p>[No Comment]</p>

Procurement from sources within the United States and Canada (8.1–8.4 apply)

Performance Measure 8.1. Program Participants shall encourage landowners to reforest following harvest, to use BMPs, and to identify and protect important habitat elements for wildlife, including critically imperiled and imperiled species and communities.

Rationale for proposed change:

Indicator 1.c. (visual quality management) does not have any context in PM 8.1, it is not mentioned like all the other indicators.

Proposed New Language:

Include visual quality management in the practices that participants encourage landowners.

Conservation

[Name Omitted] supports the creation of a

	<p>performance measure for a participant to receive some type of “credit” for habitat created through the logging plans or harvest plans for family forest landowners. To this end, we suggest adding the word "enhance" to PM 8.1: "...and to identify and protect or enhance" important habitat elements ..."</p> <p>[Name Omitted] supports a performance measure for invasive species awareness and cooperation with agencies, including requiring training.</p>
<p>Consistency of terms</p>	<p>Replace "critically imperiled and imperiled" with "threatened and endangered"</p>
<p>A certification scheme should have defined audit criteria. The word "encourage" is difficult to audit.</p>	<p>"shall require" rather than "encourage"</p> <p>Program Participants shall require landowners to...</p>
<p>[Name Omitted] recommends recognition of Certified Master Logger programs by SFI program.</p>	<p>Program Participants shall encourage landowners to reforest following harvest, to use BMPs, to use Certified Master Loggers for harvesting operations, and to identify and protect important elements for wildlife, including critically imperiled and imperiled species and communities.</p>
<p>Need to create market incentives for conversion to forest lands</p>	<p>Program Participants shall encourage landowners to engage in afforestation, reforest following harvest, to use BMPs, and to identify and protect important habitat elements for wildlife, including critically imperiled and imperiled species and communities.</p>
<p>The land owner may not be directly involved with the forestry operations and may have independent loggers managing and/or conducting the forestry operations on their lands. The underlying intent here should be to ensure that the information is provided to the most relevant parties and to the satisfaction of all parties</p>	<p>add 'and/or private land loggers' to all references to land owners</p>
<p>[Name Omitted] recommends that SFI, Inc. promotes the success rates of BMP compliance as a result of program participant efforts. SFI is built on a more collaborative approach that should recognize the successes of BMP compliance.</p> <p>[Name Omitted] recommends that if changes are considered to require use of BMPs in procurement contracts, the requirement only extends to the non-point source BMP's established by the states in accordance with section 319 of the Clean Water Act or equivalent Canadian law. We further recommend that any mandate include very precise language on the treatment of indirect suppliers.</p> <p>In addition, everyone is aware that matters of supply are subject to the antitrust laws. SFI, Inc. should obtain careful legal guidance on any new requirements in the procurement area. .</p>	<p>[No Comment]</p>

No changes required. Avoid any movement toward mandatory BMP's by indirect suppliers in voluntary BMP states. The standard should not be more restrictive than State resource law and regulation.	None required.
The only way to ensure sustainable forest practices are being used by landowners if they are SFI- or FSC-certified.	Program Participants shall procure wood products exclusively from landowners of SFI- or FSC-certified forests.
Should show intent to ensure that the information is provided to the most relevant party, which may not be the landowner.	Should be reworded to "...encourage landowners and/or those responsible for land management..."
8.1 --- While there appears to be significant discussion about this measure, SFI should resist changing it at this time.	[No Comment]
Program participant should strongly encourage landowners to follow objective 5 in addition to reforestation, using BMPs, and protecting wildlife habitat.	Program participants shall strongly encourage landowners to incorporate visual quality practices as provided in objective 5, to reforest following regeneration harvests, to use state determined water quality Best Management Practices, and to identify and protect important habitat for wildlife, including critically imperiled and imperiled species and communities.
8.1 Keep this measure substantively the same, as making it any more complex would unnecessarily add to landowner & operator costs without benefits to the resources. Abruptly changing this would erode relationships and programs that have been built and refined (at significant cost & effort) over the past decade to facilitate SFI objectives.	[No Comment]
•8.1 – Promote no change. The proposed requirements for mandatory BMP's for indirect suppliers in voluntary BMP States should be avoided. The standard should not be more restrictive than State resource law and regulation.	•8.1 – Promote no change. The proposed requirements for mandatory BMP's for indirect suppliers in voluntary BMP States should be avoided. The standard should not be more restrictive than State resource law and regulation.
<p>Indicator: Program to supply regionally appropriate information or services to forest landowners, describing the importance and providing implementation guidance on BMPs; reforestation; visual quality management; and conservation of critical wildlife habitat elements, threatened and endangered species, and critically imperiled and imperiled species and communities.</p>	
Rationale for proposed change:	Proposed New Language:
Promote no change. The proposed requirements for mandatory BMP's for indirect suppliers in voluntary BMP States should be avoided. The standard should not be more restrictive than State resource law and regulation.	[No Comment]
see 8.1	Same as above
Add Master Logger Certification programs as indicator	[No Comment]
Need to expand forest land uses and create a skilled workforce to enhance compliance with BMP's etc.	e. afforestation f. policies and procedures to create incentives for afforestation, reforestation, and use of certified

	master loggers.
Concern over "invasive exotic species" and "special sites" has grown considerably since the SFIS was last revised. The landowner performance measures address both issues, and we recommend they should be covered in landowner education efforts.	[Name Omitted] recommends adding: e. invasive exotic species f. special sites Need to add definitions for both of these to the definition section.
Merely providing information or services to landowners does not ensure they are in fact practicing sustainable forestry equivalent to the SFI standard.	1. Procurement program based on a current list of landowners whose forests are certified by the SFI (for sources within the United States and Canada) or FSC (sources within or outside the United States and Canada).
Reforestation info/programs are becoming less available due to budget restrictions. Regional data is also becoming less detailed with the divestiture of industry lands. How can we show continual improvement in this area as the available resources/programs are being restricted? How can we define visual quality and be able to set standards across wide landscapes when the definition is so subjective?	[No Comment]
The major source of the wood and fiber supply comes from non-industrial private forestland (NIPF). Encouraging landowners and/or monetary support of NIPF participation in certification would better ensure that long-term sustainable management could be achieved on more land.	[No Comment]
The visual aspects of size, shape, and placement of clearcuts should apply on procurement lands as well.	a. same b. same c. size, shape, and placement of clearcuts and the visual impact of such harvest areas, d. same
Please use this space to propose any additional indicators for Performance Measure 8.1	
Add to the indicator list (information & guidance on): non-native invasive species; special sites (Obj. 6); and efficient utilization (Obj. 7)	
SFIS Objectives for Procurement Objective 8 could be added to the SFI product certification scheme (chain of custody) The ISO/IEC Guide 65 accredited certification body and or subcontracted inspection/testing body (ISO 17020) would be required to audit against the procurement and chain of custody requirements for use of the chain of custody mark.	
e. Certified Master Logger programs	
2. Encourage and support non-industrial private landowner participation in forest management certification programs such as the American Tree Farm System (ATFS) or FSC Small and Low Intensity Managed Forests (SLIMF) or participant landowner assistance programs.	
2. Program to monitor the results of communications efforts and incorporate results to improve procurement program activities.	

<p>Performance Measure 8.2. Program Participants shall encourage landowners to utilize the services of qualified resource professionals and qualified logging professionals in applying principles of sustainable forest management on their lands.</p>	
Rationale for proposed change:	Proposed New Language:
OK	
A certification scheme should have defined audit criteria. The word "encourage" is difficult to audit	
Same as above - to recognize Certified Master Logger programs	
[Name Omitted] recommends that SFI, Inc. promote the degree to which qualified logging professionals are utilized as a result of program participant efforts. SFI is built on a more collaborative approach that should recognize the success of nationwide education programs for qualified logging professionals.	
Delete it – no longer relevant after changes to Performance Measure 8.1.	
We need a better definition of qualified resource professionals. As a wood procurement professional I sometimes wonder why a procurement organization would need to be focuses on encouraging landowners to seek the services of "qualified" resource professionals when most procurement foresters are graduate foresters and could provide professional forestry advice during landowner discussions/meetings.	
8.2 Keep this measure substantively the same, as making it any more complex would unnecessarily add to landowner & operator costs without benefits to the resources. Abruptly changing this would erode relationships and programs that have been built and refined (at significant cost & effort) over the past decade to facilitate SFI objectives.	
<p>Indicators: Program to promote the use of qualified resource professionals and qualified logging professionals. List of qualified logging professionals maintained by Program Participant, state agency, loggers' association, or other organization.</p>	
Rationale for proposed change:	Proposed New Language:
OK	[No Comment]
SAF certified foresters should be included as a qualified resource professional, some of the State implementation committees are not recognizing Certified Foresters.	Indicators: 1 add after qualified resource professionals "including SAF-Certified foresters" 2. add after qualified logging professionals, "and qualified resource professionals including SAF-Certified Foresters"
Add Certified Master Loggers to indicator 2.	2. List of Certified Master Loggers and trained loggers maintained by Program Participant, state agency, loggers' association, or other organization.
3. Incentive program for landowners who use certified master loggers	[No Comment]
Delete it – no longer relevant after changes to Performance Measure 8.1.	[No Comment]
<p>Please use this space to propose any additional indicators for Performance Measure 8.2</p>	
<p>Rationale for proposed New Language: Professional fiber supply contractors and the public should have a right to know each Participant's logger training requirements. This is not clearly stated in the Standard. Proposed New Language: 3. Participant logger training requirements for professional loggers defined in contracts with direct suppliers</p>	

and made publicly available.	
<p>Performance Measure 8.3. Program Participants shall clearly define and implement policies to ensure that mill inventories and procurement activities do not compromise adherence to the principles of sustainable forestry.</p>	
Rationale for proposed change:	Proposed New Language:
OK	[No Comment]
The ISO/IEC Guide 65 accredited certification body can be required to audit/inspect mill inventories and procurement activities to ensure that activities do not compromise adherence to the principles of sustainable forestry.	The SFI product certification scheme can clearly define the audit criteria for 8.3
The principles of sustainable forestry must be specifically defined to ensure their credibility as being truly sustainable.	Program Participants shall clearly define and implement policies to ensure that mill inventories and procurement activities do not deviate from the SFI or FSC standards of sustainable forestry.
8.3 Keep this measure substantively the same, as making it any more complex would unnecessarily add to landowner & operator costs without benefits to the resources. Abruptly changing this would erode relationships and programs that have been built and refined (at significant cost & effort) over the past decade to facilitate SFI objectives.	[No Comment]
<p>Indicators: Program for the purchase of raw material from qualified logging professionals, wood producers, and other wood suppliers. Program to ensure that harvests of purchased stumpage comply with BMPs. Program to address adverse weather conditions.</p>	
Rationale for proposed change:	Proposed New Language:
OK	[No Comment]
As you are aware, many of the forest products Companies including [Name Omitted] here in Oregon are requiring compliance with SFI standards when purchasing logs by requiring the private forest owner be either certified under a certification program such as the American Tree Farm Program or require that they use an Oregon professional logger certified by the Association of Oregon Loggers. I believe that Certified Foresters under the Society of American Foresters should also be recognized by SFI as an acceptable source of raw materials from lands that are being managed on a sustainable basis and are using best management practices. In Oregon, the SFI Implementation Committee has not approved Certified Foresters as a acceptable source of logs. The SFI Implementation Committee in Oregon accepts loggers that have gone through a minimal amount of	Indicators: 1. add "SAF-certified foresters" after qualified logging professionals

<p>training yet professional foresters with college degrees and years of experience and which are certified Foresters under the SAF program are not acceptable as a reliable source of logs from well managed forestland. This makes no sense at all.</p>	
<p>These indicators can be included in the audit criteria that accredited product certification bodies must audit/inspect for conformance.</p>	<p>[No Comment]</p>
<p>Add Certified Master Logger to indicator 1.</p>	<p>1. Program for the purchase of raw material from Certified Master Loggers, trained logging professionals, wood producers, and other wood suppliers.</p>
<p>The principles of sustainable forestry mentioned in the objective need to include indicators that in fact apply to economic, environmental, and social components of SFM</p>	<p>4. Program to ensure social sustainability of Indigenous Peoples, the force workforce and forest dependent communities. through transparent policies, and equitable benefit sharing with all stakeholders.</p>
<p>The principles of sustainable forestry must be specifically defined to ensure their credibility as being truly sustainable.</p>	<p>1. Program for the purchase of raw material exclusively from forests certified by the SFI or FSC. 2. Program to ensure that harvests of purchased stumpage comply with the SFI or FSC standards. 3. Program to adequately address adverse weather conditions.</p>
<p>Although the state SIC's and/or Forestry Associations have been highly successful in developing logging training programs and have a high success in getting loggers to take the training (and the cont.ed. courses) - there are still areas around the US where loggers are refusing to take the training. given the dwindling logging capacity in some areas - How can a program participant strive for 100% purchasing from qualified logging professionals in a given wood basin if the logging contingent is not near the 100% trained threshold?</p>	<p>[No Comment]</p>
<p>In order for procurement activities not to negatively impact sustainability of their wood and fiber supply area, they must know what is happening to the resource and how they and others are impacting the sustainable removals.</p>	<p>[No Comment]</p>

Please use this space to propose any additional indicators for Performance Measure 8.3

Rationale for proposed New Language:
BMP compliance is a core part of the SFIS, and one of its biggest success stories. Though Participants should not be required to inspect every market tract, contracts should require compliance and participants have some type of process in place to deal with noncompliances. We cannot force a landowner to implement BMPs, but, if made a contract requirement, Participants can take action with the supplier, up to not accepting his wood.
Proposed New Language:
4. BMP compliance required in market/gatewood contracts

Rationale for proposed New Language:

According to the 1997 SFI National Forum Recommendation to **[Name Omitted]**, each Participant should have a clearly defined procurement policy or program. Though this basic requirement remains, the current wording of the Standard does not make it clear who this policy should be made available to, if anyone.

Proposed New Language:

5. Participant fiber procurement program publicly available and distributed to all applicable suppliers of fiber to Participant.

4. Program to monitor growth and drain data within the participant’s wood and fiber supply area.

3. Program to ensure that harvests of purchased stumpage do not come from sites associated with imperiled and vulnerable species and ecological communities.

Performance Measure 8.4. Program Participants shall monitor the effectiveness of efforts to promote reforestation and BMPs, using public or private sources of information.

Rationale for proposed change:

Economic viability

Proposed New Language:

Having a verifiable monitoring system to evaluate the results of promoting reforestation across a wood and fiber supply areas is problematic. There is not existing data which is readily available. All that we can practically look at is FIA data for reforestation and harvesting, which is often dated. Pulling the FIA and harvesting data is time consuming and costly in terms of that time. These costs and time do not create value and are not the best use of limited resources. Reforestation will occur unless the land is converted to a non forest use. There is not a way to “evaluate” the promotion of our efforts with regard to reforestation or to isolate our influence on reforestation rates as a result of our promotion efforts. Participants do not have the ability to effect the landowner’s decision to convert to a non forest use **[Name Omitted]** suggests removing language for evaluating the results of promoting reforestation.

Where a state has public laws which regulate BMP implementation and forestry practices, a BMP monitoring program by program participants should not be required. In such states, the consequence of not following BMPs is a legal matter and one handled by the State. There is little use in a program participant putting together a monitoring program where compliance is already required by state law and where monitoring by the state is also required by state law. This should be clarified in the standard.

OK	[No Comment]
Need to have forests to have forests reforested	8.4. Program Participants shall monitor the effectiveness of efforts to promote afforestation, retention of forests, reforestation and BMPs, using public or private sources of information.
"monitor effectiveness of efforts to promote" is poorly worded and difficult to carry out in an auditable way. Overlapping procurement areas make it impossible to measure individual impact.	Monitor public or private sources of information on BMP compliance and reforestation.
Cause-and-effect of promotional efforts and on-the-ground performance within an SFI participant's wood procurement area is difficult, if not impossible to establish.	PM 8.4 should be restated as follows, "Program Participants shall monitor reforestation and BMP performance using public or private sources of information."
Drop "efforts to promote". No measureable direct linkage between efforts to promote and implementation rates.	Program participants shall monitor the effectiveness of reforestation efforts and BMP compliance, using public information and reports where available.
Delete it – no longer relevant after changes to Performance Measure 8.1.	[No Comment]
Need a better definition of what qualifies for this performance measure	[No Comment]
Cause-and-effect of promotional efforts and on-the-ground performance within an SFI participant's wood procurement area is difficult, if not impossible to establish.	PM 8.4 should be restated as follows, "Program Participants shall monitor reforestation and BMP performance using public or private sources of information."
8.4 --- It makes sense to promote reforestation. However, do not require program participants to measure the effects of the promotion efforts. There is not a way to "evaluate" the efficacy of promotion efforts.	[No Comment]
(COLUMNS TEMPORARILY MERGED TO ACCOMMODATE LONG, SINGLE-COLUMN RESPONSE)	
<p>SUMMARY OF KEY FINDINGS ON [Name Omitted] PROJECTS RELATED TO SUSTAINABLE FORESTRY INITIATIVE PERFORMANCE MEASURE 8.4</p> <p>[Name Omitted] [Name Omitted]</p> <p>Over the past two years, [Name Omitted]. has been conducting three projects which are developing technical information related to Performance Measure 8.4. The three projects are: 1) a characterization of forestry Best Management Practices in U.S. states and Canadian provinces, 2) a survey of SFI participants describing approaches for implementing SFI Performance Measure 8.4, and 3) a characterization of public data related to reforestation. Below are key, preliminary findings from these three efforts which we submit for consideration by SFI as they begin revision of the SFI Standard. As soon as possible, [Name Omitted] will submit to SFI staff complete reports on each of these three projects.</p> <p>I.Characterization of Forestry Best Management Practices</p> <p>The purpose of this project is to characterize forestry Best Management Practices in U.S. states and Canadian provinces. Since adoption of the Clean Water Act in the United States and the Fisheries Act in Canada, forestry best management practices (BMPs) have been developed as the primary mechanism for achieving water quality protection from non-point source (NPS) pollutants that may result from forest</p>	

management. In the Southern United States, forestry BMPs are largely voluntary although states in the region have approved BMP prescriptions and have regulations that authorize protection of water quality. In other words, many states in the region have regulatory "backstops" of some kind (e.g., erosion and sedimentation laws) that can be used to stop "bad actors" when BMPs are not utilized. Forestry programs in the major timber-producing states in West, Northeast, and Midwest are overwhelmingly regulatory. States in these regions have developed extensive guidelines for implementation of forest practices rules (FPRs) related to water quality.

This is also the case in Canada where provincial governments have established a number of forest management and water quality related guidelines. Although there are jurisdictional differences in approaches to forestry NPS water quality protection, it is often difficult to characterize programs for individual jurisdictions as regulatory or non-regulatory because individual programs may contain elements of both types of approaches. For example, jurisdictions may have voluntary BMP implementation programs but may require notification of intent to harvest, submission of forest management or timber harvest plans, approval for the use of forest chemicals (i.e., pesticides), and/or permits for construction of watercourse crossings or harvesting near waterbodies.

While jurisdictions have taken different approaches to ensure BMP use, all have developed and published manuals or guidebooks that describe protocols, recommendations, or requirements for forest management. The breadth of information and complexity of the requirements or recommendations these publications contain can be quite large. For example, the manuals in some of the Western States and Canada Provinces are quite detailed with a multitude of prescriptive requirements and technical specifications for management in riparian forests, construction of roads, and installation of watercourse crossing structures. In the South, the BMP recommendations contained in state manuals are also comprehensive but less prescriptive and, therefore, less unwieldy. Even though jurisdictions have developed their own BMP programs there exists a great deal of consistency in recommendations, a phenomenon that is attributable to a common scientific understanding of forest water quality issues and control options. While the specifics may vary, several overarching BMP themes are evident in these jurisdictional publications: minimize soil exposure and compaction, separate soil and chemicals from surface waters, provide watercourses with a forested buffer, design stable roads, and install effective watercourse crossings.

All major timber-producing jurisdictions in the United States and Canada have conducted at least one BMP compliance or implementation survey. However, the protocols and periodicity of these monitoring programs is quite variable. Some states have well established statewide monitoring surveys conducted at regular intervals while other states conduct infrequent surveys. In Canada, all provinces have conducted some form of BMP monitoring to evaluate compliance with the various jurisdictional requirements. Monitoring or field audits can take the form of inspections by regulatory agencies or company self-inspections. Data obtained from these various monitoring surveys has provided valuable information which jurisdictions have used to continually improve implementation rates and, most importantly, identify problem areas where corrections are warranted. When problem areas are identified, the overwhelming response by the various regulatory agencies is to strengthen education and training programs in the specific area identified.

Overall, rates of BMP implementation or compliance are quite high. Comparing implementation rates among jurisdictions, however, can be difficult because sampling protocols are variable. This is further complicated by differences among jurisdictions in the types and level of timber harvesting, soils, topography, landownership patterns, and a host of other physical, biological, and socioeconomic factors. While overall implementation and compliance rates are quite high, monitoring surveys indicate that opportunities exist to enhance compliance with BMPs in three general areas: forest management within SMZs, forest road drainage, and stream crossings. For stream crossings, increased attention is warranted for culverts, particularly their sizing and installation. As a general trend, greater complexity in requirements or prescriptions for these three areas leads to greater potential for decreased compliance. This is particularly true for management within SMZs and to a lesser degree the installation of road water diversion techniques. It is also important to note that when jurisdictions observe "low" implementation or

compliance they also report very few instances of “gross neglect” and few “significant risks” to water quality. Many jurisdictions attribute their high implementation and compliance results to strong education and outreach programs and, more recently in North America, to sustainable forestry certification programs. Furthermore, compliance in jurisdictions with regulatory forestry programs (e.g., US West and Northeast as well as Canada) suggests that oversight by state and provincial government organizations is the foundation for BMP implementation.

In summary, major timber-producing jurisdictions have developed programs to ensure the implementation and effectiveness of forestry BMPs for protection of water resources, and these jurisdictions have regulations allowing them to address impairment of water quality. Both regulatory and non-regulatory approaches to forestry BMPs have been successful in controlling NPS pollution and enhancing water quality and include frequent evaluations to BMP prescriptions, revisions when necessary, and compliance or implementation monitoring. While one could argue that more frequent BMP monitoring may be warranted in some jurisdictions, it is important to remember that, today, forestry is often cited as a minor contributor to water quality impairment. Furthermore, resources available for NPS programs are generally limited and, as a result, NPS program managers are deciding to allocate resources to priorities other than monitoring forestry BMP implementation.

Evaluating jurisdictional forestry BMP programs has revealed the following key points:

(1) While forestry BMP prescriptions vary as a result of legal, political, and socioeconomic factors inherent to a specific jurisdiction all share common basic recommendations for protecting water resources.

(2) Regardless of jurisdictional requirements,

forestry BMPs are highly effective at protecting water resources when properly implemented.

(3) Even though jurisdictional monitoring programs and protocols vary, rates of BMP compliance are generally high. While opportunities for improvement are commonly cited by jurisdictions in areas related to stream crossings and forest roads, impacts to water quality are often characterized as minor and the duration of the impacts, temporary.

(4) Jurisdictions with long-term monitoring programs have reported steady and consistent improvement in BMP compliance rates over time.

(5) Education, outreach programs and forest certification have increased knowledge, use, and compliance with jurisdictional BMP recommendations and/or requirements.

II. Survey of Approaches for Implementation of SFI Performance Measure 8.4

The project surveyed SFI participants in order to characterize how they were implementing Performance Measure 8.4. As of July 31, 2008, thirty-seven of the 155 possible SFI participants that were sent surveys had responded.

Returned surveys presented data by individual mill, region of operation or company-wide. Some preliminary findings related to monitoring of reforestation and implementation of Best Management Practices in wood and fiber supply areas are as follows.

A. Monitoring Implementation of Best Management Practices

In almost all cases, trained loggers are being used to supply wood for mills. Generally, in areas with forest practices legislation, the emphasis is on the property rather than logging programs. Thus, use of trained loggers is generally lower in areas where specific regulations exist.

Most respondents to the survey have signed agreements with wood suppliers that BMPs will be implemented with harvesting operations and that they will use trained loggers. Most companies spot-check on logger performance to identify issues related to non-compliance, and most have implemented procedures to address situations where improvement is warranted.

All companies report a relatively high rate (e.g., 80%) of BMP compliance within their working areas. Data related to compliance are collected and/or monitored by a wide variety of means: company personnel, contract consultants, wood supplier agreements, government agencies, etc. with differing protocols and reporting systems. When harvested sites are monitored by company personnel, usually some subsample is used (e.g., a 5% sample).

There is an increasing reliance on government agency staff and databases, even in areas that do not have forest practice regulations to provide assurance that BMPs have been implemented. Agencies are under increasing pressures to assure the public of environmental safeguards. Thus, they are visiting many harvesting sites to evaluate BMP implementation thereby serving as a second or third party validation.

B. Monitoring Reforestation

Most survey recipients do not directly monitor reforestation in wood and fiber supply areas unless required by law or unless harvest is on company-owned or company-controlled property. Rather, most use some type of database, usually information provided by state forestry or natural resource agencies or the USDA Forest Inventory and Analysis program, to develop an indirect estimate of reforested acreage from measures such as seedlings produced or planted. Some state agencies estimate seedlings produced or sold (and use this to estimate acres reforested) on a statewide basis with each state having a different procedure for developing their estimate. Because most wood and fiber supply areas for respondents are multi-state, they are forced to use data from different states that are collected differently thereby adding uncertainty to indirect estimates of reforested acres.

III. Characterization of Public Data Related to Reforestation

The purpose of this project is to provide an overview of public reforestation data including its spatial scale (e.g., county, state) that might be used to report on reforestation at the scale of a wood and fiber supply area. To gather information for this report, we searched websites of federal and state agencies and personally communicated with USDA Forest Service regional regeneration specialists, staff with state forestry agencies, and nursery cooperative representatives. We did not survey state agencies in seven states where forest area and commercial forestry is limited.

Twenty-seven of the 43 state forestry agencies we surveyed collect and make available data related to reforestation. However, each state agency gathers a unique set of reforestation data using methods that it undoubtedly finds appropriate for its objectives and constraints (e.g., available funding, desired information, available staff time, forest types). In four states, data are available or reported to the county level and may be used for estimating reforestation effort within wood and fiber supply areas. However, in most states with reforestation data, the data itself are made available or summaries are reported only at the state scale or only for selected ownerships.

Variability among states in methodology also complicates efforts to use state agency data in wood and fiber supply areas that include multiple jurisdictions.

One tree nursery cooperative in the Southeast develops and distributes to its members estimates of seedlings produced by state. The data underlying these estimates are collected in a consistent manner across all states and years. However, nurseries surveyed by the cooperative do not know where their seedlings are ultimately planted or for what purpose (e.g., reforestation following timber harvest,

afforestation, conservation purposes). The cooperative also does not survey smaller nurseries and may not fully adjust for seedlings purchased in one state but planted in another. Furthermore, area planted must be estimated from seedlings produced via an indirect manner (i.e., using an assumed planting density based on seedlings produced which may differ from seedlings actually planted). Even if number of seedlings planted is known, that metric will be most useful if interpreted with some understanding of forest structure or area harvested within the area of interest.

Several types of information about reforestation are available through federal agencies. Federal cost-share programs administered by the USDA report acres planted, often by species and county. However, not all non-industrial private landowners receive federal funding. Therefore, this information does not fully characterize reforestation efforts. The Intertribal Timber Council, which is made up of representatives from all regions of the country, maintains a web site that includes a list of annual reports submitted by the Bureau of Indian Affairs to Congress that describes, by region and reservation, acres of timber offered for sale, harvested, reforested, and in need of regeneration. Two publications available through the USDA Forest Service provide some data related to reforestation trends. Tree Planter's Notes provides technical and research information related to nursery production and outplanting of trees, shrubs, and native plants. Since 1997, publication has been irregular. Tree Planting in the United States was published annually by the USDA Forest Service from 1955 until 1995 covering all 50 states. In addition to acres planted, it also discusses nursery production, direct seeding and timber stand improvement. Although no longer published, this report may be used to show trends or have other historical value.

Finally, of all available datasets reviewed, seedling data available through the USDA Forest Service's Forest Inventory and Analysis program offers the greatest promise for estimating reforestation at the scale of wood and fiber supply areas. Although methods have changed somewhat over time, FIA data are collected using a rigorous methodology that is consistent across jurisdictions. FIA plots cover all forested land in the U.S., are distributed uniformly based on a national grid cell, a portion of plots are sampled each year, and the data are available for public use via the internet. However,

the currency of FIA data varies among states with the most recently available data for each state typically being 1–2 years old and the oldest data ranging from 6–8 years old. The computer program GForest, available through the National Council for Air and Stream Improvement, Inc., offers a simple method for reporting on seedlings per acre within user-defined geographic areas of interest (i.e., circles, counties, states) that can approximate wood and fiber supply areas. Because of limitations described above in the currency of FIA data, GForest reforestation reports provide limited information about what happened over the past 1–2 years, but provide a sound basis for inferences about the past 3–5 years. However, to fully support inferences about reforestation success, analyses of FIA data would need to be confined to plots where landowners had recently harvested timber and attempted natural or artificial regeneration.

Participants in sustainable forestry certification programs also are sometimes asked to evaluate results of their efforts to promote reforestation across wood and fiber supply areas. While FIA data are useful for documenting trends in reforestation, particularly during the past 3–5 years, none of the public data sources we identified provide information that would help a company or organization understand its relative influence on reforestation efforts. For example, in addition to the limitations of the datasets mentioned above, none of the databases report reforestation information at the landowner scale and none include information resulting from interviews with landowners asking how the landowner learned about the benefits of reforestation, what motivated them to reforest, or other related questions. Furthermore, multiple agencies and organizations often engage in efforts to inform landowners about benefits of reforestation. Without interviews with individual landowners, it would be impossible to understand the relative influence of multiple organizations.

Thus, we are unaware of any methods that could be used with existing databases to link education/promotion efforts by a single entity with actual reforestation within a wood and fiber basket.

(End: Columns TEMPORARILY MERGED TO ACCOMMODATE LONG, SINGLE-COLUMN RESPONSE)	
Afforestation may be a component in improving the practice of sustainable forestry.	Program Participants shall monitor the effectiveness of efforts to promote reforestation, afforestation, and BMPs, using public or private sources of information.
8.4 Requirement to monitor/evaluate effectiveness of promotion programs is bureaucratic make-work, having little to no benefit for the cost. Furthermore, such efforts are nearly impossible to yield meaningful insights. There are no control means to compare or measure the efficacy of promotions.	8.4 Revise to eliminate requirement to evaluate effectiveness of promotion programs concerning reforestation, BMPs by wood suppliers, BMPs generally.
Promote reforestation, but do not require program participants to measure the effects of the promotion efforts. There is not a way to effectively and accurately "evaluate" the promotion of efforts with regard to reforestation as there is no readily available data. Where a state has public laws that regulate BMP implementation and forestry practices, a BMP monitoring program by program participants should not be required.	Drop the requirement for reforestation monitoring.
•8.4.1 – Drop the requirement for reforestation monitoring.	•8.4.1 – Drop the requirement for reforestation monitoring.
<p>Indicators: A verifiable monitoring system to evaluate the results of promoting reforestation across the wood and fiber supply area; monitor the use of BMPs by wood producers supplying the Program Participant; and evaluate the results of promotion and use of BMPs across the wood and fiber supply area. Use of information from the verifiable monitoring system to set goals to improve, over time, rates of BMP compliance.</p>	
Rationale for proposed change:	Proposed New Language:
Drop the requirement for reforestation monitoring.	[No Comment]
Rates of compliance are extremely high (upper 90s%), but effectiveness of certain practices (i.e. stream crossings and approaches) have been documented to be the "problem areas" in most states. Also if BMPs become a "mandatory" requirement in the SFIS, goals to improve compliance over time becomes inappropriate language for a mandatory measure. All BMP indicators (regarding monitoring) fit best in Obj. 11 if and when BMPs are a mandatory element, then BMPs are a "commitment to comply with applicable regulations".	replace "rates of EMP compliance" with, effectiveness of BMP implementation.
OK	[No Comment]
Improve sustainable harvesting practices, including BMP implementation by utilizing Certified Master Loggers from credible Master Logger Certification programs.	[No Comment]

<p>Need to monitor how program participants are promoting and conserving forest land and what role they are playing in promoting conversion of forest land to non forest land use</p>	<p>d. report gain and loss of land in forest use by program participant</p>
<p>1. Results of "promoting" and "promotion" are not measurable. 2. Improving high (98%) BMP compliance rates is a worthy goal but highly unlikely.</p>	<p>1a Monitor Reforestation... b Monitor BMP Compliance... c Evaluate need for increased promotion of reforestation and BMPs... 2. ...set goals to maintain high rates of BMP compliance.</p>
<p>See above.</p>	<p>Indicator 8.4.1 should be restated as follows: 1. A verifiable system to a. monitor reforestation across the wood and fiber supply area; b. monitor the use of BMPs by wood producers supplying the Program Participant; and c. evaluate the need for promotion of reforestation and BMPs across the wood and fiber supply area</p>
<p>Drop "efforts to promote". No measureable direct linkage between efforts to promote and implementation rates.</p>	<p>1. A verifiable monitoring system to a. evaluate reforestation across the wood and fiber supply area; b. monitor the use of BMPs by wood producers supplying the Program Participant; and c. compliance with BMPs across the wood and fiber supply area.</p>
<p>Indicator 1a is currently difficult to comply with. It is not difficult for purchases from suppliers who have tenure on Crown land (via TFL, FL, or BCTS). However, when purchasing from a private landowner, are we expected to follow-up 2 years following the purchase to see if they reforested. I do not believe that is a reasonable expectation.</p>	<p>I would add language in the guidance document to suggest how this evaluation is to occur.</p>
<p>Delete it – no longer relevant after changes to Performance Measure 8.1.</p>	<p>[No Comment]</p>
<p>Need a btter definition for item c. above</p>	<p>[No Comment]</p>
<p>Cause-and-affect of promotional efforts and on-the-ground performance within an SFI participant's wood procurement area is difficult, if not impossible to establish.</p>	<p>Indicator 1 should be restated as follows: 1. A verifiable system to a. monitor reforestation across the wood and fiber supply area; b. monitor the use of BMPs by wood producers supplying the Program Participant; and c. evaluate the need for promotion of reforestation and BMPs across the wood and fiber supply area</p>

	<p>Indicator 8.4.2 should be restated as follows:</p> <p>2. Use of information from the verifiable monitoring system to set goals to improve or maintain, over time, the rates of BMP compliance.</p>
<p>1.a – Reforestation as an issue is important, but requiring every Participant to individually evaluate the results of promoting reforestation is inefficient, redundant, and of limited value as written.</p> <p>1.c - Requiring every Participant to evaluate the results of promoting BMPs in its fiber supply basin(s) is inefficient and redundant. Also, this Indicator, as written, infers that each company has a measurable impact on ALL harvesting, not just on tracts from which it receives fiber. This is not true.</p> <p>2 – Thanks in large part to the SFIS, BMP compliance is very high. On the other hand, though remaining high, it can vary significantly from year-to-year due to numerous factors. Setting a continuous improvement goal as written is unrealistic.</p>	<p>1.a – Two proposed solutions 1) eliminate Indicator, or 2) move it to Objective 12.1 and make it a requirement for state SICs instead of each Participant.</p> <p>1.c – Delete 1.c and incorporate into 2 below.</p> <p>2 - Use of information from the verifiable monitoring system to assist Participant and its wood suppliers in maintaining BMP compliance and to identify potential areas for improved performance.</p>
<p>Please use this space to propose any additional indicators for Performance Measure 8.4</p>	
<p>d. evaluate the results of promoting the use of Certified Master Loggers across the wood and fiber supply areas.</p>	
<p style="text-align: center;"><i>Procurement by manufacturing facilities enrolled in the SFI Program from sources outside the United States and Canada (8.5 and 8.6 apply)</i></p>	
<p>Performance Measure 8.5 Program Participants shall ensure that their procurement programs support the principles of sustainable forestry, including efforts to thwart illegal logging and promote conservation of biological diversity.</p>	
<p>Rationale for proposed change:</p>	<p>Proposed New Language:</p>
<p>OK</p>	<p>[No Comment]</p>
<p>Once again need to capture all aspects of SFM.</p>	<p>8.5 Program Participants shall ensure that their procurement programs support the principles of sustainable forestry, including efforts to stop illegal logging, promote conservation of biological diversity, protect cultural sites, and promote social sustainability</p>
<p>Delete it – no longer relevant after changes to Performance Measure 8.1.</p>	<p>[No Comment]</p>
<p>move away from the wording for United States and Canada , let the standard be for low vs high risk areas based on assements by the participating company</p>	<p>[No Comment]</p>

Indicators: Process to assess the risk that the Program Participant’s procurement program could acquire material from illegal logging. This process may include relying on the adequacy of legal protections in the United States and Canada, where laws against domestic illegal logging are enforced. Program to address any significant risk identified under 8.5.1. Procurement from areas outside the United States and Canada promotes conservation of biodiversity hotspots and major tropical wilderness areas. Program with direct suppliers to promote the principles of sustainable forestry. Knowledge about direct suppliers’ application of the principles of sustainable forestry.

Rationale for proposed change:	Proposed New Language:
OK	[No Comment]
# 5 is too weak	#5 - change to “Documented information indicating direct...”
Delete second sentence in 1. as legal protections are not unique to North America. All PP's must assess the risk for all aspects of SFM	1. Process to assess the risk that the Program Participant’s procurement program could acquire material from illegal logging. 6. Process to assess the risk that PP's procurement program could acquire material from locations where the ILO labor standards are not applied, cultural sites have been degraded, where land claim disputes with IP's do not have a conflict resolution process
Delete it – no longer relevant after changes to Performance Measure 8.1.	[No Comment]
Need a more in-depth statement for #5 indicator	[No Comment]
Need to better integrate legality into procurement programs and activities.	4.Program with suppliers to promote the principles of sustainable forestry and require legal wood.
go global, move away from the emphasis on United States and Canada, the standards should be applicable anywhere in the world, should there be a risk assessment approach, ie, the risk in United states and canada are low	[No Comment]

Please use this space to propose any additional indicators for Performance Measure 8.5

1.Written policy that ensures that material outside the United States and Canada does not come from areas that have been logged illegally.

Performance Measure 8.6. Program Participants shall encourage economically, environmentally, and socially sound practices.

Rationale for proposed change:	Proposed New Language:
OK	[No Comment]
The SFI certification scheme for procurement and chain of custody can require that the ANSI accredited certification body audit the below indicators for countries without effective laws to	[No Comment]

meet the requirements of 8.6	
SFI can give the ANSI accredited certification body a checklist to use when auditing suppliers in countries without such laws	
Delete it – no longer relevant after changes to Performance Measure 8.1.	[No Comment]
This performance measure and its indicators should be promoted to an objective that applies to all SFI audits, including land management reviews.	[No Comment]
<p>Indicator: Process to assess the risk that the Program Participant’s procurement takes place in countries without effective laws addressing the following: workers’ health and safety; fair labor practices; indigenous peoples’ rights; antidiscrimination and antiharassment measures; prevailing wages; and workers’ right to organize. This process may include relying on the adequacy of legal protections in countries, such as exist in the United States and Canada, where laws are effective because they are in place, are enforced for wood and fiber originating in those countries, and independent legal processes are available in the case of disputes. Program to address any significant risk identified under 8.6.1.</p>	
Rationale for proposed change:	Proposed New Language:
Strengthening language could give more credibility to Procurement standard, change encourage to implement.	Program Participants shall implement economically, environmentally, and socially sound practices.
OK	[No Comment]
Section 8.6 includes environmentally sound practices but almost all indicators are social. Process should assess risk using indicators under objectives 1-7 as they relate to wildlife, habitat, water quality and maintenance of productivity, biodiversity.	[No Comment]
Indicator inadequate to comply with ILO core labor standards and thus falls below the minimum standard for social sustainability. Existing laws in North America do not comply with ILO core labor standards.	f. workers' right to bargain as set forth in ILO conventions g. workers freedom of association as set forth in ILO Conventions h. ensuring that IP's have a dispute resolution process based on informed consent delete all that follows
Delete it – no longer relevant after changes to Performance Measure 8.1.	[No Comment]
<p>Please use this space to propose any additional indicators for Performance Measure 8.6</p>	
<p>Add new indicators: 3. Process to assess the risk that the Program Participant’s procurement takes place in countries without effective environmental laws addressing: a. biodiversity b. habitat conservation c. water quality</p>	

d. maintenance of productivity

4. Program to address any significant risk identified under 8.6.2 and encouragement to adopt BMPs as they relate to same.

Include recommendations from ILO sub committee upon its completion

Please use this space to propose any additional Performance Measures and Associated Indicators for Objective 8

The proposed language and recommended AZE methodology does not clearly define boundaries of priority sites. Imperiled species tend to occupy only some portions of a site, so vague boundaries will lead to difficulties in implementing the proposed Performance Measure.

3. An extensive amount of effort has already been spent in the United States addressing conservation of priority sites, and protection of endangered habitats. For example,

a. The recently released NCASI study, "A Summary of Conservation Planning for Primary Forest Industry in the US," summarizes national, regional, and state conservation initiatives already in place.

b. The United States and Canada already have laws in place to protect threatened and endangered species.

c. State Natural Heritage Programs provide scientific information regarding the existence of imperiled and critically imperiled species habitat and recommended management activities to promote conservation of such. SFI program participants are actively using this information in outreach to landowners.

4. Program Participants with procurement operations do not have direct ability to "promote legal protection, such as permanent easements" as the proposed language suggests. It is unclear how this expectation could be met and why the Alliance for Zero Extinction (AZE) is specifically mentioned.

[Name Omitted] supports the addition of a performance measure to address the protection of places of cultural heritage value, i.e. cemeteries

Change: Add performance measure 8.7;

Performance Measure 8.7 Program participants shall encourage the development an optional program that offers independent third-party audits of logging operations. Fiber sourced from an SFI recognized independent third-party logger certification program is considered to be from an independently third-party certified source.

Indicators:

1. Standard shall be consistent with SFI standard and state or provincial BMPs.

2. Standard shall include specific and measurable practices or indicators that address:

a. Protection of water quality and soils

b. Management of visual quality

c. Conformance with acceptable silvicultural, operational and utilization standards

d. Compliance with government regulations applicable to logging operations.

e. Adherence to site specific harvest and/or management plans. The type of plan required is dependent on the amount of contiguous forest land acres within a single ownership parcel.

i. Harvest plan required for properties less than 100 contiguous acres

ii. Harvest plan and management plan are required for properties with 100-499 acres

iii. Properties of more than 500 contiguous acres land shall be certified

- f. Sound business management and practices
- i. Timber sale contracts shall be in writing and signed by both the logger and the landowner
- g. Continuing education requirements
- h. Continuous improvement of the certification program and participants
- 3. Logger certification field auditors shall be required to have:
 - a. Four year degree in forestry from an accredited education institution.
- 4. Logger certification auditor training:
 - a. Auditors shall be required to complete training by a SFI APQ approved auditor.
- 5. Program or standard shall provide an acceptable statistically valid methodology for conducting random audits of participants.
- 6. Development of logger certification program should be transparent and include input from the broad forest community.
- 7. Program oversight shall be provided by an independent board of directors representing the broad forest community.
- 8. Method to track the purchase and final delivery of wood.

Rationale

A logger certification/SFI relationship would underscore SFI's leadership role in advancing sustainable forest management on family forests and help address the challenge of certifying the fiber harvested from family forestlands.

Often, the only forest management advice a family forest owner receives is from a logger who approaches the landowner to procure wood. While many loggers are very experienced and have a professional approach to wood procurement, the Minnesota Logger Education Program (MLEP) believes that a well-trained and experienced logger with a broader vision of forestry can provide family forest landowners with sustainable forest management information. Logger certification adds independent credibility to this opportunity and certified timber to the marketplace.

A logger certification/SFI relationship is important to the vitality of the forest products industry, their customers and the continued success of the SFI program. As you know, logger certification is increasingly being discussed by large paper consumers, industry, land management organizations, private landowners, environmentalist and loggers.

A 2005 study, "Developing a Certification Framework for Minnesota's Family Forests", conducted by Dr. Michael Kilgore of the University of Minnesota confirms there is little interest from family forest landowners to certify their land. Only 4% of family forest landowners surveyed stated they were very likely to have their forest land certified. The relatively large number of those landowners and associated turnover rate of family forest lands, combined with their low level of interest in certification, make them an unlikely primary target for certification efforts.

On the other hand, support for logger certification within the logging community is impressively high. In Minnesota, nearly three-fourths indicated they were somewhat to very likely to certify their logging business if a logger certification program was established.

The Kilgore study provides compelling justification for the need and role of logger certification in providing third-party certified resource from family forests.

Minnesota has approximately 15 million acres of timberland. Of that total, 37% is controlled by family forest landowners and these family forests provide an estimated 45% of the timber harvested each year. This presents a significant challenge to the forest products industry. For example, Time Inc. has asked several mills in Minnesota and across the country to meet a target that 80% of the resource going into their product be certified.

Establishing recognition between the SFI program and a logger certification program would provide a

unique opportunity to underscore SFI's leadership role in advancing sustainable forest management on family forests. We strongly encourage you to consider reflecting this in the new standard

Rationale: Accepted master logger programs should count as a certified source of timber, should meet COC requirements.

(ADD) Performance Measure 8.7 Program participants shall encourage the development an optional program that offers independent third-party audits of logging operations.

Indicators:

1. Standard shall be consistent with SFI standard and state or provincial BMPs.
2. Standard shall include specific and measurable practices or indicators that address:
 - a. Protection of water quality and soils
 - b. Management of visual quality
 - c. Conformance with acceptable silvicultural, operational and utilization standards
 - d. Compliance with government regulations applicable to logging operations.
 - e. Adherence to site specific harvest and management plans
 - i. Harvest plan required for properties less than 100 contiguous acres
 - ii. Harvest plan and management plan are required for properties with 100-499 acres
 - iii. Properties of more than 500 contiguous acres land shall be certified
 - f. Sound business management and practices
 - i. Timber sale contracts shall be in writing and signed by both the logger and the landowner
 - g. Continuing education requirements
 - h. Continuous improvement of the certification program and participants
3. Logger certification field auditors shall be required to have:
 - a. Four year degree in forestry from an accredited education institution.
4. Logger certification auditor training:
 - a. Auditors shall be required to complete training by a SFI APQ approved auditor.
5. Program or standard shall provide an acceptable statistically valid methodology for conducting random audits of participants.
6. Development of logger certification program should be transparent and include input from the broad forest community.
7. Program oversight shall be provided by an independent board of directors representing the broad forest community.
8. Method to track the purchase and final delivery of wood.

DEFINITIONS: (additions to the definitions in the standard)

Harvest plan -The harvest plan is a written document that addresses landowner objectives and reflects the requirements in the logger certification program standard. The harvest plan should include a sale map identifying the cutting area, cutting specifications and pertinent operational requirements and restrictions.

In addition, the harvest plan should specifically address: regeneration, water quality, riparian, wildlife, endangered and threatened species and OSHA requirements.

Management plan - a detailed plan developed by a professional forester for a landowner which provides long range planning for the property, addresses landowner objectives, soil types, water & visual quality, wildlife, forest health, riparian areas and endangered and threatened species.

In Objective 8 I would suggest adding a performance measure 8.7 as follows: Program participants shall encourage the development of an optional program that offers independent third-party audits of logging operations. Fiber sourced from an SFI recognized independent third-party certification program is considered to be from an independent third-party certified source.

Indicators:

1. Standard shall be consistent with SFI standard and state or provincial BMPs.
2. Standard shall include specific and measurable practices or indicators that address:
 - a. Protection of water quality and soils
 - b. Management of visual quality
 - c. Conformance with acceptable silvicultural, operational and utilization standards
 - d. Compliance with government regulations applicable to logging operations
 - e. Adherence to site specific harvest and management plans
 - i. Harvest plan required for properties less than 100 forested acres
 - ii. Harvest plan and management plan are required for properties with 100 to 499 forested acres
 - iii. Properties of more than 500 contiguous acres of forest land shall be certified
 - f. Sound business management and practices
 - i. Timber sale contracts shall be in writing and signed by both the logger and the landowner
 - g. Continuing education requirements
 - h. Continuous improvement of the certification program and participants;
3. Logger certification field auditors shall be required to have
 - a. Four year degree in forestry from an accredited education institution, or
 - b. Be a certified logger with at least 10 years practical experience and who works as a team with a forester in conducting field audits;
4. Logger certification auditor training:
 - a. Auditors shall be required to complete training by approved auditor
5. Program or standard shall provide an acceptable statistically valid methodology for conducting random audits of participants
6. Development of logger certification program should be transparent and include input from the broad forest community
7. Program oversight shall be provided by an independent board of directors representing the broad forest community

8. Method to track the purchase and final delivery of wood.

SFIS OBJECTIVE FOR FORESTRY RESEARCH, SCIENCE, AND TECHNOLOGY

Objective 9. To improve forestry research, science, and technology, upon which sound forest management decisions are based.

Rationale for proposed change:	Proposed New Language:
This objective is passe and totally oriented to the industrial owner origin of the standard.	[No Comment]
OK	[No Comment]
"Sound" forest management decisions are too subjective; the goal is sustainability.	To improve forestry research, science, and technology, upon which sustainable forest management decisions are based.

Performance Measure 9.1 Program Participants shall individually, through cooperative efforts, or through associations provide in-kind support or funding, in addition to that generated through taxes, for forest research to improve the health, productivity, and management of forest resources.

Rationale for proposed change:	Proposed New Language:
This PM is burdensome to the nonindustrial participant and could be a contributing factor limiting the growth of SFIS to family forest landowners.	[No Comment]
OK	[No Comment]
Some States have very effective research programs funded by harvest tax dollars. Drop "in addition to that generated through taxes."	Program participants shall individually, through cooperative efforts, or through associations provide in-kind support or funding, for forest research to improve the health, productivity, and management of forest resources.
Again, the goal is sustainability.	Program Participants shall individually, through cooperative efforts, or through associations provide in-kind support or funding, in addition to that generated through taxes, for forest research to improve the health, productivity, and sustainable management of forest resources.
Need a more detailed statement for performance measure 9.1. How much can a company afford to spend on research when the business climate is so poor? What is the true \$\$\$ measuring stick for company "A" given its scope of operations? Can SFI, Inc set up a proposed scale based on green tons consumed? How much "in-kind" support can be substituted for actual research \$\$\$?	[No Comment]

<p>Indicator: Current financial or in-kind support of research to address questions of relevance in the region of operations. The research will include some or all of the following issues: forest health, productivity, and ecosystem functions; chemical efficiency, use rate, and integrated pest management; water quality; wildlife management at stand or landscape levels; conservation of biological diversity; and effectiveness of BMPs.</p>	
Rationale for proposed change:	Proposed New Language:
OK	[No Comment]
Few managed wildlife species are 'stand-level' and this terminology excludes aquatic environments.	Remove "or" and replace with "and" in 9.1.1 d. to read: "management at stand and landscape levels" Add "air" and "aquatic, wetland and riparian habitats to 9.1.1 c. to read: "water and air quality, aquatic, wetland and riparian habitats;" [SG/DW]
Need to research all aspects of SFM	g. levels of stakeholder benefit sharing
Rationale: recognition of biomass interests and role forests can play in meeting green energy needs.	[No Comment]
<ul style="list-style-type: none"> • "Investigate" is more appropriate than "address" in terms of research. • These issues should be researched if current, applicable science is not available. • The detrimental effects of any chemical use or integrated pest management must be monitored and ameliorated to be sustainable. • The effect of forest practices on water quality is really the question of interest. • BMPs should be considered effective only if they result in sustainable forests. 	<p>1. Current financial or in-kind support of research to investigate questions of relevance in the region of operations. The research should include some or all of the following issues, depending on the extent and applicability of the best scientific information available:</p> <ul style="list-style-type: none"> a. forest health, productivity, and ecosystem functions; b. effectiveness, beneficial effects, and detrimental effects of integrated pest management and any chemical use; c. effects of forest practices on water quality; d. wildlife management at stand or landscape levels; e. conservation of biological diversity; and f. effectiveness of BMPs at achieving sustainable forests.
We have the same "stand-level" concerns that we described for Objective #4.	Drop the "stand-level" language.
<p>Please use this space to propose any additional indicators for Performance Measure 9.1</p>	
<p>Performance Measure 9.2. Program Participants shall individually, through cooperative efforts, or through associations develop or use state, provincial, or regional analyses in support of their sustainable forestry programs.</p>	
Rationale for proposed change:	Proposed New Language:
Drop regeneration assessments.	[No Comment]
Not value added.	remove performance measure
OK	[No Comment]

broaden scope	add the wording "in the country in which the participant is conducting business."
<p>Indicator: Participation, individually or through cooperative efforts or associations at the state, provincial, or regional level, in the development or use of regeneration assessments; growth-and-drain assessments; BMP implementation and compliance; and biodiversity conservation information for family forest owners.</p>	
Rationale for proposed change:	Proposed New Language:
OK	[No Comment]
Should add national and local – these are relevant too	Change to “national, state, provincial, regional, or local level”
Need to have indicators that cover all aspects of SFM	e. social, cultural, and economic benefit assessments
Clarify that SIC's are part of the cooperative efforts under this indicator.	<p>Add: of SIC's</p> <p>1. Participation, individually or through cooperative efforts of SIC's or associations at the state, provincial, or regional level, in the development or use of</p> <ul style="list-style-type: none"> a. regeneration assessments; b. growth-and-drain assessments; c. BMP implementation and compliance; and d. biodiversity conservation information for family forest owners
Regeneration rates are in the 98% plus range in regulated states, therefore agencies have stopped or drastically reduced monitoring programs to save money.	a. regeneration assessments where public information is available.
Indicator 9.2.1a, b, & d: Suggest removing these three sub-indicators or transferring them to Objective 8. Regional analyses of regeneration, growth & drain assessments, and any information for family forest owners are of little or no operational value to landowner operations, and similar within-ownership information is captured in Objectives 1, 2 and 4. Further, "participation in the development or use" of these analyses may not be available in all regions and, in many cases, involves chasing down frequently out-of-date examples of these analyses. These may be important analyses for procurement operations but it is unfair to expect landowners to address these as well.	Indicator 9.2.1a, b, & d: Suggest removing these three sub-indicators or transferring them to Objective 8.
The definitions of biodiversity are so wide-ranging and in many cases so contentious that this is not a wise inclusion. People from many different disciplines claim special knowledge of this field, making conflicting recommendations, often including a single tree selection harvest which makes a woodlot economically useless.	OMIT: indicator 1(d)
Delete Indicator 9.2.1a which requires participation	Delete 9.2.1a

in the development or use of regeneration assessments since regeneration in the US is no longer a significant issue and many States have abandoned development of regional assessments.	
•9.2.1 – Drop regeneration assessments.	•9.2.1 – Drop regeneration assessments.
Please use this space to propose any additional indicators for Performance Measure 9.2	
Please use this space to propose any additional Performance Measures and Associated Indicators for Objective 9	

SFIS OBJECTIVE FOR TRAINING AND EDUCATION

Objective 10. To improve the practice of sustainable forest management by resource professionals, logging professionals, and contractors through appropriate training and education programs.

Rationale for proposed change:	Proposed New Language:
OK as is	N/A
OK	[No Comment]
	Add consultants after "logging professionals"
To improve the practice of sustainable forest management is good, but to ensure it is necessary to achieve it.	To ensure the practice of sustainable forest management by resource professionals, logging professionals, and contractors through appropriate training and education programs.
Obj.10 "Contractors" is inconsistent language not defined in definitions section.	Obj.10 ...logging professionals, and wood producers through...

Performance Measure 10.1. Program Participants shall require appropriate training of personnel and contractors so that they are competent to fulfill their responsibilities under the SFI Standard.

Rationale for proposed change:	Proposed New Language:
OK as is	N/A
OK	[No Comment]
Financial and in-kind support for professional certification and training for technicians and inventory/resource planners should be added to 10.1 or 10.2.	Add consultants after "personnel"
Again - some logging contractors refuse to take the training in some regional areas. Is there another delivery method that could be considered (i.e. actual logging job site training)?	[No Comment]
10.1 "Contractors" is inconsistent language not defined in definitions section.	10.1 Change "contractors" to wood producers.

Performance Measure 10.1. Program Participants shall require appropriate training of personnel and contractors so that they are competent to fulfill their responsibilities under the SFI Standard.

Rationale for proposed change:	Proposed New Language:
OK	[No Comment]
#3 and 4 - Might need an auditable record of these activities	#3 – add "to include documentation that such activities have taken place" to end #4 – change to "Consultant and contractor education and training sufficient to their roles and responsibilities, to include documentation that such activities have taken place."
Inadequate to obtain the objective	5. preference given to contractors who exceed required training such as the master logger certification program
• Achieving the SFI Standard Objectives alone is insufficient due to the lack of specificity in their language	1. Written statement of commitment to the SFI Standard communicated throughout the organization, particularly to mill and woodland

SFIS OBJECTIVE FOR LEGAL AND REGULATORY COMPLIANCE

Objective 11. Commitment to comply with applicable federal, provincial, state, or local laws and regulations.

Rationale for proposed change:	Proposed New Language:
none	
Enhance credibility of the Standard	[Name Omitted] agrees with the current standard. We would only suggest that the commitment to legal wood with a positive on how this is a fact of life in the United States should be explored... and should be made more prominent in the SFI standard. The United States is recognized a country with good governance and being at low risk for harvest of illegal wood.
OK	
To ensure that the wording is parallel with that of the other objectives. Also, having a "commitment" as an objective sounds weak.	To comply with applicable federal, provincial, state, or local laws and regulations.
<ul style="list-style-type: none"> • A "commitment" to comply with laws does not ensure actual compliance. • There is too much discretion allowed in deciding which laws are "applicable" or not. • International treaties and accords, statutes, and associated standards must also be upheld. 	To comply with all international treaties and accords, and federal, provincial, state, and local laws, statutes, regulations, and associated standards.
more global	add the wording "in the countries in which the program participant operates"

Performance Measure 11.1. Program Participants shall take appropriate steps to comply with applicable federal, provincial, state, and local forestry and related environmental laws and regulations.

Rationale for proposed change:	Proposed New Language:
OK	
Remove unnecessary words.	Performance Measure 11.1. Program Participants <i>[italics]</i> shall comply with applicable federal, provincial, state, and local forestry and related environmental laws and regulations.
Need to address all aspects of SFM	Program Participants shall comply with applicable federal, provincial, state, and local forestry,

	workforce, and related environmental laws and regulations
<ul style="list-style-type: none"> • There is too much discretion allowed in deciding which steps are “appropriate” and which laws are “applicable” or not. • International treaties and accords, statutes and associated standards, and land use laws must also be upheld. 	Program Participants shall take necessary steps to comply with all international treaties and accords, and federal, provincial, state, and local forestry and related environmental and land use laws, statutes, regulations, and associated standards.
more global	add the wording "in the countries in which the program participant operates

Indicators: Access to relevant laws and regulations in appropriate locations. System to achieve compliance with applicable federal, provincial, state, or local laws and regulations. Demonstration of commitment to legal compliance through available regulatory action information. Adherence to all applicable federal, state, and provincial regulations and international protocols for research and deployment of trees derived from improved planting stock and biotechnology.

Rationale for proposed change:	Proposed New Language:
OK	
Add local to #2	Change to “federal, provincial, state, and local...”
11.1.4- seems somewhat redundant given the underlying principle of legal compliance. Consider removing...	
<ul style="list-style-type: none"> • Online access to laws and regulations is easiest and the most timely. • There is too much discretion allowed in deciding which laws are “applicable” or not. • International treaties and accords, statutes, and associated standards must also be upheld. • The use of genetically modified organisms should be prohibited. 	<ol style="list-style-type: none"> 1. Access to relevant laws and regulations in appropriate locations (such as online access). 2. System to achieve compliance with all international treaties and accords, and federal, provincial, state, or local laws, statutes, regulations, and associated standards. 3. Demonstration of commitment to legal compliance through available regulatory action information. 4. Adherence to all applicable federal, state, and provincial regulations and international protocols for research and deployment of trees derived from improved planting stock.

Please use this space to propose any additional indicators for Performance Measure 11.1

Performance Measure 11.2. Program Participants shall take appropriate steps to comply with all applicable social laws at the federal, provincial, state, and local levels in the country in which the Program Participant operates.

Rationale for proposed change:	Proposed New Language:
OK	
Remove unnecessary words.	Performance Measure 11.2. Program Participants

	[italics] shall comply with all applicable social laws at the federal, provincial, state, and local levels in the country in which the Program Participant [italics] operates.
Social laws as in the US may not reach the minimum standard required for SFM	11.2. Program Participants shall comply with all applicable social laws, including the ILO core labor standards in countries where these standards are not applied, at the federal, provincial, state, and local levels in the country in which the Program Participant operates.
<ul style="list-style-type: none"> • There is too much discretion allowed in deciding which steps are “appropriate” and which laws are “applicable” or not. • International laws must also be observed. • Laws in the countries from which wood products are procured must also be upheld. 	Program Participants shall take necessary steps to comply with all social laws at the international, federal, provincial, state, and local levels in the country in which the Program Participant operates or from which they procure wood products.
see the wording above, it conveys a more global SFI outlook	looks fine use it more often

Please use this space to propose any additional indicators for Performance Measure 11.1

Indicator: Written policy demonstrating commitment to comply with social laws, such as those covering civil rights, equal employment opportunities, antidiscrimination and antiharassment measures, workers’ compensation, indigenous peoples’ rights, workers’ and communities’ right to know, prevailing wages, workers’ right to organize, and occupational health and safety.

Rationale for proposed change:	Proposed New Language:
OK	
They need to document infractions, or complaints or lawsuits so the auditor can see whether there are too many or they are within the norm. A written policy is not enough.	
Social laws may not arise to the minimum standard of SFM	Written policy demonstrating commitment to comply with social laws and international conventions, such as those covering, freedom of association, the right to bargain, civil rights, equal employment opportunities, antidiscrimination and antiharassment measures, workers’ compensation, indigenous peoples’ rights, workers’ and communities’ right to know, prevailing wages, workers’ right to organize, and occupational health and safety.
• A “commitment” to comply with laws does not ensure actual compliance.	1. Written policy demonstrating compliance with social laws, such as those covering civil rights, equal employment opportunities, antidiscrimination and antiharassment measures, workers’ compensation, indigenous peoples’ rights, workers’ and communities’ right to know, prevailing wages, workers’ right to organize, and occupational health

and safety.
<p>Please use this space to propose any additional indicators for Performance Measure 11.2</p> <p>2. Access to relevant laws and regulations in appropriate locations (such as online access). 3. Demonstration of commitment to legal compliance through available regulatory action information.</p>
<p>Please use this space to propose any additional Performance Measures and Associated Indicators for Objective 11</p> <p>Move all BMP compliance and monitoring PM and indicators under 11.1.2 This indicator covers all facets when BMP implementation is considered "mandatory". Mandatory BMPs is "compliance" with the CWA.</p>

SFIS OBJECTIVE FOR PUBLIC AND LANDOWNER INVOLVEMENT IN THE PRACTICE OF SUSTAINABLE FORESTRY

Objective 12. To broaden the practice of sustainable forestry by encouraging the public and forestry community to participate in the commitment to sustainable forestry and publicly report progress.

Rationale for proposed change:	Proposed New Language:
Hard to find or create ways to make public.	To broaden the practice of sustainable forestry by encouraging the public and forestry community to participate in the commitment of sustainable forestry and make available to public progress.
OK	[No Comment]
One of the perceived "weaknesses" of SFI in the Canadian context is around indigenous peoples. Specific comments around 12.4 are found within that section; however consideration should be given to having a specific objective to address indigenous peoples. This in itself will make a strong statement about the significance of the issue and its importance within the SFIS.	[No Comment]

Performance Measure 12.1. Program Participants shall support and promote efforts by consulting foresters, state and federal agencies, state or local groups, professional societies, and the American Tree Farm System® and other landowner cooperative programs to apply principles of sustainable forest management.

Rationale for proposed change:	Proposed New Language:
--------------------------------	------------------------

include Master Logger Programs.	[No Comment]
OK	[No Comment]
Need to include provinces	"state, provincial, and federal agencies; state, provincial, or local groups; professional societies..."
	replace 'state and federal' with 'government' and remove other references to 'state'
To clarify Canadian coverage.	Program Participants shall support and promote efforts by consulting foresters, state, federal and provincial agencies, state or local groups, professional societies, and the American Tree Farm System® and other landowner cooperative programs to apply principles of sustainable forest management.
12.1.2 & 12.1.3 --- Consider elimination of these indicators and replacing them with efforts by the forestry community, in conjunction with the SIC's, to develop appropriate educational materials. The number of packets distributed is a poor measure of effective public engagement.	[No Comment]
12.1.2 and 12.1.3-- Numbers of packets or materials distributed by SFI participants, given to landowners, is a poor measure of effective public engagement.	12.1.2 and 12.1.3-- Consider elimination of these two indicators, and replacing them with development & distribution efforts by the forestry community at-large--in conjunction with the SICs.
add more global intent	in the countries in which the participant operates under the SFI program.
<p>Indicators: Support for efforts of SFI Implementation Committees. Support for the development and distribution of educational materials, including information packets for use with forest landowners. Support for the development and distribution of regional or statewide information materials that provide landowners with practical approaches for addressing biological diversity issues, such as specific wildlife habitat, critically imperiled or imperiled species, and threatened and endangered species. Participation in efforts to support or promote conservation of working forests through voluntary market-based incentive programs (e.g., current-use taxation programs, Forest Legacy, or conservation easements). Program Participants are knowledgeable about credible regional conservation planning and priority-setting efforts that include a broad range of stakeholders. Consider the results of these efforts in planning where practical and consistent with management objectives.</p>	
Rationale for proposed change:	Proposed New Language:
12.1.5 is vague, undefined (i.e. credible) and impractical for procurement organizations. It is mostly practical for landowner participants to "consider these efforts where consistent with management objectives".	Clarify 12.1.5 particularly how a procurement participant considers these efforts when the participants operations are not linked with the landowner's management objectives. Reword the second sentence or move to Obj. 4.
Enhance credibility of the Standard	[No Comment]
OK	[No Comment]
The term "working forest" has the connotation for many as a forest managed solely or dominantly for timber (see, for example Wolf and Klein http://www.uvm.edu/envnr/nsrc/fullprojectpdfs/wolffull02.pdf). It certainly can evoke a strong reaction	4. Participation in efforts to support or promote conservation of forests through voluntary market-based incentive programs (e.g., current-use taxation programs, Forest Legacy, or conservation easements).

<p>amongst certain parties.</p> <p>I think the Sustainable Forest Initiative should encourage the conservation of ALL forests.</p> <p>Also, to correct poor sentence construction and remove words that seem to be providing an "escape clause" for program participants.</p>	<p>5. Program Participants are knowledgeable about credible regional conservation planning and priority-setting efforts that include a broad range of stakeholders and consider the results of these efforts in planning.</p>
	<p>12.1.3- remove 'regional or statewide'</p> <p>12.1.5- revisit the wording an dintent and ensure that it fits within the Ontario /Canadian context as well</p>
<p>To recognize the growth of the computer use.</p>	<p>Modify 12.1.2 to read as follows:</p> <p>2. Support for the development and dissemination of forest landowner educational materials, through a variety of methods, including the distribution of information packets, conducting workshops and briefings, and through electronic means (websites, Webinars, e-mail, etc.).</p> <p>3. Support for the development and distribution of regional, Statewide or provincial information materials that provide landowners with practical approaches for addressing biological diversity issues, such as specific wildlife habitat, critically imperiled or imperiled species, and threatened and endangered species</p>
<p>Rationale: Supports [Name Omitted] efforts in developing this information.</p>	<p>Change: Added invasive species to list of information to provide and develop;</p> <p>“Support for the development and distribution of regional or statewide information materials that provide landowners with practical approaches for addressing biological diversity issues, such as specific wildlife habitat, critically imperiled or imperiled species, invasive species, and threatened and endangered species.</p>
<p>Indicator 12.1.4: Suggest adding "as appropriate" to this indicator. This indicator can be interpreted to mean that participation in these programs is mandatory regardless of relevance or appropriateness to the specific conditions of the landowner. Forcing this participation interferes too much with landowner business decisions and disadvantages small landowners and landowners in regions where participation options are not available or primarily consist of easements options with unreasonable requirements.</p> <p>Indicator 12.1.5: Suggest deleting this indicator. As a participant in several of these "conservation planning efforts", I have learned that the results of these efforts are often totally unrealistic or have objectives</p>	<p>Indicator 12.1.4: Suggest adding "as appropriate" to this indicator.</p> <p>Indicator 12.1.5: Suggest deleting this indicator.</p>

<p>that are so watered down to accomodate multistakeholder concensus as to be meaningless. These efforts frequently downplay the impacts of urban development and agriculture on conservation objectives while focusing on how industrial forests management should be altered to achieve their objectives. Decision-making is frequently dominated by polarized agendas from industrial forest management and environment group reresentatives with less interest in scientific credibility than acheiving gains in overly simplified political agendas. Further, many of these efforts do not have the funding to adequately engage techinal experts to address the feasibility of the conservation objectives. It would be great if there were enough truly "credible" efforts throughout the regions where SFI is being implemented but this is sadly not the case. It is not fair to ask SFI participants to "become knowledgable" about these efforts if none exist that are truly credible.</p>	
<p>Indicator 4: Suggest revisiting the intent and ensuring that it fits within the provincial and Canadian context.</p>	<p>[No Comment]</p>
<p>How do you audit "consider the results"? And, again, "where practical and consistent with management activities" takes any teeth out of the standard.</p>	<p>5.Program Participants are knowledgeable about credible regional conservation planning and priority-setting efforts that include a broad range of stakeholders. Incorporate the results of these efforts in planning and management activities.</p>
<p>Please use this space to propose any additional indicators for Performance Measure 12.1</p>	
<p>12.1.(2) and (3) [Name Omitted] believes State Implementation Committees should be charged with recommending alternatives to the current practices of landowner packets. Perhaps there are betters ways to effectively reach landowners to share information on use of BMPs, identifying and protecting important wildlife habitat elements, including critically impreiled and imperiled species.</p> <p>[Name Omitted] also suggest that the standard should be amended with regard to regional conservation planning knowledge. While it is important to be aware of conservation planning efforts, it is difficult to use such information when procuring fiber. Therefore, the ability to "consider results in planning where practical" is in fact, not practical. We encourage achieving this through support of various NGOs which are involved in such planning. We are not able to make the decision for the landowner and therefore, our procurement strategies would not be altered by the planning efforts. We would have more success being supportive of such NGO work where we find it is appropriate and where it does not violate private property rights.</p>	
<p>Performance Measure 12.2 Program Participants shall support and promote, at the state, provincial or other appropriate levels, mechanisms for public outreach, education, and involvement related to forest management.</p>	
<p>Rationale for proposed change:</p>	<p>Proposed New Language:</p>

OK	[No Comment]
Program participants need to increase the focus on education and outreach programs. These programs are typically the first to go as budgets tighten. A more strongly worded requirement by SFI can help justify participation by companies.	Strengthen language by deleting text to read: Program Participants shall support and promote mechanisms for public outreach, education and involvement related to sustainable forest management.
<p>Indicators: Support for the SFI Implementation Committee program to address outreach, education, and technical assistance (e.g., toll-free numbers, public sector technical assistance programs). Periodic educational opportunities promoting sustainable forestry, such as field tours, seminars, or workshops; educational trips; self-guided forest management trails; or publication of articles, educational pamphlets, or newsletters. support for state, provincial, and local forestry organizations and soil and water conservation districts. Recreation opportunities for the public, where consistent with forest management objectives.</p>	
Rationale for proposed change:	Proposed New Language:
12.2.3 – Drop recreational opportunities for the public where consistent with forest management objectives. This does not belong in objective 12 (procurement). More appropriate for land owners.	[No Comment]
OK	[No Comment]
[No Comment]	Change #1 to include “email contact information” at end of parenthetical Change #2a to read “seminars, short courses, workshops, or distance learning venues;” Change #2d to include brochures after pamphlets
12.2.3 Recreation opportunities consistent with forest management objectives should be relocated into Objective 6 (land management responsibility). As a procurement only organization, I have to justify that this indicator is non-applicable during each audit.	Delete indicator number 3 and relocate to Objective 6.
Indicator 1 is similar to Indicator 1 for performance measure 12.1. Suggest combining the 2 indicators into 1.	[No Comment]
For a state like Vermont, the inability of small craft operations, cabinet shops, or small scale furniture builders to apply the SFI logo means that for most Vermonters, SFI certification is remote, meaningless, and useless.	[No Comment]
Reference to SFI SICs in 12.2.1 is exclusive rather than inclusive. SICs are not the only means by which to address outreach and education.	Support for programs to address outreach, education, and technical assistance
•12.2.3 – Drop recreational opportunities for the public where consistent with forest management objectives. This does not belong in objective 12 (procurement). More appropriate for land owners.	•12.2.3 – Drop recreational opportunities for the public where consistent with forest management objectives. This does not belong in objective 12 (procurement). More appropriate for land owners.
<p>Please use this space to propose any additional indicators for Performance Measure 12.2</p>	
4. Opportunities for public participation in forest management planning processes.	

4. Provide sub-licensing so that individual wood workers, craftsmen, or cabinet shops may advertise their product as containing SFI certified wood.	
4. Promote advertisement of SFI, Inc. and SFI certification, such as a. trade advertisement b. logo/label use c. market campaigns	
Add as 12.2.4: Outreach and education of stakeholders such as conservation groups, indigenous peoples and community groups to promote sustainable forestry.	
Performance Measure 12.3. Program Participants with forest management responsibilities on public lands shall participate in the development of public land planning and management processes.	
Rationale for proposed change:	Proposed New Language:
OK	
Indicators: Involvement in public land planning and management activities with appropriate governmental entities and the public. Appropriate contact with local stakeholders over forest management issues through state, provincial, federal, or independent collaboration.	
Rationale for proposed change:	Proposed New Language:
OK	
Please use this space to propose any additional indicators for Performance Measure 12.3	
Performance Measure 12.4. Program Participants with forest management responsibilities on public lands shall confer with affected indigenous peoples.	
Rationale for proposed change:	Proposed New Language:
OK	[No Comment]
In light of the sensitivity and importance of indigenous peoples' land use rights, consideration should be given to enhancing this PM - suggestion being that it be given its own Objective. This alone will reflect the significance of the issue and reflect SFI's commitment towards indigenous peoples. Need to be cautious as to not be too restrictive or to commit to or expect too much on the part of the program participant though as there is only so much that they are legally in a position to do...	
In light of the sensitivity around indigenous people's land use rights in Canada, consideration should be given to enhancing this PM.	

<p>Consider making Indigenous Peoples as a new Objective. This alone will reflect the significance of the issue.</p> <p>Be cautious not to be too restrictive here though as Canadian Government has the primary role with respect to claims, needs and negotiations, etc.</p>	
<p>Limiting the consultation to a narrow schedule of Native Americans has deleterious effect. How does a Native American sawmill differ from a Yankee sawmill? Why should a Native American be accorded privileged status in application of forestry techniques which are clearly not aboriginal.</p>	<p>REPLACE: indigenous peoples with local populations.</p>

Indicator: Program that includes communicating with affected indigenous peoples to enable Program Participants to understand and respect traditional forest-related knowledge; identify and protect spiritually, historically, or culturally important sites; and address the sustainable use of nontimber forest products of value to indigenous peoples in areas where Program Participants have management responsibilities on public lands.

Rationale for proposed change:	Proposed New Language:
OK	[No Comment]
[No Comment]	Add “sensitive” to b, after “historically.”
Native tribes deserve better treatment whether on or off federal land. Their traditions should be kept alive by being allowed to practice them on any lands they have done so historically. They should at least be given the rights of the native wildlife!!!	c. actively participate in and sponsor the sustainable use of nontimber forest products of value to indigenous peoples.
See above	SUBSTITUTE: local populations for indigenous peoples.

Please use this space to propose any additional indicators for Performance Measure 12.4

1d. conform with the principal of Free, Prior Informed Consent (FPIC) as outlined by the United Nations Declaration on the Rights of Indigenous Peoples (2008), by which Program Participants

1. recognize indigenous people’s right to determine and develop priorities and strategies for the development or use of their lands or territories and other resources,
2. obtain their free and informed consent prior to the approval of any project affecting their lands or territories and other resources, particularly in connection with the development, utilization or exploitation of mineral, water or other resources,
3. provide effective mechanisms for just and fair redress for any such activities, and
4. take appropriate measures to mitigate adverse environmental, economic, social, cultural or spiritual impact.

Declaration available at: http://www.un.org/esa/socdev/unpfii/documents/DRIPS_en.pdf

Performance Measure 12.5. Program Participants shall establish, at the state, provincial, or other appropriate levels, procedures to address concerns raised by loggers, consulting foresters,

employees, the public, or Program Participants regarding practices that appear inconsistent with the SFI Standard principles and objectives.	
Rationale for proposed change:	Proposed New Language:
OK	[No Comment]
Need to include all aspects of the forest workforce	12.5. Program Participants shall establish, at the state, provincial, or other appropriate levels, procedures to address concerns raised by the forest workforce, consulting foresters, employees, timber dependent communities, the public, or Program Participants regarding practices that appear inconsistent with the SFI Standard principles and objectives.
<p>Indicators: Support for SFI Implementation Committee efforts (toll-free numbers and other efforts) to address concerns about apparent nonconforming practices. Process to receive and respond to public inquiries.</p>	
Rationale for proposed change:	Proposed New Language:
OK	[No Comment]
<p>Please use this space to propose any additional indicators for Performance Measure 12.5</p>	
Add "Documentation of types of inquiries and any actions that need to be taken."	
3. Public access to full certification reports and audit summaries to provide information necessary to make necessary appeals and prevent unnecessary appeals.	
<p>Performance Measure 12.6. Program Participants shall report annually to the SFI Program on their compliance with the SFI Standard.</p>	
Rationale for proposed change:	Proposed New Language:
Enhance Credibility of the Standard	[Name Omitted] believes that certain components of the report should be changed. What is the value of Section 3 which asks how many landowners received packets of information on regeneration and BMPs... many times this is provided after the decisions by the landowner have been made or the job is completed and has little value. Section 4 of the annual report (Landowner Outreach). [Name Omitted] questions the value of providing information on "assistance provided towards acres regenerated artificially; regeneration completed within 2 years of harvest; regenerated naturally.
OK	[No Comment]
The public must be able to access all reports for quality control and transparency.	Program Participants shall report annually to the SFI Program and the public on their compliance with the

SFI Standard.	
<p>Indicators: Prompt response to the SFI annual progress report. Recordkeeping for all the categories of information needed for SFI annual progress reports. Maintenance of copies of past reports to document progress and improvements to demonstrate conformance to the SFI Standard.</p>	
Rationale for proposed change:	Proposed New Language:
OK	[No Comment]
Indicator 1 makes little sense to me. What response is the report requiring? Perhaps we mean what I say below.	Indicator 1. Prompt annual reporting according to the Sustainable Forestry Initiative requirements and deadlines.
<p>Please use this space to propose any additional indicators for Performance Measure 12.6</p>	
<p>4. Reports that describe the resources on the Program Participant's certified lands, explain their performance relative to each Indicator, and provide a timeline and plan for addressing any nonconformances to the SFI standard.</p> <p>5. Even balance among members of the External Review Panel between economic, environmental, and social interests.</p> <p>6. Certification reports and decisions must be independently peer-reviewed by qualified resource professionals to ensure compliance with SFI standards and the best scientific information available.</p>	
<p>Please use this space to propose any additional Performance Measures and Associated Indicators for Objective 12</p>	

<p>SFIS OBJECTIVE FOR MANAGEMENT REVIEW AND CONTINUAL IMPROVEMENT</p>	
<p><i>Objective 13. To promote continual improvement in the practice of sustainable forestry and monitor, measure, and report performance in achieving the commitment to sustainable forestry.</i></p>	
Rationale for proposed change:	Proposed New Language:
none needed	[No Comment]
OK	[No Comment]
"Continual improvement" has become a cliché in many areas of business, politics, and in the environmental community. It is well-qualified here in	Italicize "continual improvement".

<p>the performance measures, but it would not hurt to include a definition to set the Sustainable Forestry Initiative apart from those that toss the term around as jargon with little understanding of what it means. See Definitions below for more.</p>	
<p>To “promote” continual improvement does not ensure actual improvement.</p>	<p>To continually improve the practice of sustainable forestry and monitor, measure, and report performance in achieving the commitment to sustainable forestry.</p>
<p>How do we measure "continuous improvement" once all the low-hanging fruit has been harvested? For instance - when mill "A" is @ 99.5% for wood deliveries through "qualified loggers" - How can you get that last .5% to reach the 100% mark?</p>	<p>[No Comment]</p>

Performance Measure 13.1. Program Participants shall establish a management review system to examine findings and progress in implementing the SFI Standard, to make appropriate improvements in programs, and to inform their employees of changes.

Rationale for proposed change:	Proposed New Language:
OK	[No Comment]

Indicators: System to review commitments, programs, and procedures to evaluate effectiveness. System for collecting, reviewing, and reporting information to management regarding progress in achieving SFI Standard objectives and performance measures. Annual review of progress by management and determination of changes and improvements necessary to continually improve SFI conformance.

Rationale for proposed change:	Proposed New Language:
OK	[No Comment]

<p>#3 - first time “conformance” with the SFI is mentioned - needs to be addressed early on in the standard. It also requires a definition, especially since you have them for minor and major nonconformances.</p>	<p>#3 – add “and employees” and “management”</p>
---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------

<p>The purpose of evaluating effectiveness should be to assess sustainability.</p>	<ol style="list-style-type: none"> 1. System to review commitments, programs, and procedures to evaluate their effectiveness at achieving sustainability. 2. System for collecting, reviewing, and reporting information to management regarding progress in achieving SFI Standard objectives and performance measures. 3. Annual review of progress by management and determination of changes and improvements necessary to continually improve SFI conformance.
------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Please use this space to propose any additional indicators for Performance Measure 13.1

4. Implementation of necessary changes and improvements to SFI conformance

5. Independent third-party verification of compliance with and enforcement of standards.	
<p>Please use this space to propose any additional Performance Measures and Associated Indicators for Objective 13</p>	
<p>General Comments Please use this space to add any general comments regarding the SFI Program. Please provide the rationale for your comments and any proposed changes.</p>	
Rationale for proposed change:	Proposed New Language:
Maintain the existing structure of the SFI Standard; land management objectives coupled with procurement system objectives. Splitting the standard could result in the loss of PEFC endorsement for the procurement portion as a stand-alone standard and would add more complexity to the audit process. SFI Inc. should evaluate each proposed addition/change to ensure that the proposed edit adds significant value over cost and is clearly auditable. The current standard is working very well, withstanding criticism, and can be implemented at an acceptable cost. Each proposed change can add additional work and cost to participating organizations and SICs.	[No Comment]
Way too much time and money is being thrown at PM 8.4 considering that forestry ownership of BMPs and implementation is one of our success stories. The uniquely high implementation rates (compared to regulatory programs) and effectiveness of BMPs warrants a reduced effort in this area and allowing participants to redirect time and money to any weaknesses of SFI implementation. Times are tough and overall participant efforts should be re-prioritized to where measurable improvements are essential and more effectively quatifiable.	Re-write or even drop the specifics of PM 8.4
Enhance Credibility of the Standard	[Name Omitted] believes the standard should stay as one standard with two chapters. Therefore, land certification chapter would include objective 1-7, and 9-13 (re number as Chapter I, Objectives 1-12); Procurement would be objectives 8-13.
[Name Omitted] feels the current standard is working well and suggests as few changes as possible to the new standard as it is being developed.	[No Comment]
Some recognition of the role that state (province?) Master Loggers play with respect to sustainable forestry should be mentioned.	[No Comment]
Other comments:	[No Comment]

Of concern is the current land development component of forest industry. Only one large integrated forest management company remains in the U.S. All of the rest have become TIMOs (Timber Investment Management Organizations) or REITs (Real Estate Investment Trusts). These may manage land holdings using forestry, but are actively selling lands, primarily for development purposes. A company should not be able to be considered to practice sustainable forestry if it can sell off any parcel it wants that may have severe impacts on wildlife or other levels of biodiversity, but is not held responsible for these impacts because they no longer own the land. Companies must be held accountable for the impacts to wildlife or biodiversity resulting from the sale of their lands to development. If such sales cause losses to wildlife or biodiversity, then the company, and all of its remaining lands, should not be considered to be practicing sustainable forestry.

General comments on objectives: non-timber forest products and stakeholder groups seem to be excluded from most objectives. For instance recreationists are identified only sparingly (an only as examples), as are private landowners (non-woodlot or forestry related ownership that is) and yet represent some of the major conflict groups with forestry operators. Some objectives provide for their input or comment (e.g. 2.2) but none of the land management objectives consider co-management or input in the decision process. There doesn't seem to be a natural fit with the listed indicators except to include a 'sensitivity' towards their inclusion.

Comment on paragraph 6 of introductory text under "Principles of Sustainable Forestry": This seems to be a largely political statement rather than core to SFM especially in Canada. It may be locally valid to discuss family forest owners in the Canadian context but to suggest that "The percentage of family forestland owners in Canada is smaller" is a major understatement. Of the 416 million ha of forests in Canada only 25 million ha is in private holdings of any kind. By Province only the maritimes (excluding Newfoundland-Labrador) has more than 50% of the forest in private holdings and most Provinces have less than 10% private ownership. Some sectors (by specialty product-type) are dependent on private sources (e.g. fuelwood, christmas trees, hardwoods such as maple for

<p>furniture) and obtain more than 75%-100% of their supply from those sources. However, the dominant paradigm in Canada is forestry management on Crown Lands through forest licenses. Given the history of political discourse regarding public vs. private ownership especially between the U.S. and Canada and the associated trade disputes, I find the two paragraphs to be American-centric. Does SFI apply only to owned and leased lands? Does this exclude much of Canada where access is in the form of licensed access (is a lease also a license in the Canadian sense)?</p>	
<p>While I have attempted to point out a few areas where wording could be improved, the various documents we are reviewing here would be improved by a more exhaustive English style and grammar review. For example, in SFI Label Use and Fiber Sourcing Requirements "unacceptable" is preferred to "non-acceptable" and paragraphs 5.4.5.1 and 5.4.5.2 have an awkward mix of possessive and plural forms ("...of a product(s) or manufacturing unit's raw material...") that might benefit from rewording (such as "...the raw material for a product(s) or a manufacturing unit...").</p> <p>Such a style review would make the documents more professional.</p> <p>*****</p> <p>Since there is no other place to add an objective, I will do so here:</p> <p>The Sustainable Forestry Initiative has no requirement for program participants to write an overarching Management Plan, yet it is a major feature of the Forest Stewardship Council and Canadian Standards Association programs; state and provincial forest management jurisdictions in the U.S. and Canada; and indeed a key focal point of my forestry training and that in universities today.</p> <p>The Forest Stewardship Council includes the Plan as a principle. The Canadian Standards Association describes Plan requirements in its planning chapter. Logically a Management Plan would be a performance indicator under a broad forest management planning objective but there is no such objective in the Sustainable Forest Initiative program (Objective 1 is too narrow because it is a timber objective). I have opted to include a new</p>	<p>New Objective 1: For a defined forest area, to integrate the planning of the management of timber, forest productivity, water quality, wildlife habitat and biological diversity, visual impacts, and special sites to meet the requirements of sustainable forestry [italics]</p> <p>Performance Measure 1.1: Program Participants [italics] shall complete an overarching strategic plan known as the Forest Management Plan that describes the management of all forest resources consistent with the principles of the Sustainable Forestry Initiative Program and the requirements of sustainable forestry [italics]. The Forest Management Plan should contain, at minimum, the following:</p> <ul style="list-style-type: none"> -description of the area covered by the plan -description of management values -indicators chosen -a long-term resource analysis (see Performance measure [currently 1.1], Indicator 1) -...[this requires more study and analysis than I have time for] <p>Indicators</p> <ol style="list-style-type: none"> 1. A written plan that is posted on the Sustainable Forestry Initiative website. 2. A long-term resource analysis (see performance measure [currently 1.1], Indicator 1)

<p>Objective 1, and renumber the other objectives. I don't care much as long as there is an explicit requirement for a plan that it is presented as a cornerstone of the Program.</p> <p>The Sustainable Forest Initiative Forest Management Plan requirements could be gleaned from the best of forest management plan formats of other certification programs, forest management companies, and public jurisdictions. It could make a powerful statement for the SFI Program.</p> <p>It need not be much extra work because many of the pieces that should be included in the Plan are found in other parts of the standard.</p>	
<p>In the 2.2 indicator, the alternance in the use of chemicals and pesticides should be avoid, and it should be only the term pesticide used. If other chemical as to be addressed, a new indicators for chemical should be created.</p>	<p>Pesticide rather than chemical should be used in 2.2.1, 2.2.5, 2.2.6 a, b, f, and i.</p>
<p>As Objective 10 is considering additional training requirements for LT&E courses, it should be taken into consideration of combining current LT&E courses with the new subject matter rather than adding an additional "day" to the existing training. For example, the Invasive Species subject matter could be incorporated into the BMP workshops.</p> <p>Logging professionals are already being asked to participate in a minimum of 8 hours of CE each year which equates to a lost day of production for many, plus the expense of sending one or more of their crew to the sessions. By combining the coursework, there would be no further financial burden to the participating contractors.</p>	<p>[No Comment]</p>
<p>We would prefer to keep any changes to the standard to a minimum. The current requirements provide for good forest stewardship. Any substantive changes to the text of the standard may drastically alter it's interpretation in one of the many jurisdictions it covers.</p>	<p>[No Comment]</p>
<p>Overall there is a need to integrate all aspects of SFM into the objectives. In addition need to address the issue of forest land conversion to other uses by landowners and program participants.</p>	<p>[No Comment]</p>
<p>1. Consider moving indigenous peoples' interests into its own Objective 2. Liked the SFI logo over bark concept on the cover... suggest similar visual except instead of bark, over-lay the logo over a photo mosaic showing examples from each of the principles of the standard...</p>	<p>[No Comment]</p>
<p>Keep the SFI standard structured as is, but highlight</p>	<p>[No Comment]</p>

<p>the procurement aspects of the SFIS. One way to begin this is to add clarifying language to the introduction of the "Objectives for Sustainable Forestry" on page 4 of the SFIS by including the scope after "SFIS Objectives" in each heading. Thus, for objectives 1-7 , add "SFIS Objectives 1-7 for Land Mangement", for objective 8, add "SFIS Objective 8 fo9r Procurement," and for objectives 9-12, add "SFIS Objectives 9-12 for Forestry Research, Education, Legal Compliance, and Continual Improvement."</p> <p>SFI, Inc. should strive to differentiate the SFI from other standards as a result of the strength of the procurement, training, research and SIC provisions.</p> <p>SFI, Inc. should ensure that any additions/changes to the SFI Standard are evaluated and demonstrated to be clearly auditable.</p> <p>SFI Inc. should establish partnerships with organizations such as the U.S. Forest Service, Society of American Foresters, Conservation Fund, The Nature Conservancy, National Council for Air and Stream Improvement and other entities, to conduct joint studies designed to gather information on rates of compliance with state, federal (U.S. and Canada) and provincial regulations designed to protect water quality. Such joint studies could also extend to forest reforestation and regeneration activities, voluntary programs to protect endangered species and species at risk, and compliance with state and provincial forest practice laws. Since compliance with such forest-related laws and regulations is required under the SFIS, this would enable SFI Inc. to gain knowledge about the reach and effectiveness of the Standard on forested lands.</p>	
<p>Program participants have made significant investments in Environmental Management Systems to implement the current standard. Implementation of the current standard has been an overwhelming success accomplishing significant improvements toward sustainable forestry. Only make essential changes to keep the standard up-to-date.</p> <p>Maintain the current standard structure. Do not split the standard into Land only and Procurement only versions.</p>	<p>[No Comment]</p>
<p>Although this has been previously addressed by a</p>	<p>[No Comment]</p>

<p>prior SFIS Canadian Review and Interpretations Task Force (CTF), I think the issue of whether there should be a separate SFI Standard for Canadian participants should be re-examined. There is currently more land certified by Canadian SFI Participants than American SFI Participants (39,199,788 ha vs. 22,539,622 ha). The majority of references made throughout the SFI Standard are for American processes and legislation. Creating a Canadian SFI Standard may increase the credibility of the SFI Standard and SFI Inc.</p>	
<p>1) The current SFI Standard is substantial and rigorous. We support using this review process primarily to refine the existing elements of the Standard, not to add more requirements.</p> <p>2) Past decisions of what is required by the indicators (especially in Objectives 9, 10 and 12) have not adequately considered impacts to smaller participants with limited staff time and discretionary funds to achieve non-operational requirements. In particular, there appears to be an assumption that SFI participants can spare one or more FTEs to attend meetings and work on regional elements of the Standard, yet we continue to try to promote SFI for all participant sizes. If we want smaller organizations as participants, we must revisit the indicators in view of FTE expectations for non-operational requirements.</p> <p>3) SFI participants, especially certified participants, are held to a rigorous expectation of following their internal SFI-related policies and having implementation processes that are understood throughout the organization. SFI Inc needs to apply similar rigor to its own processes for updating and disseminating changes to SFI documents and policies. Further, NO CHANGES in SFI implementation should be allowed before a written document is available for all to read and understand. Finally, the decision to change policies must include advance warning to all SFI participants and a transparent and standardized process to get feedback from participants. Current examples of SFI Inc failure to achieve this include the status of the SFI APQ, and the influence of ANAB directives via auditors on SFIS interpretations. SFI Inc must assume a proactive leadership role in changes to SFI policies and how these changes are communicated to SFI participants. This has not been the case recently. Suggestions for improvement include:</p> <p>a) No changes to policies (such as the SFI APQ)</p>	<p>[No Comment]</p>

<p>until a written document is available. Participants should not have to rely on word-of-mouth communications to know which elements of the current documents are no longer accurate/applicable, much less new unwritten requirements.</p> <p>b) All policies, documents, etc need to be identified as draft or final versions, they must have revision dates, and naming conventions for these documents must be standardized. For example, in March 2008, a new version of the SFI Interpretations was sent to participants via email, then another version was released two weeks later. There was not adequate information on either of these documents to identify that the first was a draft and that the second superceded the first.</p> <p>c) ANAB has made it clear that certain elements of the current SFIS and APQ are inconsistent with their requirements. There needs to be a formalized process by SFI Inc to address these inconsistencies. ANAB should summarize all the inconsistencies and SFI Inc should then forward these to all participants. No changes to SFIS, APQ, Interpretations, etc should occur until after a transparent review process of all of these issues. Unfortunately, the current approach seemed to be that ANAB is changing SFI policies indirectly through pressure of certification bodies rather than direct communication with SFI Inc.</p>	
<p>There were no spaces allocated for the following comments:</p> <p>Audit Procedures and Qualifications</p> <p>6.1.3 Changes are necessary for objectivity.</p> <p>Pilot Project: Conservation of “Alliance for Zero Extinction” Sites</p> <ul style="list-style-type: none"> • To “promote” conservation is not stringent enough to prevent the extinction of these highly endangered species. • “Vulnerable” species as listed by the IUCN Red List face a high risk of extinction in the wild, and therefore must also be protected. • Any species, not just vascular plant and vertebrate species, in one of these three categories requires protection. <p>Please also see our coalition's letter to the Sustainable Forestry Board for more comments on the current SFIS.</p>	<p>Audit Procedures and Qualifications</p> <p>6.1.3 Program Participants, with consent of the audit firm, may substitute or modify indicators to address local conditions based on a thorough analysis and adequate justification to the audit firm, which is responsible for ensuring that revised indicators are</p> <ol style="list-style-type: none"> a. consistent with the spirit and intent of the SFI Standard performance measures and indicators, b. necessary and appropriate for the specific local conditions and circumstances and the Program Participant’s scope of operation, and c. consistent with the principle of sustainable forestry. <p>Additional indicators beyond those identified in the SFI Standard, if included by the Program Participant, shall be audited like all other indicators.</p> <p>Pilot Project: Conservation of “Alliance for Zero Extinction” Sites</p> <p>Performance Measure: Procurement consistent with the conservation of priority sites for Vulnerable,</p>

	<p>Endangered, and Critically Endangered species and may include participation in external programs such as the Alliance for Zero Extinction.</p> <p>Indicator: 1. Program to protect priority sites; Program Participants are strongly encouraged to provide legal protection, such as permanent conservation easements, for these sites in countries where such protections exist or equivalent protection where they do not exist.</p> <p>New associated definitions: Priority sites. 1. Endangerment: A site must contain at least one Vulnerable (VU), Endangered (EN), or Critically Endangered (CR) species, as listed by the IUCN Red List. 2. Irreplaceability: A site should only be designated if it is the sole area where an EN or CR species occurs, or contains the overwhelmingly significant known resident population of the EN or CR species, or contains the overwhelmingly significant known population for one life history segment (e.g., breeding or wintering) of the EN or CR species. 3. Discreteness: The area must have a definable boundary within which the character of habitats, biological communities, and/or management issues have more in common with each other than they do with those in adjacent areas.</p> <p>Vulnerable, Endangered, or Critically Endangered species. In this context means vascular plant and vertebrate species that face extinction either because their last remaining habitat is being degraded at a local level, or because their tiny global range makes them especially vulnerable to external threats.</p>
<p>[Name Omitted], a third-party certified participant in the Sustainable Forestry Initiative® since 2002, expresses its support for the 2005-2009 SFI Standards. The Standards as they now exist provide outstanding Principles, Objectives and Performance Measures that define sustainable forestry.</p> <p>Though we have been practicing sustainable forestry for decades, the Sustainable Forestry Initiative® has challenged our business systems to improve and perform at a higher level. The company and our employees have come to value</p>	<p>[Name Omitted], a third-party certified participant in the Sustainable Forestry Initiative® since 2002, expresses its support for the 2005-2009 SFI Standards. The Standards as they now exist provide outstanding Principles, Objectives and Performance Measures that define sustainable forestry.</p> <p>Though we have been practicing sustainable forestry for decades, the Sustainable Forestry Initiative® has challenged our business systems to improve and perform at a higher level. The company and our employees have come to value</p>

<p>the Standards as a positive influence to our daily operations.</p> <p>Practicing forestry requires a long-term investment and outlook. It is our hope that the Sustainable Forestry Initiative® Program continues to evolve to reflect improvements in best practices and advancements in science and technology, while resisting pressures to adopt or modify standards based solely on popular opinion.</p>	<p>the Standards as a positive influence to our daily operations.</p> <p>Practicing forestry requires a long-term investment and outlook. It is our hope that the Sustainable Forestry Initiative® Program continues to evolve to reflect improvements in best practices and advancements in science and technology, while resisting pressures to adopt or modify standards based solely on popular opinion.</p>
<p>The timber industry began large-scale, industrial logging in Alaska only about fifty years ago. Our timber typically has a rotation age of about one hundred years. Consequently, we must continue harvesting old-growth timber for about another fifty years.</p> <p>Also, most of the old-growth timber in Alaska is in areas that have not been 'roaded'. Consequently, when we harvest old-growth timber, we must frequently construct roads into roadless areas.</p> <p>Most of Alaska will remain roadless and most of the old-growth timber will remain untouched. However, we must continue to develop roads in some roadless areas and we must continue logging old-growth timber for the next fifty years.</p>	<p>We should have a clear statement that logging old-growth timber and constructing roads in some roadless areas is permissible for SFI participants as long as the landowner addresses issues such as biodiversity at the landscape level, compliance with BMPs, etc..</p>
<p>Please note that [Name Omitted] actively participated in SFI Standard review process in several SICs and other venues. In particular, our company is accepting of the comments and proposed revisions submitted by [Name Omitted] and [Name Omitted].</p>	<p>[No Comment]</p>
<ul style="list-style-type: none"> • SFI Inc. should evaluate each proposed addition/change to ensure that the proposed edits 1) add significant value; 2) do not have negative, unintended consequences; and 3) are clearly auditable. The current standard is working very well, withstanding criticism, and can be implemented at an acceptable cost. • Maintain the existing structure of the SFI Standard, i.e. land management objectives coupled with procurement system objectives. Splitting the standard could result in the loss of PEFC endorsement. 	<p>[No Comment]</p>
<p>I find the information regarding wildlife and its habitat protection to be stated in an excellent fashion. The reputation of excellent we seek or the fraud detractors will claim will be earned by the application of these criteria and the analysis of the remains of the forest once the harvest has occurred. The early and public demonstration of forest</p>	<p>[No Comment]</p>

<p>ecology is critical to the establishment of the desired reputation.</p>	
<p>1.The current Standard is working very well and can be implemented at reasonable cost. 2.Evaluate each proposed addition/change to ensure that the proposed edits add value, do not have unintended consequences, and are clearly auditable. 3.Significant structural changes to the Standard should be avoided. Program participants have had to continuously modify their environmental management systems due to structural changes to the Standard. Changes such as these add unnecessary implementation costs to Program Participants. 4.Regarding Objective 4, we are concerned with language which references specific organizations (AZE, Conservation International) and requests that generic language be considered in the Standard. Reference to specific organizations or programs is limiting and the intent of Performance Measures or Indicators could be lost. 5.Continue to focus protection needs on G1/G2 species and communities and avoid consideration of S-ranked species and communities. S-ranks do not adequately account for issues such as species on the edge of their range. 6.Keep Objective 8 as a stand-alone objective. Incorporation of procurement standards into the land management objectives will reduce the clarity of the Standard.</p>	<p>[No Comment]</p>
<p>Would strengthen the SFI program if labeling guidelines are updated to create better controls around non-certified wood coming from international sources. Also, governance reforms should mandate cross-chamber representation on all committees, etc. Public reporting also needs to be strengthened significantly to increase transparency within the program.</p>	<p>[No Comment]</p>
<p>(COLUMNS TEMPORARILY MERGED TO ACCOMMODATE LONG, SINGLE-COLUMN RESPONSE)</p>	
<p>Since forest certification became an accepted means to independently verify the quality of forest management in the mid-1990s the practice has provided a useful tool for assessing the environmental and social performance of forest products. Where it is used, certification has measured the impact of forest operations on biological diversity, the wellbeing of indigenous people, the wellbeing of forest dependent communities and the sustainability of forest products.</p> <p>The available forest certification schemes are global, national or a combination of global and national in scope. Each has in common the use of standards to describe and measure the elements of “good” forest management, a system of accreditation to ensure the independence of forest audits and a system of governance. They also have in common the absence in their standards of any direct reference to climate change and the management of forests. In 2008 this is very surprising, even alarming.</p>	

Forest certification standards are revised on a regular basis to reflect change in knowledge and a commitment to continual improvement. Yet none of the major schemes have incorporated climate change into revisions of their standards. And this is notwithstanding that climate change has come to dominate the environmental agenda worldwide, and that the role of forests related to climate change is well established.

It's time for action. Climate change needs to be incorporated as a defining element within forest certification as a priority, while giving consideration to at least the following factors:

1)The ecological change occurring in forests as a result of climate change including the migration of species and habitats, increased incidence of wildfire and catastrophic weather, insect and disease outbreaks.

- As the climate warms models predict that tree species will migrate into and populate new ecological zones. Entire forests will shift and disperse as temperatures rise and precipitation patterns change. There is already evidence to support these predictions of climate models.

- An ecological shift of tree species and forest landscapes will inevitably be accompanied by changes in wildlife habitat, the migration of species and loss of species that fail to adapt to often rapid change.

- In forests managed for the production of timber it may take anywhere from 15 to 120 years to grow a tree to commercial maturity. In a world of climate change how will foresters anticipate whether the tree species they are planting today will be appropriate to the site decades into the future?

- In some locations a warming climate will bring with it long periods of drought increasing the likelihood of forest fires.

- Increases in storm intensity predicted by some climate models can result in large areas of forest being severely altered by wind and floods.

- Catastrophic insect and disease outbreaks are predicted by a warmer climate. A dramatic example can be found in British Columbia where 13.5 million hectares of forest have been affected by a catastrophic mountain pine beetle epidemic.

In lodgepole pine dominated stands vast swaths of forest have been killed in the past decade. Researchers report that climate change—prolonged warmer seasonal temperatures—has played a central role in the outbreak. The loss of forest habitat is unprecedented; the economic toll is in the billions of dollars, the social toll is reflected in the decline of numerous forest dependent communities.

2)The potential use of forests for the commodity production of wood-based biofuels.

- High energy prices and efforts to curb greenhouse gas emissions stemming from the use of fossil fuels have given rise to a growing use of biofuels. Wood-based biofuels used for the generation of electricity are increasingly seen as a renewable source of energy. The use of forest biomass as a residual or primary commodity for energy production will create a new forest economy and new forest management challenges. Consideration has to be given to the conservation of soils and biodiversity and the impact on social institutions and values associated with managing forests for energy production.

3)The use of forests for carbon offsets

- If forests are to be managed for carbon offsets the interaction of management activities related to biodiversity, water and soil conservation need to be considered. Also the social and economic costs and benefits for forest dependent communities and indigenous people have to be part of the equation.

Changing forest landscapes and forest uses accompanies climate change. Clearly, forest certification has a role in independently assessing and transparently reporting practices and progress. If certification doesn't directly address climate change through the addition of this element as a key principle or objective of good forest management it will have missed the boat in the 21st Century.

(End: Columns TEMPORARILY MERGED TO ACCOMMODATE LONG, SINGLE-COLUMN RESPONSE)	
<p>Better objectives or performance measures related to the following are needed:</p> <ol style="list-style-type: none"> 1. Road access planning 2. Climate change 3. ATVs and other off-road-vehicles and their impacts on the land 4. Relationship of SFI the family forest lands (or minimum land ownership for consideration under an SFI certificate) 5. Formal recognition and support of master logger or master forester programs in relation to family forest management 6. Underperforming SICs <p>SFI also needs to become less “timber centric”, showing that economic considerations are equally balanced against social and environmental concerns.</p>	<p>[No Comment]</p>
<p>a. Make only essential changes to strengthen the SFI standard as Program Participants have made significant investments into their environmental management systems</p> <p>b. Change the name of SICs to a more descriptive name that recognizes Canadian provinces and recognizes that SFI is past the implementation stage.</p> <p>c. Include provincial references per SFI Task Force recommendation.</p> <p>d. Keep Objective 8 as a stand-alone objective, do not incorporate procurement requirements through out other SFI objectives.</p>	<p>[No Comment]</p>
<p>I would like to support the detailed comments submitted earlier today by [Name Omitted] Price on behalf of [Name Omitted]. The [Name Omitted] recommendations would strengthen the environmental performance of the Sustainable Forestry Initiative and, in turn, help the SFI program meet its objectives for contributing to good forest land management and building marketplace confidence.</p>	<p>[No Comment]</p>
(COLUMNS TEMPORARILY MERGED TO ACCOMMODATE LONG, SINGLE-COLUMN RESPONSE)	
<p>August 4, 2008</p> <p>(A copy of these comments, formatted as a .pdf document has been sent to Alison Welde, Manager, Conservation Partnerships and Communications.)</p> <p>To: Sustainable Forestry Initiative Inc Board of Directors</p>	

From: **[Name Omitted]**

Re: Comments on 2005-2009 SFI Standard

The **[Name Omitted]** appreciates the opportunity to comment on the 2005-2009 version of the SFI standard. The following commentary on the rigor and credibility of the SFI 2005-2009 Standard and recommendations for revision are exclusively in regards to the SFI 2005-2009 Standard applicable to program participants. Our commentary does not address issues on other aspects of the SFI certification program including membership, governance, accreditation processes, participation levels, chain of custody, and other programmatic themes.

Again, thank you for this opportunity to comment on the 2005-2009 SFI standard. We hope that you will consider these comments.

SUMMARY

[Name Omitted] contends that the SFI must address central environmental and social components of sustainable forestry and demonstration of economic responsibility as well as other shortcomings (e.g. governance, chain of custody, etc.) if it wishes to sincerely claim to represent environmentally, socially and economically sustainable forest management. We encourage you to review the following **[Name Omitted]** Regional Standards that can serve as examples of rigorous and credible standards (Revised Final Lake States-Central Hardwoods Regional Standard v3.0 dated 2/10/05; Revised Final Northeast Regional Standard v9.0 dated 2/10/05; and Revised Final Pacific Coast Regional **[Name Omitted]** Standard v 9.0 dated 5/9/05 – these documents are available at [www. \[Name Omitted\]](http://www.[Name Omitted])

Please note that these comments do not explicitly address the SFI Chain of Custody and labeling requirements. It is our opinion that among other issues, the use of “Percent Content Labels” does not preclude the labeling of wood products that contain highly-controversial, non-certified wood sources. These controversial sources include wood from sources that are high risk of: 1) legality; 2) violation of civil and traditional rights; 3) threat to core environmental conservation values; 4) use of Genetically Modified Organisms (GMOs); and 5) contributing to conversion of natural forest ecosystems to plantations or non-forests. Although the SFI standard addresses the issue of legality, the required self-declarations of legal compliance mean little in the global trade of wood products.

COMMENTARY

[Name Omitted] believes that the following key factors constitute minimum requirements in order for SFI to demonstrate a commitment to forest management that is environmentally, socially and economically sound:

- 1.SFI should not permit large-scale conversion of natural forest to non-forest or plantation uses. There is no mechanism in the SFI system to prevent conversion of natural and complex forest ecosystems to plantations and non-forest systems. The SFI standard includes an indicator that artificial reforestation programs consider the potential ecological impacts of planting a different species mix than that which was harvested. This is not a requirement to prevent conversion.
- 2.The SFI standard should require identification of and maintenance management for forest areas that comprise assemblages of high conservation value (including both social and environmental considerations). There is currently no mechanism to identify forest areas of high conservation value and requirement to limit management in those areas to those activities that maintain or restore those values.
- 3.The SFI standard should include sufficient requirements for stakeholder participation in all forest management. An environmentally and socially robust standard requires that forest managers incorporate into management the consultation with stakeholders on indigenous rights issues, community issues, environmental issues, and other issues related to public values. The SFI standard currently only requires such contact with local stakeholders (including

indigenous groups) in cases of management of public lands.

4.The SFI standard should require that the results of a robust social impact assessment, developed in consultation with all affected peoples and communities, be included in management planning and operations. The social aspects of sustainable forestry, including tenure claims and use rights, worker rights and safety, protection of public values, and community resilience, are not adequately represented in the SFI standard.

5.The SFI standard should incorporate options for regional or local adaptation of the standard. Guidelines for sound forest management are not uniform across North America. Regional variations in the SFI standard are limited to differences in legal structures between the US and Canada, and between states and provinces in the US and Canada. In cases where stakeholders conclude that local legal structures are insufficient (e.g. some US states may have insufficient best management practices) there should be a mechanism to address that variance of rigor of the standard.

6.The SFI standard should greatly reduce the currently accepted average clearcut size of 120 acres. Allowing clearcuts of 120 acres average (i.e. with the potential for individual clearcuts to greatly exceed 120 acres) across the US and Canada is contrary to widely-held environmental and social values. There may be very rare cases in which this size clearcut is acceptable; however, for most of the US and Canada, experts from leading environmental and social organizations would not agree this is an acceptable practice for forest management.

7.The SFI standard should require additional public access to key components of management and monitoring. Currently there is only a requirement for a public report that summarizes audit findings. To ensure transparency and credibility of the system, other key components should be made public including summaries of the management plan and monitoring. The public summaries of the management plan must include all primary elements.

8.The SFI standard should adequately address additional factors that represent responsible forest management and that are currently absent in the standard. These are not elaborated on in commentary, but include: inclusion of localized considerations for rare, threatened, and endangered species; inclusion of localized preferences for some silvicultural systems (e.g. requirements of green tree and native vegetation retention in even-aged management in the Lake States and Northeast regions and discouragement of even-aged management on the Pacific Coast); regulation of pesticide use above and beyond what is legally available; and requirements for restoration of natural forest systems in certified plantations.

- END -

(End: Columns TEMPORARILY MERGED TO ACCOMMODATE LONG, SINGLE-COLUMN RESPONSE)

[Name Omitted] requested that **[Name Omitted]** submit detailed comments on principles, process and definitions within the SFI standard on behalf of **[Name Omitted]** & **[Name Omitted]** (**[Name Omitted]**'s partnership with **[Name Omitted]**, **[Name Omitted]** and **[Name Omitted]**).

In principle, **[Name Omitted]** agrees with all recommendations made by **[Name Omitted]** with particular support for new proposed language as detailed below:

Objective 4, Performance measure 4.1:
 - Maintain, enhance, or restore the range of natural plant communities and associated development stages that are characteristic of the forest.
 - Identify and map High Conservation Value Forests across the ownership or management unit.
 - Describe in management planning documents the measures necessary to ensure the maintenance and/or enhancement of all high conservation values present in all identified HCVF areas, including the precautions required to avoid risks or impacts to such values. Actively implement and monitor these measures.

Objective 8, Performance Measure 8.1:
- Implement a Program to monitor the results of communications efforts and incorporate results to improve procurement program activities.

Objective 8, Performance Measure 8.3:
- Implement a Program to ensure that harvests of purchased stumpage do not come from sites associated with imperiled and vulnerable species and ecological communities.

Objective 8, Performance Measure 8.5:
- Written policy that ensures that material outside the United States and Canada does not come from areas that have been logged illegally.
- Implement a Program with suppliers to promote the principles of sustainable forestry and require legal wood

Objective 12, Performance Measure 12.1:
- Incorporate the results of these efforts in planning and management activities.

Definitions:

- High Conservation Value Forests
 - a) Forest areas containing globally, regionally or nationally significant:
 - i. concentrations of biodiversity values (e.g., endemism, endangered species, refugia); and/or
 - ii. large landscape level forests, contained within, or containing the management unit, where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance
 - b) Forest areas that are in or contain rare, threatened or endangered ecosystems
 - c) Forest areas that provide basic services of nature in critical situations (e.g., watershed protection, erosion control)
 - d) Forest areas fundamental to meeting basic needs of local communities (e.g., subsistence, health) and/or critical to local communities' traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities).

- Illegal logging: When timber is harvested or traded in violation of relevant national or sub-national laws or where access to forest resources or trade in forest products is authorized through corrupt practices.

	<p>Audit Report: - audit findings and conclusions, including findings of conformance, non-conformances, and corrective action plans</p>
<p>The use of the wording SFIS to refer to the standards is awkward. SFI is a word by adding the S it becomes hard to relate to. In some cases the standards say SFI standard, in other cases the use of SFI followed by the objective would be easier to read and understand.</p>	<p>Take of the "S" when used as SFIS it loses meaning, use the word SFI Standard, or lose the word standard all together.</p>
<p>General Comments</p> <ul style="list-style-type: none"> •Maintain the existing structure of the SFI Standard; land management objectives coupled with procurement system objectives. Splitting the standard could result in the loss of PEFC endorsement for the procurement portion as a stand-alone standard and would add more complexity to the audit process. •SFI Inc. should evaluate each proposed addition/change to ensure that the proposed edit adds significant value over cost and is clearly auditable. The current standard is working very well, withstanding criticism, and can be implemented at an acceptable cost. Each proposed change can add additional work and cost to participating organizations and SICs. <p>Specific Comments</p> <ul style="list-style-type: none"> •4.1.3 – Continue to focus protection needs on G1/G2 species and communities. Avoid consideration of S1/S2 species and communities. Species and community survey data is often incomplete or weak within a state and generates several S1/S2 calls with validity questioned even by the state agencies. •8.1 – Promote no change. The proposed requirements for mandatory BMP’s for indirect suppliers in voluntary BMP States should be avoided. The standard should not be more restrictive than State resource law and regulation. •8.4.1 – Drop the requirement for reforestation monitoring. •9.2.1 – Drop regeneration assessments. •12.2.3 – Drop recreational opportunities for the public where consistent with forest management objectives. This does not belong in objective 12 (procurement). More appropriate for land owners. 	<p>General Comments</p> <ul style="list-style-type: none"> •Maintain the existing structure of the SFI Standard; land management objectives coupled with procurement system objectives. Splitting the standard could result in the loss of PEFC endorsement for the procurement portion as a stand-alone standard and would add more complexity to the audit process. •SFI Inc. should evaluate each proposed addition/change to ensure that the proposed edit adds significant value over cost and is clearly auditable. The current standard is working very well, withstanding criticism, and can be implemented at an acceptable cost. Each proposed change can add additional work and cost to participating organizations and SICs. <p>Specific Comments</p> <ul style="list-style-type: none"> •4.1.3 – Continue to focus protection needs on G1/G2 species and communities. Avoid consideration of S1/S2 species and communities. Species and community survey data is often incomplete or weak within a state and generates several S1/S2 calls with validity questioned even by the state agencies. •8.1 – Promote no change. The proposed requirements for mandatory BMP’s for indirect suppliers in voluntary BMP States should be avoided. The standard should not be more restrictive than State resource law and regulation. •8.4.1 – Drop the requirement for reforestation monitoring. •9.2.1 – Drop regeneration assessments. •12.2.3 – Drop recreational opportunities for the public where consistent with forest management objectives. This does not belong in objective 12 (procurement). More appropriate for land owners.
<p>There is an opportunity for SFI to gain significant visibility in the marketplace now because FSC has tightened its rules (esp. CoC) to the point where</p>	

<p>many of our customers can no longer use the logo and are now switching to SFI and PEFC certified paper and label use.</p> <p>1 - Please make sure you retain flexibility in your CoC standard so that catalog / magazine producers, and printers can easily use the logo. For example, the logo must be usable even if paper stocks are coming from different suppliers. Catalogs and magazines are typically made of paper from different mills that may have different certification systems and CoC certification. [Name Omitted] requires all paper stock in a publication to have [Name Omitted] and this is almost impossible to achieve. [Name Omitted] at [Name Omitted] is a good person to talk to for examples of the nightmare this is causing at the printer level.</p> <p>2- Please make your SFI CoC standard fully compatible and accepted by PEFC. This mutual recognition is important because it will give you more visibility via logo use and also avoid much confusion in the marketplace. SFI and PEFC should be fully compatible in all aspects.</p> <p>3-Spend more time with paper suppliers, brokers and printers to make sure they understand your system, esp. CoC and logo use. We are in front of major customers everyday who can decide to use your logo and give you instant "fame". Just imagine if Name Omitted, and Name Omitted decided to label their catalogs or magazines with SFI...We spend a lot of time with these paper buyers and we can help sell your brand.</p> <p>4- I will email our recent comments on the PEFC standard in a separate email.</p>	
----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--

DEFINITIONS

The following definitions apply to italicized words in the SFI Standard and the Audit Procedures and Qualifications.

afforestation The establishment of a forest or stand in an area where the preceding vegetation or land use was not forest.

Rationale for proposed change:

Proposed New Language:

American Tree Farm System® A national program that promotes the sustainable management of forests through education and outreach to private forest landowners.	
Rationale for proposed change:	Proposed New Language:
aquatic fauna Animals that live on or within water during some stage of their development.	
Rationale for proposed change:	Proposed New Language:
Dispersal is also a function supported by aquatic habitats.	An area where water is the principal medium and that provides the resources and environmental conditions to support occupancy, survival, reproduction, and dispersal by individuals of a given species.
artificial regeneration The establishment of a group or stand of young trees created by direct seeding or by planting seedlings or plantlets.	
Rationale for proposed change:	Proposed New Language:
available regulatory action information Statistics or regulatory compliance data collected by a federal, state, or local government agency. Note: Although conformance with laws is the intent, auditors are directed to look for a spirit and general record of compliance rather than isolated or unusual instances of deviation.	
Rationale for proposed change:	Proposed New Language:
need to include provinces	change "federal, provincial, state"
The "Note" in this definition provides a loophole for Program Participants not to comply with all laws. There is no basis for allowing illegal activities.	Statistics or regulatory compliance data collected by a federal, state, or local government agency.
auditor A person with the competence to conduct an audit (ISO 19011:2002, 3.8).	
Rationale for proposed change:	Proposed New Language:
ISO 9000: Quality Management Systems-Fundamentals and vocabulary	ISO 9000, 3.9.9
"Competence" needs to be more explicitly defined relative to this context.	A person with the forestry and ecological expertise to conduct an audit (ISO 19011:2002, 3.8).
audit firm A firm qualified to conduct a certification audit to the SFI Standard according to the standards of ISO 19011 and SFI APQ.	
Rationale for proposed change:	Proposed New Language:
ISO/IEC 17000-Conformity Assessment-Vocabulary and general principles	Use ISO 9000 and 17000 terminology whenever possible
ISO/IEC 17011-Conformity Assessment-General requirements for accreditation bodies accrediting	

conformity assessment bodies	
<p>audit team One or more auditors conducting an audit, supported if needed by technical experts (ISO 19011:2002, 3.9).</p>	
Rationale for proposed change:	Proposed New Language:
ISO 9000: Quality Management Systems-Fundamentals and vocabulary	Use ISO 9000 and 17000 terminology whenever possible
<p>best management practices (BMPs) A practice or combination of practices that is determined by a federal, provincial, state, or local government or other responsible entity, after problem assessment, examination of alternative practices, and appropriate public participation, to be the most effective and practicable (including technological, economic, and institutional considerations) means of conducting a forest management operation while addressing any environmental considerations.</p>	
Rationale for proposed change:	Proposed New Language:
Social considerations need to be in here, especially if you are concerned about sensitive sites from a cultural standpoint.	Change end to “environment and social considerations”
<p>best scientific information available factual information that is generally accepted by the broad scientific community, including but not limited to peer-reviewed scientific information obtainable from any source, including government and nongovernmental sources, that has been verified by field testing to the maximum extent feasible.</p>	
Rationale for proposed change:	Proposed New Language:
The existing definition of best scientific information is not specific enough to ensure that the highest quality (or best) science is given the most weight over other types of science and information in managing for sustainable forests.	Scientific information that results from a valid scientific process, which includes: critical peer review by qualified scientific experts in that scientific discipline; replicable, accepted methods; rigorous statistical analysis; reasonable inferences; logical conclusions; and placement in the proper context of the prevailing body of pertinent science. Examples include (in order from best to worst information in terms of reliability and rigor) peer-reviewed literature (refereed journal articles), gray literature (agency reports), expert opinion (university and government scientists), and anecdotal evidence (public testimony or traditional ecological knowledge).
<p>biodiversity hotspots A biogeographic conservation region with more than 1,500 endemic plant species and less than 30 percent of its historical extent. (See Descriptions of Biodiversity Hotspots and Major Tropical Wilderness Areas with Guidance to SFI Program Participants on Their Relation to the SFIS, available at www.aboutsfb.org.)</p>	
Rationale for proposed change:	Proposed New Language:
The use of the term 'hotspot' has very different meanings in biology vs. the guidance document provided.	[No Comment]
We could not find the “Descriptions of Biodiversity Hotspots...” at the URL in this definition, but rather found it at:	A biogeographic conservation region with more than 1,500 endemic plant species and less than 30 percent of its historical extent. (See 2005-2009 SFIS Guidance

<p>http://www.sfiprogram.org/miscPDFs/2005-09SFISGuidance.pdf</p>	<p>Document, available at http://www.sfiprogram.org/miscPDFs/2005-09SFISGuidance.pdf.</p>
--------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------

biological diversity, biodiversity The variety and abundance of life forms, processes, functions, and structures of plants, animals, and other living organisms, including the relative complexity of species, communities, gene pools, and ecosystems at spatial scales that range from local to regional to global.

Rationale for proposed change:	Proposed New Language:
<p>Definition is completely static - biological systems are not. Invasive species and introduced species *can* measurably increase species richness through their addition to total counts of species and are not particularly desirable. The temporal aspect and native varieties of species needs to be worked in.</p>	<p>"The natural and historical range in the variety and abundance of life forms..."</p>
<p>A narrower definition is needed. I do not have access at the moment to the definition used in the Eastside Regional Forest Management Plan issued by the USFS about 10 years ago, but would recommend substituting that.</p>	<p>Use def. from Eastside Management Plan, USFS.</p>

biotechnology The application of biological engineering at the cellular and molecular level.

Rationale for proposed change:	Proposed New Language:
<p>Given recent advances in this field, the present definition is merely useless, and at its very best misleading. Is flying of seed from US to Chile for propagation "biological engineering?" Is micro-injection of genetic sequences? Is variable genetic sequencing? This is basically meaningless.</p>	<p>Omit definition, or find one more specific to forestry.</p>

conservation 1. Protection of plant and animal habitat. 2. The management of a renewable natural resource with the objective of sustaining its productivity in perpetuity while providing for human use compatible with sustainability of the resource.

Rationale for proposed change:	Proposed New Language:
<ul style="list-style-type: none"> Ecological processes must be protected in order to conserve functional habitats. Part 2 is a definition of "sustainable use" which does not equal and should not be included with this definition for "conservation". 	<p>Protection of plant and animal habitat and its essential ecological processes.</p>

critically imperiled Globally extremely rare or, because of some factor(s), especially vulnerable to extinction. Typically, five or fewer occurrences or populations remain, or very few individuals (Guidance Document for Biodiversity Hotspots, Major Tropical Wilderness Areas and Forests With Exceptional Conservation Value available at www.abouthsf.org.)

Rationale for proposed change:	Proposed New Language:
<p>Note - rationale for new definition listed below. I have placed it here because there is no space provided for new definitions.</p>	<p>Rare: species or natural communities listed as G3, S1, S2 or S3 in NatureServe, state Natural Heritage Program, or other biodiversity databases.</p>

<p>This definition complements proposed revisions to indicators under Performance Measures 4.1 and 4.2.</p>	
<p>We could not find the “Guidance Document for Biodiversity Hotspots...” at the URL in this definition, but rather found it at: http://www.sfiprogram.org/miscPDFs/2005-09SFISGuidance.pdf</p>	<p>Globally extremely rare or, because of some factor(s), especially vulnerable to extinction. Typically, five or fewer occurrences or populations remain, or very few individuals (<1,000), acres (<2,000), or linear miles (<10) exist. Often referred to as G1. (See 2005-2009 SFIS Guidance Document, available at http://www.sfiprogram.org/miscPDFs/2005-09SFISGuidance.pdf).</p>

culturally important Significant because of an association with indigenous peoples (e.g., Native Americans or First Nations).

Rationale for proposed change:	Proposed New Language:
<p>While this is a major intent this needs to be broadened to cover culturally significant sites for others as well. It would be an insult to infer that only Native Americans and First Nations have culturally important sites on forest lands.</p>	<p>[No Comment]</p>

degree A professional academic degree (e.g., bachelor’s) or equivalent.

Rationale for proposed change:	Proposed New Language:
<p>The equivalent of an academic degree must be defined objectively, as it is for SFI Audit Team members.</p>	<p>A professional academic degree (e.g., bachelor’s) or equivalent (minimum of five years’ work experience).</p>
<p>many developing countries such as Fiji have developed excellent two year degree programs in forestry. As SFI goes global these programs both here and abroad will form the back bone of the field professionals implementing SFI, somewhere these need to be addressed as legitimate degree programs</p>	<p>Degree a professional academic degree from either a two year, four year, or equivalent.</p>

direct supplier A procurement source with whom a Program Participant has a direct contractual relationship.

Rationale for proposed change:	Proposed New Language:
<p>ISO 9000 QMS vocabulary ISO/IEC 17000-Conformity Assessment-Vocabulary and general principles</p>	<p>Use ISO 9000 and 17000 terminology whenever possible</p>

economic viability The economic incentive necessary to keep forest ownerships profitable and competitive and to keep people gainfully employed.

Rationale for proposed change:	Proposed New Language:

exotic tree species A tree species introduced from outside its natural range, excluding species that have become “naturalized” in the area and have a naturally reproducing population. (Note: Hybrids of

native species or native plants that have been derived from genetic tree improvement and biotechnology programs are not considered exotic species.)	
Rationale for proposed change:	Proposed New Language:
Only native species are non-exotic, which does not include "naturalized" or hybrid species.	A non-native tree species introduced from outside its natural range.
first-party verification Verification of an organization's performance conducted from within the organization by qualified individuals who are not accountable to those directly responsible for the subject matter being verified. Also called self-verification.	
Rationale for proposed change:	Proposed New Language:
ISO/IEC 17000-Conformity Assessment-Vocabulary and general principles	Use ISO 9000 and 17000 terminology whenever possible
forest health The perceived condition of a forest derived from concerns about such factors as its age, structure, composition, function, vigor, presence of unusual levels of insects or disease, and resilience to disturbance.	
Rationale for proposed change:	Proposed New Language:
forestry The profession embracing the science, art, and practice of creating, managing, using, and conserving forests and associated resources for human benefit and in a sustainable manner to meet desired goals, needs, and values.	
Rationale for proposed change:	Proposed New Language:
forestry enterprise A business engaged in the management of forestland, having its own functions and administration and comprising one or more operating units.	
Rationale for proposed change:	Proposed New Language:
geographic information system (GIS) An organized collection of computer systems, personnel, knowledge, and procedures designed to capture, store, update, manipulate, analyze, report, and display forms of geographically referenced information and descriptive information.	
Rationale for proposed change:	Proposed New Language:
green-up requirement Previously clearcut harvest areas must have trees at least 3 years old or 5 feet high at the desired level of stocking before adjacent areas are clearcut.	
Rationale for proposed change:	Proposed New Language:
<ul style="list-style-type: none"> • Age not a uniform indicator among species or regions. • Five feet is not high enough to prevent visual impacts • The desired level of stocking is too subjective 	Previously clearcut harvest areas must have trees at least 10 feet high or reach canopy closure before adjacent areas are clearcut.

whereas canopy closure can be measured directly.	
growing stock All the trees growing in a forest or in a specified part of it, meeting specified standards of size, quality and vigor, and generally expressed in terms of number or volume.	
Rationale for proposed change:	Proposed New Language:
growth-and-yield model A set of relationships, usually expressed as equations and embodied in a computer program or tables, that provides estimates of future stand development given initial stand conditions and a specified management regime.	
Rationale for proposed change:	Proposed New Language:
The USFS SPECTRUM model, probably the most ambitious of these, has unexplainable results, and consistently fails to recreate conditions a measured by the FIA surveys. Any modeling should be for interest only, and not normative.	ADD: after A set of, the word "hypothetical"
growth and drain The average annual net increase in the volume of trees during the period between inventories (including the increment in net volume of trees at the beginning of the specific year surviving to its end, plus the net volume of trees reaching the minimum size class during the year, minus the volume of trees that died during the year, and minus the net volume of trees that became cull trees during the year) minus the net volume of growing stock trees removed from the inventory during a specified year by harvesting, cultural operations such as timber stand improvement, or land clearing. From Smith, W. Brad, Patrick D. Miles, John S. Vissage, and Scott A. Pugh. 2003. Forest Resources of the United States, 2002. General Technical Report NC-241. St. Paul, MN: USDA Forest Service, North Central Research Station.	
Rationale for proposed change:	Proposed New Language:
habitat 1. A unit area of environment. 2. The place, natural or otherwise (including climate, food, cover, and water) where an individual or population of animals or plants naturally or normally lives and develops.	
Rationale for proposed change:	Proposed New Language:
<ul style="list-style-type: none"> • In Part 1 of this definition, habitat occupies an area, but is not itself a standardized unit of measurement. Instead, change "place" to "area" in Part 2 and delete Part 1. • Survival, reproduction, and dispersal specifically are the three essential processes of populations that must be supported by habitat. 	The area, natural or otherwise (including climate, food, cover, and water) where an individual or population of animals or plants naturally or normally survives, reproduces, and disperses.
illegal logging Theft of timber or logs and cutting in parks, reserves, or other similar areas where otherwise precluded by law.	
Rationale for proposed change:	Proposed New Language:
Illegal logging is more than just harvesting timber from areas where it should not be cut. Illegal logging	illegal logging - Theft of timber or logs and cutting in parks, reserves, or other similar areas where otherwise

<p>should include any act or activity that is against any law governing the practice of timber harvesting and transportation, including, but not limited to cutting without a contract where required, not adhering to insurance requirements as mandated by State regulations, transporting loads that exceed legal weight limits on both federal and state highways, not adhering to labor laws, etc.</p>	<p>prohibited by law; non-compliance with local, regional, state or national ordinances regulating the harvesting, transportation and/or sale of timber.</p>
<p>Current definition is far too limited -- currently does not address important aspects of illegal logging.</p>	<p>When timber is harvested or traded in violation of relevant national or sub-national laws or where access to forest resources or trade in forest products is authorized through corrupt practices.</p>

imperiled A plant or animal or community, often referred to as G2, that is globally rare or, because of some factor(s), is very vulnerable to extinction or elimination. Typically, six to 20 occurrences, or few remaining individuals (1,000 to 3,000), or acres (2,000 to 10,000), or linear miles (10 to 50) exist. (See Guidance Document for Biodiversity Hotspots, Major Tropical Wilderness Areas and Forests With Exceptional Conservation Value, available at www.aboutsfb.org.)

Rationale for proposed change:	Proposed New Language:
<p>We could not find the "Guidance Document for Biodiversity Hotspots..." at the URL in this definition, but rather found it at: http://www.natureserve.org/explorer/ranking.htm#assessment</p>	<p>A plant or animal or community, often referred to as G2, that is globally rare or, because of some factor(s), is very vulnerable to extinction or elimination. Typically, six to 20 occurrences, or few remaining individuals (1,000 to 3,000), acres (2,000 to 10,000), or linear miles (10 to 50) exist. (See 2005-2009 SFIS Guidance Document, available at http://www.sfiprogram.org/miscPDFs/2005-09SFISGuidance.pdf).</p>

improved planting stock Products of tree improvement programs in which the parent trees were selected through Mendelian crosses for increased growth, pest resistance, or other desirable characteristics.

Rationale for proposed change:	Proposed New Language:

indicator In the SFI Program, a specific metric, integral to conformance with the SFI Standard, that provides information about an organization's forestry and environmental performance and is used to assess conformance to the SFI Standard objectives and performance measures.

Rationale for proposed change:	Proposed New Language:
<p>Remove redundant language to increase clarity.</p>	<p>In the SFI Program, a specific metric that provides information about an organization's forestry and environmental performance and that is integral to assessing conformance to the SFI Standard objectives and performance measures.</p>
<p>a good example where saying SFI Standard is a far better way of describing things than using SFIS</p>	<p>no changes in how it is written</p>

<p>inventory 1. A set of objective sampling methods that quantify the spatial distribution, composition, and rates of change of forest parameters within specified levels of precision for management purposes. 2. The listing of data from such a survey.</p>	
<p>Rationale for proposed change:</p> <p>Forest inventory vs. other inventories is not clearly distinguished (soil inventory is mentioned in the above as are inventory systems). The definition more often now refers to the spatial data used in an inventory GIS layer.</p>	<p>Proposed New Language:</p> <p>Add: "3. A spatial layer used in forest resource planning that contains the spatial occurrences of data from such as survey."</p>
<p>An estimate of abundance is also an essential component of any inventory.</p>	<p>1. A set of objective sampling methods that quantify the spatial distribution, composition, abundance, and rates of change of forest parameters within specified levels of precision for management purposes. 2. The listing of data from such a survey.</p>
<p>integrated pest management The maintenance of destructive agents, including insects at tolerable levels, by the planned use of a variety of preventive, suppressive, or regulatory tactics and strategies that are ecologically and economically efficient and socially acceptable.</p>	
<p>Rationale for proposed change:</p> <p>Integrated pest management must also be environmentally responsible to avoid unintended negative consequences of its use.</p>	<p>Proposed New Language:</p> <p>The maintenance of destructive agents, including insects at tolerable levels, by the planned use of a variety of preventive, suppressive, or regulatory tactics and strategies that are ecologically and economically efficient, socially acceptable, and environmentally responsible.</p>
<p>land classification The process of generating and applying land strata that are sufficiently homogeneous in their physical, vegetative, and development attributes.</p>	
<p>Rationale for proposed change:</p> <p>"Generating and applying land strata" is a confusing description.</p>	<p>Proposed New Language:</p> <p>The process of designating areas of land into classes or strata that are sufficiently homogeneous in their physical, vegetative, and development attributes.</p>
<p>landscape 1. A spatial mosaic of several ecosystems, landforms, and plant communities across a defined area irrespective of ownership or other artificial boundaries and repeated in similar form throughout. 2. An area of land characterized by similar biogeoclimatic conditions that influence site potential; similar historical disturbance regimes that influence vegetation structure and species composition; and sufficient size to provide the range of habitat conditions for naturally occurring communities (except for a few megafauna with large spatial needs, e.g. wolves).</p>	
<p>Rationale for proposed change:</p> <p>It is strange that large megafauna are singled out in the definition as not relevant to a landscape. In sustainable wildlife management megafauna are often the indicator species used in determining the viability of a landscape for conservation purposes.</p>	<p>Proposed New Language:</p> <p>Drop the existing example</p>
<ul style="list-style-type: none"> • The component patches within landscapes interact by definition. • We think the intent here is to describe a "naturally" defined area. 	<p>1. A spatial mosaic of interacting ecosystems, landforms, and plant communities across a naturally defined area irrespective of ownership or other artificial boundaries. 2. An area of land characterized by</p>

<ul style="list-style-type: none"> Landscapes are actually heterogeneous areas and are not necessarily “repeated in similar form throughout”. Ecological structure and function go hand-in-hand. 	<ul style="list-style-type: none"> a. similar biogeoclimatic conditions that influence site potential; b. similar historical disturbance regimes that influence vegetative structure, species composition, and ecological function; and c. sufficient size to provide the range of habitat conditions for naturally occurring communities (except for a few megafauna with large spatial needs, e.g. wolves).
<p>This also should be taken from the Eastside Management Plan USFS</p>	<p>Take definition from USFS Eastside Plan.</p>

lead auditor An auditor appointed to lead an audit team. Also referred to as an audit team leader (ISO 19011:2002, 3.9, note 1).

Rationale for proposed change:	Proposed New Language:
ISO 9000-Quality Management Systems-fundamentals and vocabulary	Use ISO 9000 and 17000 terminology whenever possible

least-toxic and narrowest-spectrum pesticide A chemical preparation used to control site-specific pests that minimizes impact to nontarget organisms and causes the least impact to the site while meeting management objectives. The management objectives should consider the target pest, the degree of control needed, cost, and other issues, such as season and timing of application, rates and methods, terrain, forest conditions, and the presence or absence of water bodies.

Rationale for proposed change:	Proposed New Language:

licensee A company, organization, or individual that participates in the SFI Program through a contractual agreement to abide by the SFI Standard principles and objectives. A licensee is one type of Program Participant.

Rationale for proposed change:	Proposed New Language:
<p>Monitoring the use of the SFI certification mark.</p> <p>Licensee- SFI licenses certification body Sublicensee- certification body issues SFI sublicense to supplier of the certified product</p>	<p>SFI shall sign a license agreement with the certification body which permits the CB to sign a sublicense agreement with the certified supplier to use the SFI mark on the product/correspondence in conformance with SFI rules and regulations.</p>

major tropical wilderness areas The world’s largest-remaining tracts of tropical forest that are more than 75 percent intact. These areas are characterized by extraordinary biological richness, including exceptional concentrations of endemic species, and are also of crucial importance to climate regulation, watershed protection, and maintenance of traditional indigenous lifestyles. (See Descriptions of Biodiversity Hotspots and Major Tropical Wilderness Areas with Guidance to SFI Program Participants on Their Relation to the SFIS, available at www.aboutsfb.org.)

Rationale for proposed change:	Proposed New Language:
<ul style="list-style-type: none"> Listing the three major tropical wilderness areas is useful here. We could not find the “Descriptions of Biodiversity Hotspots...” at the URL in this definition, but rather found it at: 	<p>The world’s largest-remaining tracts of tropical forest that are more than 75 percent intact, which include the Upper Amazonia/Guyana Shield, the Congo Basin, and the New Guinea/Melanesian Islands. These areas are characterized by extraordinary</p>

<p>http://www.sfiprogram.org/miscPDFs/2005-09SFISGuidance.pdf.</p>	<p>biological richness, including exceptional concentrations of endemic species, and are also of crucial importance to climate regulation, watershed protection, and maintenance of traditional indigenous lifestyles. (See 2005-2009 SFIS Guidance Document, available at http://www.sfiprogram.org/miscPDFs/2005-09SFISGuidance.pdf).</p>
---------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

management responsibilities on public lands Accountability for developing plans and translating public agencies' missions, goals, and objectives to an organized set of actions.

Rationale for proposed change:	Proposed New Language:

minimize To do only that which is necessary and appropriate to accomplish the task or objective described.

Rationale for proposed change:	Proposed New Language:
Further clarification "to the least extent or amount" is helpful in making the meaning explicit.	To do only that which is necessary and appropriate to the least extent or amount to accomplish the task or objective described.
Without consideration of whether or not a practice or its alternative(s) is economically feasible, minimize suggests absolute reduction everytime. We don't believe this is the intent, but without consideration of economic feasibility, auditors are treating it as such.	To do only that which is necessary, appropriate, and economically feasible to accomplish the task or objective described.

major nonconformance One or more of the SFIS performance measures or indicators has not been addressed or has not been implemented to the extent that a systematic failure of a Program Participant's SFI system to meet an SFI objective, performance measure or indicator occurs.

Rationale for proposed change:	Proposed New Language:
ISO 9000: Quality Management Systems-Fundamentals and vocabulary	ISO 9000, 3.6.2 Use nonconformity in place of nonconformance
a good example where using the abbreviation SFIS makes reading the intent more difficult	change wording to read SFI Standard

minor nonconformance An isolated lapse in SFIS program implementation which does not indicate a systematic failure to consistently meet an SFI objective, performance measure or indicator.

Rationale for proposed change:	Proposed New Language:
ISO 9000: Quality Management Systems-Fundamentals and vocabulary	ISO 9000, 3.6.2 Use nonconformity in place of nonconformance
see above	see above

natural regeneration The establishment of a plant or a plant age class from natural seeding, sprouting, suckering, or layering.

Rationale for proposed change:	Proposed New Language:
--------------------------------	------------------------

<p>nonforested wetland A transitional area between aquatic and terrestrial ecosystems that does not support tree cover and is inundated or saturated for periods long enough to produce hydric soils and support hydrophytic vegetation.</p>	
Rationale for proposed change:	Proposed New Language:
<p>objective In the SFI Program, a fundamental goal of sustainable forest management as embodied in objectives 1–13 of the SFI Standard.</p>	
Rationale for proposed change:	Proposed New Language:
<p>old-growth forests A forested ecosystem distinguished by old trees and related structural attributes, such as tree size, down woody debris, canopy levels, and species composition. Program Participants should utilize a definition specific to their region and particular forest types.</p>	
Rationale for proposed change:	Proposed New Language:
Suggest we change from old growth to late succession	
<p>Conservation of "old-growth" forests originates in the forest management controversy in the wet forests of OR, WA, BC and AK and implies landscapes that contain forests of age and species/structural composition from pre-European settlement era (regardless of how SFI chooses to define it this term). This does not fit well with older forest conservation in regions where little "original" forest exists and where "unmanaged" forest types have been significantly altered in species and structural composition by landscape-wide fire suppression. Suggest committee clearly describe the intent of Indicator 4.1.6 (and any other references to this definition) and have an ecologist choose terminology and accompanying definition that meets this intent and is also universally applicable to all regions of SFI implementation.</p>	[No Comment]
<p>Further clarifications are helpful here.</p>	<p>Forested ecosystems that have never been harvested and are distinguished by very old trees and related structural attributes, such as large tree size, abundant down woody debris, multiple canopy levels, and unique species composition. Program Participants should utilize a definition specific to their region and particular forest types.</p>
<p>This should be eliminated, because it is incapable of definition. Most writings on the subject confuse size of trees with age, meaning that management of vigorously growing stands can be severely compromised.</p>	<p>OMIT: tree size -- or preferably, the entire heading.</p>

<p>other wood supplier A person who infrequently supplies wood fiber on a small scale. Examples include farmers and small-scale land-clearing operators.</p>	
Rationale for proposed change:	Proposed New Language:
other wood supplier definition is not in context without a definition of "wood supplier", see proposed new language for suggested wood supplier definition	new definition for wood supplier: Wood supplier: A person or organization that enters into a direct contract/agreement with a Program Participant for the sale and delivery of certain quantities of wood. A wood supplier may also be the wood producer but the wood producer is not a wood supplier without the direct contract/agreement with The Program Participant.
Other wood supplier: Remain consistent with "wood producer" definition. Forest contracting, management, and operations are typically accomplished via a team of employees, contractors, subcontractors and other firms. To explicitly limit this definition to an individual "person" or employee is both unrealistic and irrational--and excludes entities such as corporations or LLC.	Other wood supplier: Change to: "Other wood producer: A person or organization who infrequently..."
do you mean other wood supplier or non professional logger, we require that all suppliers meet the SFI training requirements and so by default they are professional loggers	non professional logger; a person ..
<p>performance measure In the SFI Program, a means of judging whether an objective has been fulfilled.</p>	
Rationale for proposed change:	Proposed New Language:
<p>policy A written statement of commitment to meet an objective or to implement a defined program or plan to achieve an objective or outcome.</p>	
Rationale for proposed change:	Proposed New Language:
<p>principle In the SFI Program, the vision and direction for sustainable forest management as embodied in principles 1–9 of the SFI Standard.</p>	
Rationale for proposed change:	Proposed New Language:
Extra clarification is useful here.	In the SFI Program, the fundamental vision and direction for sustainable forest management as embodied in principles 1–9 of the SFI Standard and all subsequent Objectives, Performance Measures, and Indicators.
<p>procurement Acquisition of roundwood (sawlogs or pulpwood) and field-manufactured or primary-mill residual chips, pulp, and veneer to support a forest products manufacturing facility.</p>	
Rationale for proposed change:	Proposed New Language:

<p>What about to support a power generating facility? Procurement can apply regardless of facility type. Right? It might not be a forest products manufacturing facility as we think of it today. Also, the term "acquisition" is semantically very limited and does not express the full range of activities within procurement. Wood procurement can include: acquiring, securing,(from fraud and theft), harvesting, delivering, storing, and handling at inventory locations which many times are remote to mills, and sometimes conversion prior to mill consumption such as chipmill processing</p>	<p>All the operations (and associated environmental impacts) beginning with the purchase until final manufacturing. Elements can include: timber evaluation, security, felling, forwarding, loading, transportation, sorting, storing and conveying at inventory locations plus partial conversion such as chipping at remote facilities prior to end product conversion (i.e. pulping, sawmilling)</p>
<p>For clarification</p>	<p>"Procurement." The operations of an organization responsible for the purchase and delivery of wood to a manufacturing facility regardless of purchase and delivered form (i.e. roundwood, chips, veneer). Elements of procurement can include: timber evaluation, purchase, security, access, felling, forwarding, loading, transportation, plus the sorting, storing and conveying at inventory locations and additionally any preliminary conversion at remote facilities (i.e. chipmill) prior to end-product manufacturing (i.e. pulping, sawmilling, formng).</p>
<p>This definition should be written so that direct vs. indirect sources are distinguished. It is interesting to note that the Definitions section does contain a definition for "direct supplier" but not one for "indirect supplier." But, even so, an indirect supplier is not the same thing as an indirect source.</p>	<p>Add, "Squisition may be by way of a direct supplier or an indirect supplier."</p>

productivity The inherent capacity of a particular site or ecosystem to produce a crop or tree stand, often measured in volume or height.

Rationale for proposed change:	Proposed New Language:
<p>The term "crop" should be either qualified as "timber crop" or removed. I suggest the latter.</p>	<p>productivity [italics] The inherent capacity of a particular site or ecosystem to produce a tree stand, often measured in volume or height.</p>
<p>Tree stands should not be referred to as "crops" because this implies "plantation" forestry which is not a sustainable practice.</p>	<p>The inherent capacity of a particular site or ecosystem to produce a tree stand, often measured in volume or height.</p>

program An organized system, process, or set of activities to achieve an objective or performance measure.

Rationale for proposed change:	Proposed New Language:

Program Participant A member of AF&PA or a licensee of the SFI Program.

Rationale for proposed change:	Proposed New Language:
<p>Remove connection to AF&PA (no longer</p>	<p>An organization in conformance with all portions of</p>

accurate). AF&PA will allow members to be certified to CSA or FSC instead of just SFI.	the SFIS relevant to their operations.
ISO 9000-Quality Management Systems-fundamentals and vocabulary	Use ISO 9000 and 17000 terminology whenever possible
ISO 17000-conformity assessment-vocabulary and general principles	
The definition is obsolete and should be modified by SFI, Inc.	[No Comment]

protection Maintenance of the status or integrity, over the long-term, of identified attributes or values including management where appropriate and giving consideration to historical disturbance patterns, fire risk and forest health when determining appropriate conservation strategies.

Rationale for proposed change:	Proposed New Language:
It is important to maintain ecological functions, values, and processes specifically.	Long-term maintenance of the status or integrity of ecological functions, values, and processes, which includes management where appropriate and consideration of historical disturbance patterns, fire risk, and forest health when determining appropriate conservation strategies.

public land Land enrolled in the SFI Program that is owned or administratively managed by a government entity (federal, state, provincial, or local), excluding easements or other encumbrances held by a government entity on private land.

Rationale for proposed change:	Proposed New Language:
Public land: Tribal lands are sovereign governments. County forests are important.	Public land: Change to..(federal, state, provincial, county, tribal, local or other agency)...

purchased stumpage Procurement of roundwood directly from a landowner under a contractual agreement that gives the Program Participant the right and obligation to harvest the timber.

Rationale for proposed change:	Proposed New Language:
replace landowner with timber owner, the timber is not always purchased from the "landowner" but always directly from the party with the rights to the timber.	Roundwood purchased directly from the timber owner by contractual agreement that transfers both the harvest rights and obligations to the Program Participant.
"purchased stumpage" Roundwood purchased directly from the timber owner by contractual agreement that transfers both the harvest rights and obligations to the Program Participant.	[No Comment]

qualified logging professional A person with specialized skills in timber harvesting gained through experience or formal training who has successfully completed wood producer training programs recognized by SFI Implementation Committees as meeting the spirit and intent of performance measure under Objective 8 of the SFI Standard.

Rationale for proposed change:	Proposed New Language:
needs to include approved Master Logger Programs.	inclusion of Master Logger programs.

<p>May need to include a reference to the master laoggin gprogram here to ensure objective complaince</p>	<p>[No Comment]</p>
<p>[No Comment]</p>	<p>Add the following language to this definition: "qualified logging professional." A person with specialized skills in timber harvesting gained through experience or formal training who has successfully completed wood producer training, as outlined in Objective 10.2.1, programs recognized by SFI Implementation Committees as meeting the spirit and intent of performance measure under Objective 8 of the SFI Standard</p>
<p>Qualified logging professional: Remain consistent with "wood producer" definition. Forest contracting, management, and operations are typically accomplished via a team of employees, contractors, subcontractors and others. To explicitly limit this definition to an individual "person" or employee is both unrealistic and irrational--and excludes entities such as corporations or LLC.</p>	<p>Qualified logging professional: Change to: A person or organization with specialized skills...</p>
<p>qualified resource professional A person who by training and experience can make forest management recommendations. Examples include foresters, soil scientists, hydrologists, forest engineers, forest ecologists, fishery and wildlife biologists or technically trained specialists in such fields.</p>	
<p>Rationale for proposed change:</p>	<p>Proposed New Language:</p>
<p>Should recognize Certified Master Loggers as Qualified Resource Professionals. They have gone above and beyond the "qualified logging professional" status of simply being "trained" to actually having their operations audited by other resource professionals.</p>	<p>A person who by training and experience can make forest management recommendations, including timber harvesting operations. Examples include foresters, soil scientists, hydrologists, forest ecologists, fishery and wildlife biologists, Certified Master Loggers or technically trained specialists in such fields.</p>
<p>Qualified resource professional: Remain consistent with "wood producer" definition. Forest contracting, management, and operations are typically accomplished via a team of employees, contractors, subcontractors and others. To explicitly limit this definition to an individual "person" or employee is both unrealistic and irrational--and excludes entities such as corporations or LLC.</p>	<p>Qualified resource professional: Change to: A person or organization with specialized skills...</p>
<p>reforestation The reestablishment of forest cover either naturally or artificially.</p>	
<p>Rationale for proposed change:</p>	<p>Proposed New Language:</p>
<p></p>	<p></p>
<p>riparian Related to, living in, or located in conjunction with a wetland, on the bank of a river or stream or at the edge of a lake or tidewater.</p>	

Rationale for proposed change:	Proposed New Language:
Amend the definition of “riparian” to include the function of wildlife habitat	[No Comment]
secondary education High school education, or equivalent, preceding a college or university degree.	
Rationale for proposed change:	Proposed New Language:
silviculture The art and science of controlling the establishment, growth, composition, health, and quality of forests and woodlands to meet the diverse needs and values of landowners and society on a sustainable basis.	
Rationale for proposed change:	Proposed New Language:
skid trail A temporary path through the woods to transport felled trees or logs to a collection area for further transportation.	
Rationale for proposed change:	Proposed New Language:
note skid trails also are used to bring felled trees to areas for futher processing	finish the sentence by changing to read for "further processing and transportation"
stand A contiguous group of trees sufficiently uniform in age, composition, and structure, and growing on a site of sufficiently uniform quality, to be a distinguishable unit.	
Rationale for proposed change:	Proposed New Language:
sustainable forestry To meet the needs of the present without compromising the ability of future generations to meet their own needs by practicing a land stewardship ethic that integrates reforestation and the managing, growing, nurturing, and harvesting of trees for useful products with the conservation of soil, air and water quality, biological diversity, wildlife and aquatic habitat, recreation, and aesthetics.	
Rationale for proposed change:	Proposed New Language:
This fails to include all aspects of SFM needs to eference economic and social	[No Comment]
Some clarification makes this definition less abstract.	to meet the needs of current generations for forest products without compromising the ability of future generations to meet their own needs by practicing a land stewardship ethic that integrates reforestation and the managing, growing, nurturing, and harvesting of trees for useful products with the conservation of soil, air and water quality, biological diversity, wildlife and aquatic habitat, recreation, and aesthetics.
Mentioned previously: reforestation as a primary	OMIT: reforestation and

objective simply begs the question of how forestry proceeds in the North Eastern Hardwood Forest.	
<p>Sustainable Forestry Board (SFB) An independent multistakeholder body that manages the SFI Standard and its associated verification procedures and qualifies certification auditors.</p>	
Rationale for proposed change:	Proposed New Language:
<p>Sustainable Forestry Initiative® Program The structure, responsibilities, practices, procedures, processes, and time frames by which Program Participants implement, maintain, and improve sustainable forest management.</p>	
Rationale for proposed change:	Proposed New Language:
<p>Sustainable Forestry Initiative Standard (SFIS) The principles, policies, objectives, performance measures, and indicators that detail specific requirements for Program Participants.</p>	
Rationale for proposed change:	Proposed New Language:
<p>Sustainable Forestry Initiative Standard Audit Procedures and Qualifications (SFI APQ) The principles and guidelines that detail specific requirements to Program Participants and auditors for conducting audits to the SFI Standard.</p>	
Rationale for proposed change:	Proposed New Language:
<p>technical expert A person who provides specific knowledge or expertise to the audit team (ISO 19011 2002, 3.10).</p>	
Rationale for proposed change:	Proposed New Language:
ISO 9000-Quality Management Systems-fundamentals and vocabulary ISO 17000-conformity assessment-vocabulary and general principles	Use ISO 9000 and 17000 terminology whenever possible
tecincal experts are used by the program participant as well as by the audit team	after expertise add "to the program participant and to the audit team"
<p>third-party certification An assessment of conformance to the SFI Standard conducted according to the standards of the SFI APQ and ISO 19011 by a qualified audit firm.</p>	
Rationale for proposed change:	Proposed New Language:
ISO 9000-Quality Management Systems-fundamentals and vocabulary ISO 17000-conformity assessment-vocabulary and general principles	Use ISO 9000 and 17000 terminology whenever possible

<p>threatened and endangered Listed under the U.S. Endangered Species Act or the Canadian Species at Risk Act and listed under applicable state or provincial laws requiring protection.</p>	
<p>Rationale for proposed change:</p> <p>Improvements to wording.</p>	<p>Proposed New Language:</p> <p>Species listed under the U.S. Endangered Species Act, the Canadian Species at Risk Act, or analogous state or provincial laws requiring protection.</p>
<p>traditional forest-related knowledge Forest-related knowledge owned and maintained by indigenous peoples as a result of their traditional use of or tenure on forestland.</p>	
<p>Rationale for proposed change:</p> <p>Indigenous peoples should include people of racial origins other than Native Americans who have worked the land for 10 or more generations</p>	<p>Proposed New Language:</p> <p>Replace "indigenous peoples" with "local populations."</p>
<p>verifiable monitoring system A system capable of being audited by a third party that includes (a) a means to characterize the Program Participant's wood and fiber supply area, which may include sources certified to a standard that requires reforestation and compliance with BMPs; (b) a process to identify and use sources of available data (e.g., state monitoring programs, certification status of suppliers) in the use of BMPs and rates of reforestation; and (c) a method to assess supplier performance, if needed, to supplement available data.</p>	
<p>Rationale for proposed change:</p> <p>This definition is vague and confusing. Please modify it to say what you expect participants to do. Drop reforestation from the determination of need for promotion because economics are the driving factor influencing landowner's reforestation decisions, not more effective encouragement by Program Participants.</p>	<p>Proposed New Language:</p> <p>A system capable of being audited by a third party that includes: Characterization of the wood and fiber supply area; Identification of available sources of reforestation and BMP data in the wood and fiber supply area; Evaluation and use of reforestation and BMP data; and Determination of the need for promotion of BMPs across the wood and fiber supply area.</p>
<p>ISO 9000-Quality Management Systems-fundamentals and vocabulary</p>	<p>Use ISO 9000 and 17000 terminology whenever possible</p>
<p>Clarify the definition so it reflects its purpose under Objective 8.</p>	<p>"verifiable monitoring system." A system capable of being audited by a third party that includes: (a) monitor reforestation across the wood and fiber supply area; (b) monitor the use of BMPs by wood producers supplying the Program Participant; and c) evaluate the need for promotion of reforestation and BMPs across the wood and fiber supply area</p>
<p>visual quality The seen aspects of both the land and the activities that occur upon it.</p>	
<p>Rationale for proposed change:</p> <p>[No Comment]</p>	<p>Proposed New Language:</p> <p>The character, condition, and quality of a scenic landscape or other visual resource and how it is perceived, preferred, or otherwise valued by the public.</p>

<p>visual quality management Minimization of the adverse visual effects of forest management activities.</p>	
Rationale for proposed change:	Proposed New Language:
<p>wildlife Marine and freshwater aquatic and terrestrial fauna.</p>	
Rationale for proposed change:	Proposed New Language:
Vegetation has not been identified explicitly but implicitly as part of habitat and landscapes. In some instances and jurisdictions the term wildlife is used to include flora.	[No Comment]
<p>wood and fiber supply area The geographic area from which a Program Participant procures, over time, most of its wood and fiber from wood producers.</p>	
Rationale for proposed change:	Proposed New Language:
<p>wood producer A person or organization, including loggers and wood dealers, involved in harvesting or regularly supplying wood fiber directly from the forest for commercial purposes.</p>	
Rationale for proposed change:	Proposed New Language:
This definition does not meet reality. Also it is too inclusive. Is this definition meant to exclude those organizations that produce wood from sources other than directly from the forest (i.e. conversion sites such as development and urban tree services)? Consider adding a definition of forest. It would be good to clarify that by forest you mean only timberland that is staying in forest. Wood produced from conversion (i.e. development or rights of ways) sites is not sustainably managed and therefore not "forest". In tern, then contractors who produce wood exclusively from non-forest sites (i.e. land clearing and development sites) are not wood producers (not loggers).	A person or organization directing the operations of logging equipment (and equipment operators) that conduct their operations in the forest. (aka Logger, Logging Professional)
[No Comment]	<p>Since there seems to be no other place for new definitions, I include them here:</p> <p>continual improvement [italics] A set of activities that an organization routinely carries out in order to enhance its ability to meet requirements. Continual improvement can be achieved by carrying out internal audits, performing management reviews, analyzing data, and implementing corrective and preventive actions. [from http://www.praxiom.com/iso-definition.htm#Continual%20improvement]</p>

	final harvest [italics] A stand replacement cut where all or most of the trees are removed. [adapted from http://www.dnr.state.mi.us/publications/pdfs/ForestsL andWater/Cmpt_Reviews/GlossaryOfTerms.pdf]
Need to add two more definitions - Certified Master Logger and Certified Master Logger Program	<p>Certified Master Logger - a qualified professional logging business that is participating in a recognized, credible Certified Master Logger Program</p> <p>Certified Master Logger Program - a program which 3rd party audits and verifies the on the ground sustainable harvesting practices of a qualified professional logging business.</p>
For clarification, coupled with the new definition for "wood supplier."	"wood producer." A person or organization directing the operations of logging equipment and equipment operators that conduct their operations in the forest. (aka Logger, Logging Professional)
Wood producer: The current list is exclusive and parochial, and is implicitly limiting.	Wood producer: Change to: "...including, but not limited to, loggers, landowners, contractors, wood dealers, and other wood producers, involved in..."

Please use this space to propose any additional definitions.

Add a definitions for:

- long-term as it pertains to leases, harvest levels and resource analysis (see comments about Objective 1).
- invasive species, both animal and plant.
- visual quality objectives
- aquatic flora.
- biomass.

Harvest plan -The harvest plan is a written document that addresses landowner objectives and reflects the requirements in the logger certification program standard. The harvest plan should include a sale map identifying the cutting area, cutting specifications and pertinent operational requirements and restrictions. In addition, the harvest plan should specifically address: regeneration, water quality, riparian, wildlife, endangered and threatened species and OSHA requirements.

Management plan - a detailed plan developed by a professional forester for a landowner which provides long range planning for the property, addresses landowner objectives, soil types, water & visual quality, wildlife, forest health, riparian areas and endangered and threatened species.

"wood supplier." A person or organization that enters into Direct contract/agreement with a Program Participant for the sale and delivery of certain quantities of wood. A wood supplier may also be the wood producer but the wood producer is not a wood supplier without the direct contract/agreement with The Program Participant.

Add, "Indirect supplier A wood fiber supplier who purchases wood from multiple points of origin at a specific location and either rehandles or further processes the fiber before delivering it to a Program Participant facility. Examples: non-Program Participant owned sawmills, chip mills, or woodyards.

High Conservation Value Forests

a) Forest areas containing globally, regionally or nationally significant:

i. concentrations of biodiversity values (e.g., endemism, endangered species, refugia); and/or
ii. large landscape level forests, contained within, or containing the management unit, where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance

b) Forest areas that are in or contain rare, threatened or endangered ecosystems

c) Forest areas that provide basic services of nature in critical situations (e.g., watershed protection, erosion control)

d) Forest areas fundamental to meeting basic needs of local communities (e.g., subsistence, health) and/or critical to local communities' traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities).

Ecologically important wetland: Wetlands that meet one or more of the following criteria: biogeographic representation; important ecological or hydrological functions; provision of animal habitat during times of vulnerability or adverse conditions; support for imperiled or vulnerable species or communities; and historical or cultural significance.

AUDIT PROCEDURES

Audit Procedures and Qualifications Note: Please note that there have been programmatic changes with the creation of SFI Inc. in January 2007 that require editorial changes to the SFI Standard, Audit Procedures and other SFI program documents. For example, the SFI Inc, Board of Directors approved the requirement for certification body accreditation through international accreditation bodies, such as the American National Standards Institute, ANAB-ANSI-ASQ National Accreditation Board and the Standards Council of Canada during the 2004 SFI Standard review process subject to the development and implementation of those programs. These programs have now been developed and are fully implemented. As such, some sections of the APQ are not current and others no longer relevant. However, to ensure transparency in the review process, we will accept any comments you wish to make on the Standard or APQ at this time. SFI Inc staff is currently working to make the changes necessary for these documents. We anticipate having a corrected version (with a copy in change tracker) of the SFI Standard and APQ posted on the SFI Inc. website by August 1, 2008. In addition, any references to the "Sustainable Forestry Board (SFB)" or "American Forest & Paper Association (AF&PA)" in the SFI Standard, APQ and other documents should be ignored. SFI Inc. is now a fully independent, registered non-profit charitable organization with a 501c3 status. Its three-chamber Board of Directors governs all aspects of the SFI program, with equal representation from the environmental, economic and social sectors. The SFB was merged into the new SFI Inc. organization in January 2007 and AF&PA no longer has any control over the SFI program. As the U.S. industry's trade association, AF&PA still makes participation in SFI or other North American forest certification programs endorsed by the Program for the Endorsement of Forest Certification schemes (PEFC) a condition of membership to improve forest practices. The situation is similar in Canada where the Forest Products Association of Canada has made certification to SFI, the Canadian Standards Association or the Forest Stewardship Council

(FSC) a condition of membership.

Introduction Audits for the Sustainable Forestry Initiative Standard® (SFI) should be conducted in accordance with the principles of auditing contained in the International Organization for Standardization (ISO) 19011:2002 guidelines for quality and/or environmental management systems auditing. ISO is a worldwide federation of national standards bodies. The preparation of International Standards is conducted by ISO technical committees. The ISO 19011 guidelines were prepared jointly by Technical Committee ISO/TC 176 for Quality Management and Quality Assurance, and Technical Committee ISO/TC 207 for Environmental Management. The ISO 19011 guidelines provide direction for conducting management systems audit programs, conducting internal and external audits of management systems, and evaluating and determining competence of auditors for a broad range of potential users. The SFI Audit Procedures and Qualifications (APQ) follow a format similar to that of the ISO 19011 guidelines in giving specific requirements to Program Participants and auditors for conducting audits to the SFI Standard. The Sustainable Forestry Board requires that all certification, recertification, or surveillance audits to the SFI Standard conducted by third parties follow the guidelines provided in ISO 19011 document and satisfy the SFI APQ requirements.

Rationale for proposed change:	Proposed New Language:
ISO 19011 guidelines are applicable for both quality management system and product certification programs.	The ISO 19011 guidelines provide direction for conducting audits for quality management and product certification schemes. The guideline also serves as an evaluation tool for the certification and accreditation bodies to evaluate and auditor/inspector competency.

1. Scope This SFI Audit Procedures and Qualifications document supports the International Standard ISO 19011:2002 Guidelines for quality and/or environmental management systems auditing by providing specific requirements to Program Participants and auditors. It is applicable to all forest management and wood procurement organizations when conducting third-party certification, recertification, or surveillance audits to the SFI Standard. Program Participants may decide to seek first-party verification (to self-verify), seek second-party verification, or seek independent third-party certification of conformance with the SFI Standard requirements. Although this document addresses third-party audits, it may be used as guidance if a Program Participant decides to seek first- or second-party verification.

Rationale for proposed change:	Proposed New Language:
Wood procurement should be included in the chain of custody certification system	[No Comment]
In new version of this section, need to identify all ISO and other guidance documents that dictate audit and auditor requirements. This included ISO 19011, ISO 17021, and apparently Guide 66-Annex 2 (even though this is supposed to be covered by the 17021).	[No Comment]
Only independent third-party certification minimizes the probability of a conflict of interest between Program Participants and auditors.	This SFI Audit Procedures and Qualifications document supports the International Standard ISO 19011:2002 Guidelines for quality and/or environmental management systems auditing by providing specific requirements to Program Participants and auditors. It is applicable to all forest

	<p>management and wood procurement organizations when conducting third-party certification, recertification, or surveillance audits to the SFI Standard.</p> <p>Program Participants must seek independent third-party certification of conformance with the SFI Standard requirements.</p>
--	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Use this space to add additional sections to Section 1

To satisfy the requirements for independence and objectivity, all members of the SFB shall ensure that the peer review process is free from conflict of interest and that all information gathered as part of this process is maintained in strict confidence. All members of the SFB shall sign a confidentiality and nonconflict-of-interest statement (above).

2. Normative Reference Audit firms must follow International Standard ISO 19011:2002, Guidelines for Quality and/or Environmental Management Systems Auditing, in auditing to the SFI Standard.

Rationale for proposed change:	Proposed New Language:
Auditors rather than audit firms must follow the requirements of ISO 19011	[No Comment]
Need to include relevant ISO social criteria	[No Comment]

Use this space to add additional sections to Section 2

3. Terms and Definitions Definitions of terms can be found in the 2005–2009 edition of the Sustainable Forestry Initiative Standard.

Rationale for proposed change:	Proposed New Language:
Need to include recognition of Master Logger Programs.	Master Loggers - Approved 3rd party certified Point of Harvest Certification.
for consistency and international understanding use ISO 9000: Quality Management systems- fundamentals and vocabulary ISO17000: conformity assessment-vocabulary and general principals	Whenever applicable and for consistency and international understanding, SFI shall utilize the ISO terminology in ISO 9000: Quality Management systems- fundamentals and vocabulary and ISO17000: conformity assessment-vocabulary and general principals

Use this space to add additional sections to Section 3

4. Procedures for Implementing the Principles for SFI Auditing An SFI audit firm shall have written procedures to determine how it will meet the principles of ethical conduct, fairness, professionalism, independence, and use of an evidence-based approach in conducting SFI audits. These procedures shall explicitly address auditor conflicts of interest and confidentiality in the audit process and be consistent with other authorities under which the audit firm operates. To satisfy the requirements for independence and objectivity, an auditor shall ensure that the services it provides are free from conflict of interest and that all information gathered as part of these services is maintained in strict confidence. The auditor shall require all members of an audit team (including technical experts) to sign a confidentiality and nonconflict-of-interest statement. At a minimum, this statement shall include the following: No person conducting work for and on behalf of an auditor shall accept, from any source, inducements for the purposes of assisting, favoring, hindering, or delaying any transactions between the Program Participant and the auditor. Any actual or potential conflict of interest identified by prospective audit team members shall be disclosed to the auditor. The auditor shall ensure that appropriate action is taken; e.g., a change of personnel for that particular task. Typical examples of an actual or potential conflict of interest for a member of an SFI audit team include the following: financial interest or involvement within the organization being audited; previous employment and or consultancy by the organization being audited within the past three years or since the most recent certification or recertification audit; and direct personal connections or relationships with persons within the organization being audited. All information and documents, including working drafts and any reports, shall be considered confidential. Auditors shall not release any information or documents without the prior written permission of the Program Participant. Auditors shall conduct themselves in a professional and ethical manner. Auditor and audit team members and their employers shall not participate in an appraisal or advise a potential purchaser or broker a purchase of property audited within the prior three years without the written permission of the audited party. Auditors, audit team members, and employers shall notify the audited party of participation in such activities after the three-year period immediately upon initiation of such activities for a period of at least 10 years following the audit. Prior to engaging in an audit and the Program Participant's acceptance of the audit team, the auditor and audit team members shall disclose to the party requesting an audit any prior land appraisal or assessment work or land brokerage activity they or their employers conducted related to the property to be audited. The audit firm also shall establish written procedures for implementing the requirements of its audit program as identified in Sections 5, 6, and 7 of the ISO 19011 and the SFI APQ.

Rationale for proposed change:	Proposed New Language:
<p>It is the responsibility of the certification body responsibility to ensure that the audit team has no conflicts of interest prior to making the audit assignment.</p> <p>Change the words "audit firm" to "certification body"</p>	<p>As appropriate, change the word auditor/audit team/audit firm to certification body.</p> <p>The "certification body" shall require all members of an audit team (including technical experts) to sign a confidentiality and nonconflict-of-interest statement.</p>

Use this space to add additional sections to Section 4

5. SFI Audit Program Monitoring The Sustainable Forestry Board (SFB) provides quality control of the auditors and audit procedures through annual peer review. SFB witnesses the execution of at least one certification or recertification audit for each approved audit firm each year. The objective of this witnessed audit is to ensure that the audit firm is conducting SFI certification audits in conformance with the ISO 19011 guidelines and the SFI APQ requirements. SFB has established written procedures for conducting witnessed audits in the field and communicates these to the auditor prior to the witnessed audit. Audit firms must provide SFB with the dates of all scheduled audits to facilitate peer review. If an audit firm does not conduct an audit in a given year, SFB shall prioritize that firm for witnessing of its next audit.

Rationale for proposed change:	Proposed New Language:
Certification Bodies for (procurement) chain of custody shall conduct SFI audits in conformance with the requirements of ISO/IEC Guide 65.	[No Comment]

Use this space to add additional sections to Section 5

6. SFI Audit Activities 6.1. Initiating the SFI Audit 6.1.1. Prior Notification to SFB Any organization seeking independent third-party certification or recertification to the SFI Standard shall notify the Sustainable Forestry Board a minimum of two weeks prior to undertaking the audit.

Rationale for proposed change:	Proposed New Language:
Direct expectations of certified participants should be summarized together and succinctly, and kept separate from the sections that describe auditor requirements.	[No Comment]

6.1.2. Objectives and Scope for SFI Audits Audit objectives and scope are determined jointly by the audit firm and the Program Participant. The audit firm must ensure that the objectives and scope of the audit meet the SFI Standard requirements; set an appropriate geographic scale; allow for accurate field determination of conformance for the entire operating unit; and apply all relevant portions of the standard (principles, policies, objectives, performance measures, and indicators). Two specific audit objectives shall be accomplished during SFI certification audits. An SFI audit shall verify that the Program Participant's SFI Program is in conformance with SFI objectives, performance measures, and indicators, and any additional indicators that the Program Participant chooses and verify whether the Program Participant has effectively implemented its SFI Standard program requirements on the ground.

Rationale for proposed change:	Proposed New Language:
Minimize redundant language.	Audit objectives and scope are determined jointly by the audit firm and the Program Participant. The audit firm shall ensure that the objectives and scope of the audit <ul style="list-style-type: none"> • allow for accurate field determination of conformance for the entire operating unit; • verify that the Program Participant's SFI Program is in conformance with SFI principles, policies,

	<p>objectives, performance measures, and indicators, and any additional indicators that the Program Participant chooses; and</p> <ul style="list-style-type: none"> • verify whether the Program Participant has effectively implemented its SFI Standard program requirements on the ground.
--	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

6.4. Completing the SFI Audit The effective date on the certificate of conformance shall be the date of the closing meeting (if there are no nonconformances) or the date when all corrective action plans for minor nonconformances have been approved by the lead auditor and corrective actions for all major nonconformances have been implemented.

Rationale for proposed change:	Proposed New Language:
The effective "initial" date of certification on the certificate of conformance is typically the date that the CB makes the initial decision to grant certification.	The effective date of initial certification typically remains the same for recertification. Only the year changes.

6.5. Surveillance Audits To ensure continued conformance to the SFI Standard, surveillance audits shall normally be annual, consistent with International Accreditation Forum Guidance on the Application of ISO/IEC Guide 66, and the interval shall not exceed 18 months. If a Program Participant wishes to make a public statement on their SFI certification, surveillance audit reports shall be submitted to SFB. The content of these reports shall follow the requirements of Section 8.1, below.

Rationale for proposed change:	Proposed New Language:
It would be appropriate to reduce the required frequency of surveillance audits once a consistent level of performance has been achieved.	Suggest increasing the duration between audits to 24 months once one cycle of registration and surveillance audits has been completed without major non-conformances.

6.6. Recertification To maintain a current SFI certificate, Program Participants shall periodically recertify their SFI Programs. Recertification to the SFI Standard can be achieved in two ways as agreed to by the Program Participant and the audit firm.

Rationale for proposed change:	Proposed New Language:
	The month and day of the initial date of certification should remain. Only the year will change with recertification.

6.6.1. Standard Recertification Under the standard recertification approach, a full recertification audit against all of the SFI Standard objectives, performance measures, and indicators is required every five years.

Rationale for proposed change:	Proposed New Language:

6.6.2. Continuous Certification Alternatively, surveillance audits may be used to complete the recertification if, over the five-year period, conformance with each SFI Standard objective, performance measure, and indicator is fully assessed as appropriate to the scope and scale of the certificate at least once during the five-year period.

Rationale for proposed change:	Proposed New Language:

Use this space to add additional sections to Section 6

6.3. The SFI Audit Report (not sure why this doesn't show up on the survey)

The SFI audit report shall cover

- a.the audit objectives, scope, time period, and audit plan;
- b.identification of the Program Participant and audit team personnel;
- c.a description of the audit process used;
- d.documentation of the rationale for the substitution of modification of any indicators;
- e.audit findings and conclusions, including findings of conformance, non-conformances, and corrective action plans.
- f.

7. Competence of SFI Audit Firms, Audit Teams, and Auditors 7.1. Qualifications of Audit Firms Firms that conduct SFI audits must be environmental management system (EMS) registrars and accredited by the American National Standards Institute or the Standards Council of Canada.

Rationale for proposed change:	Proposed New Language:
This single requirement increases the cost of 3rd party audits considerably (from ~\$500/day to ~\$1,500/day) . Firms can be qualified and provide qualified auditors without this specific accreditation. Define the equivalent standards/practices needed for a firm so that less expensive auditing firms can conduct SFI audits. The cost of achieving ANSI accreditation is over-burdensome to many firms that otherwise are highly qualified.	Drop the ANSI requirement and/or provide qualitative equivalents for auditing firms.
Certification bodies that conduct EMS audits must be accredited by ANAB. American National Standards Institute does not accredit bodies to ISO/IEC Guide 66	and accredited by ANAB
For clarification.	Change to : Only certification bodies that have successfully completed an accreditation program through an internationally recognized accreditation body can perform SFI SFI certification audits or meet the equivalent qualifications as substantiated to and

7.2. Qualifications of Audit Teams Audit teams shall have the knowledge and skills to conduct an audit in accordance with the principles of auditing. The audit firm shall select audit team members appropriate to the scope, scale, and geography of the audit. Additionally, at least one member of the audit team shall have knowledge of forestry operations in the region undergoing the audit, at least one member shall have knowledge of applicable laws and regulations, and at least one member shall be a professional forester as defined by the Society of American Foresters (SAF), the Canadian Institute of Forestry, or licensed or registered by the state(s) or province (s) in which the certification is conducted. For forest management audits, the audit team shall have expertise that includes plant and wildlife ecology, silviculture, forest modeling, forest operations, and hydrology. One specialist per discipline is not required to meet any of the above requirements.

Rationale for proposed change:	Proposed New Language:
Audit firm is not an ISO term	certification body or conformity assessment body for certification (see ISO 9000 and ISO/IEC 17000)
Non-forestry specialists are not qualified to be members of a sustainable forestry audit team, and thus should not be allowed.	Audit teams shall have the knowledge and skills to conduct an audit in accordance with the principles of auditing. The audit firm shall select audit team members appropriate to the scope, scale, and geography of the audit. Additionally, at least one member of the audit team shall have knowledge of forestry operations in the region undergoing the audit, at least one member shall have knowledge of applicable laws and regulations, and at least one member shall be a professional forester as defined by the Society of American Foresters (SAF), the Canadian Institute of Forestry, or licensed or registered by the state(s) or province (s) in which the certification is conducted. For forest management audits, the audit team shall have expertise that includes plant and wildlife ecology, silviculture, forest modeling, forest operations, and hydrology. Each audit team member must meet at least one of the above requirements.

7.3. Qualifications of Auditors Audit team members shall have the education, formal training, and experience that promotes competency in and comprehension of forestry operations as they relate to natural resource management, including wildlife, fisheries, recreation, etc.; environmental regulation related to forestry; international and domestic sustainable forestry management systems and performance standards; and certification requirements related to the SFI. All auditors shall have education, training and experience appropriate to their responsibilities on the audit team. At a minimum, audit team members shall have completed a secondary education or equivalent. Audit team members who do not have a professional degree in forestry or a closely related field shall have a minimum of five years' work experience. No more than two years of postsecondary education in pursuit of a professional degree can be credited against work experience. Audit team members who have obtained a professional degree in forestry or a closely related field shall have a minimum of two years' relevant work experience. The provisions of Table 1 in ISO 19011 shall not apply to SFI auditors.

Rationale for proposed change:	Proposed New Language:
---------------------------------------	-------------------------------

<p>A 37 hr accredited lead auditor training course is the typical approved certification requirement for status of Lead Auditor. A number of "witnessed" audits for the product certification scope should also be determined to meet the lead auditor requirement.</p>	<p>The lead auditor shall have a certificate for completion of a 37 hr accredited lead auditor course. To be certified for the forestry-chain of custody product scope five witnessed audit days should be completed.</p> <p>If the lead auditor does not meet the requirements of the forestry-chain of custody product scope, the lead auditor must be accompanied by a technical expert who is qualified for the scope.</p>
<p>Reword for clarity.</p>	<p>Audit team members shall have the education, formal training, experience, competency in, and comprehension of forestry operations as they relate to natural resource management, including wildlife, fisheries, recreation, etc.; environmental regulation related to forestry; international and domestic sustainable forestry management systems and performance standards; and certification requirements related to the SFI.</p> <p>All auditors shall have education, training and experience appropriate to their responsibilities on the audit team. At a minimum, audit team members shall have completed a secondary education or equivalent. Audit team members who do not have a professional degree in forestry or a closely related field shall have a minimum of five years' work experience in forestry or a closely related field. No more than two years of postsecondary education in pursuit of a professional degree can be credited against work experience. Audit team members who have obtained a professional degree in forestry or a closely related field shall have a minimum of two years' relevant work experience.</p> <p>The provisions of Table 1 in ISO 19011 shall not apply to SFI auditors.</p>
<p>Should include ecological expertise on certification teams for audits to be credible on ecological issues.</p>	<p>a. forestry operations as they relate to natural resource managemnet , including ecology, wildlife, fisheries, recreation, etc.</p>
<p>7.4. Qualifications of Lead Auditors Lead auditors who conduct third-party certification shall have the qualifications in Section 7.3, above, and shall be certified as an environmental management systems lead auditor, or equivalent, by a national accreditation body, such as the Registrar Accreditation Board or the Canadian Environmental Auditing Association. The lead auditor's organization or firm shall be accredited to conduct ISO 14001 certifications by the American National Standards Institute or be listed by the Registrar Accreditation Board, or equivalent.</p>	
<p>Rationale for proposed change:</p>	<p>Proposed New Language:</p>
<p>American National Standards Institute does not accredit CBs to conduct ISO 14001 audits.</p>	<p>ANSI accredits CBs to conduct ISO 14001 audits</p>

<p>ANSI accredits product certification programs (ISO/IEC Guide 65) and not QMS-EMS certification programs.</p> <p>ISO/IEC Guide 65, Section 4.2, 4.5, 4.6, 4.7, 4.8, 4.9, etc. require the certification body to have a quality management system.</p>	
---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--

7.5. Maintenance and Improvement of Competence All audit team members shall pursue ongoing personal and professional development in forest management science and technology; sustainable forest management systems and certification programs and standards; understanding and interpretation of federal and state forestry and environmental laws and codes of practice; and certification procedures, processes, and techniques, especially as these pertain to the SFI Standard. An auditor who maintains Certified Forester, Registrar Accreditation Board, or Canadian Environmental Auditing Association certification, or equivalent, shall be considered to have fulfilled continuing education requirements. Auditors shall maintain records documenting their hours of education, experience, and training and provide this information to SFB on request.

Rationale for proposed change:	Proposed New Language:

Use this space to add additional sections to Section 7

8. Public Communication and Claims 8.1. Preparing and Submitting a Public Report A Program Participant that wishes to make any public claims or statements about its SFI certification, recertification, or surveillance audit shall provide a report to the SFB not less than two weeks before making the report public. The public report will be posted on the SFB website and available for public review. The auditor shall work with the Program Participant to prepare the public report, which shall include, at a minimum, a description of the audit process, objectives, and scope; a description of substitute indicators, if any, used in the audit and a rationale for each; the name of Program Participant that was audited, including its SFI representative; a general description of the Program Participant’s forestland and manufacturing operations included in the audit; the name of the audit firm and lead auditor (names of the audit team members, including technical experts may be included at the discretion of the audit team and ‘s); the dates the certification was conducted and completed; a summary of the findings, including general descriptions of any nonconformances and corrective action plans to address them, opportunities for improvement, and exceptional practices; and the certification recommendation.

Rationale for proposed change:	Proposed New Language:
<p>Publication of audit results should be mandatory as it is with the Canadian Standards Association and the Forest Stewardship Council programs. Leaving this optional may lead to the conclusion that a Program Participant has something to hide if an audit report remains undisclosed.</p>	<p>A Program Participant [<i>italics</i>] must make its Sustainable Forestry Initiative certification, recertification, or surveillance audit publicly available. It shall do this by providing a report to the Sustainable Forestry Initiative within 60 days of completion of the audit and not less than two weeks before making the report public. The public report will be posted on the Sustainable Forestry Initiative</p>

	website and be available for public review.
There should be a timeline in place for completing and submitting the public summary report to SFI Inc.	The report must be submitted to SFI Inc. within 30 days of completion of the audit.
The public must be able to access all reports for quality control and transparency.	(change first paragraph only) Program Participants shall make any public claims or statements about its SFI certification, recertification, or surveillance audit and provide a report to the SFB not less than two weeks before making the report public. The public report will be posted on the SFB website and available for public review.
Would significantly strengthen the program if audit reports are augmented to include brief statements that indicate how an operation conforms with the standard.	g.a summary of the findings, including evidence of conformance, any nonconformances and corrective action plans to address them, opportunities for improvement, and exceptional practices; and

8.2. Public Claims Any public communication by Program Participants shall be accurate and consistent with applicable law and requirements for SFI logo use. Program Participants are encouraged to consult the U.S. Federal Trade Commission's guidelines on environmental claims in product advertising and communication and the guidelines on environmental labeling and advertising issued by the Fair Business Practices Branch of Industry Canada's Competition Bureau, as appropriate, and to seek additional information and direction from national accreditation bodies, national standards bodies and national, state and provincial consumer protection and competition laws.

Rationale for proposed change:	Proposed New Language:
<ul style="list-style-type: none"> • There is too much discretion provided to participants in choosing which laws are applicable or not. • Compliance with all laws requires consultation with the appropriate legal guidelines. 	<p>Any public communication by Program Participants shall be accurate and consistent with all laws and requirements for SFI logo use.</p> <p>Program Participants shall consult the U.S. Federal Trade Commission's guidelines on environmental claims in product advertising and communication and the guidelines on environmental labeling and advertising issued by the Fair Business Practices Branch of Industry Canada's Competition Bureau, and seek additional information and direction from national accreditation bodies, national standards bodies and national, state and provincial consumer protection and competition laws.</p>

Use this space to add additional sections to Section 8

9. Interpretations, Feedback, and Disputes and Appeals 9.1. Interpretations From time to time, a formal process may be needed to interpret the SFI Standard and its supporting documents. As part of SFB's commitment to continual improvement of both the SFI certification

process and the SFI Standard, such concerns shall be submitted promptly to the SFB Interpretations Committee at the SFB website, contact@aboutsfb.org. The SFB Interpretations Committee shall respond within 45 days of receipt. It is neither the intent nor the responsibility of the SFB Interpretations Committee to resolve disputes arising through certification; nevertheless, the committee will provide opinions and direction to assist parties in answering interpretive questions. Through this process, the SFI Program shall maintain a record of opinions and concerns available to both Program Participants and auditors to assist with certification planning. SFB shall periodically review this record and, where appropriate, recommend changes for inclusion in the SFI Standard or SFI APQ.

Rationale for proposed change:	Proposed New Language:
If intent is to not resolve disputes than how should disputes be resolved.	SFB will do its best in resolving disputes with interpretations as needed....

9.2. Disputes or Appeals between an Auditor and a Program Participant Auditors shall have an internal dispute resolution process. Resolution of all disputes between an auditor and a Program Participant shall be addressed via these mechanisms.

Rationale for proposed change:	Proposed New Language:
"Auditors" do not have internal dispute resolution processes.	The word "auditors" should be replaced with "certification bodies" as auditors do not have dispute or appeal resolution processes.

9.3. Disputes or Appeals between an External Party and a Program Participant

9.3.1. Disputes or Appeals Regarding a Single Instance or Claim of Nonconformance Any party with information or claims about a Program Participant's individual practices that may be in nonconformance may seek to have those claims investigated. The complainant shall present specific claims of nonconformance in writing and in sufficient detail to the Program Participant. Within 45 days of receipt of the complaint, the Program Participant shall respond to the complainant and forward a copy of the complaint and its response to the Program Participant's auditor for future review via surveillance or certification audits. The auditor shall investigate the validity of the complaint and the Program Participant's response and resolution of the claim at the time of the next scheduled surveillance audit. A complainant who believes the issue has not been satisfactorily resolved may provide its original documentation and the response from the Program Participant to the appropriate SFI Implementation Committee Inconsistent Practices Program, which shall investigate and respond to the allegations within 45 days of receipt of documentation. If no appropriate SFI Implementation Committee Inconsistent Practices Program exists, the complainant may address the issue to the SFI National Inconsistent Practices office via the External Review Panel Secretariat. The SFI Implementation Committee or National Inconsistent Practices Program shall provide copies of its findings and any recommended actions to both the Program Participant and the complainant.

Rationale for proposed change:	Proposed New Language:
During the witness assessment the accreditation body auditor observes the applicant or accredited certification body auditor/inspector as he reviews the certified supplier's complaint records. (ISO/IEC Guide 65, Section 15: Complaints to Suppliers.	The Program Participant shall respond... and forward a copy of the complaint and its response to its certification body or use the language in ISO/IEC Guide 65, Section 15.

9.3.2. Disputes or Appeals Questioning the Validity of a Certification Any party with information or claims that question the validity of an entire certification may seek to have those claims investigated. The complainant shall document the specific claims of nonconformance in writing and in sufficient detail to the Program Participant. Within 45 days of receipt of the complaint, the Program Participant shall respond to the complainant in writing and forward a copy of the complaint and its response to the Program Participant’s auditor for future review via surveillance or certification audits. A complainant who believes the issue has not been satisfactorily resolved may provide its original documentation and the response from the Program Participant to the SFB President for review and consideration by the SFB Certification Appeals Subcommittee, which shall immediately appoint an ad hoc member with appropriate forestry expertise. Upon reviewing the information, the SFB Certification Appeals Subcommittee may declare the claim invalid, thus closing the review; seek more information from the complainant or the Program Participant; or if, in the view of the SFB Certification Appeals Subcommittee, there is sufficient evidence, if confirmed, to threaten the validity of the certification, refer the case to SFB for possible resolution by an ad hoc certification review task force comprising, at a minimum, one representative from the certification auditing profession; one representative from the professional forestry community with expertise and knowledge of forest conditions and practice in the region; and one representative from the environmental nongovernmental organization community. The above representatives may, where appropriate, be drawn from the External Review Panel and SFB, with such representation limited to a single individual from each body. The ad hoc certification review task force shall review all relevant information and if necessary conduct a field visit. Upon review, the task force may find that the case is without merit and no further action is required; find that corrective actions are necessary; or if the Program Participant fails to take appropriate corrective measures or if no action would be sufficient to remedy the situation, suspend certification.

Rationale for proposed change:	Proposed New Language:
ISO/IEC Guide 65, Sections 4.8 f. and 7.0: Appeals, complaints and disputes address the requirements for the accredited certification bodies to have procedures and records, etc of appeals, complaints, disputes and to inform the supplier of these procedures	If the certification body and the accreditation bodies cannot resolve appeals, complaints and disputes, SFI can serve as the higher level of authority to resolve the issues or SFI can offer various options.

Use this space to add additional sections to Section 9

Supporting Documents As a part of the 2005-2009 SFI Standard Review process, you also have the opportunity to comment on the following supporting documents: Interpretations Questions and Answers for the 2005-2009 SFI Standard 2005-2009 SFI Standard Guidance Document Requirements for Fiber Sourcing, Chain of Custody and On Product Labels Interpretations Questions and Answers for the 2005-2009 SFI Standard [http://www.sfiprogram.org/miscPDFs/2005-09%20SFIS% 20Interpretations.pdf](http://www.sfiprogram.org/miscPDFs/2005-09%20SFIS%20Interpretations.pdf) Please comment on the current Interpretations to the SFI Standard. Are there any that should be incorporated into the new Standard?

no comment

There is currently no guidance document that outlines how Program Participants can address or implement the SFI Standard. Although, most of the performance objectives and indicators are self-explanatory, many contain language which vague and subject to interpretation. The FSC standard outlines measurables for a lof their indicators which would be useful for the SFI Standard.

See general comments about how these interpretations are updated.	
Yes, incorporate them all including changes below.	
10.1-- What constitutes a "trained logging crew"?	
Rationale for proposed change:	Proposed New Language: