SUSTAINABLE FORESTRY INITIATIVE
SFI-00001

2010-2014 SFI Standard Review Survey

Comments Received during June-August 2013 Public Review

The SFI Standard is periodically reviewed through an open and public process that addresses research, responds to emerging issues and ensures continuous improvement of SFI program participants' performance.

The Requirements for the SFI 2010-2014 Program address all of SFI's standards, rules for label use, procedures, and guidance for the program. All of SFI's standards were open for comment. The working draft of the SFI 2015-2019 Standard released January 6, 2014 was the result of input from comments submitted during the first 60-day public comment period which ran from June 5 – August 6, 2013.

Please direct any questions to Gregor Macintosh (gregor.macintosh@sfiprogram.org), SFI Senior Director, Standards.

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SFI 2010-2014 STANDARD COMMENT	RATIONALE FOR PROPOSED CHANGE	PROPOSED NEW LANGUAGE	COMMENT REVIEW	RATIONALE	REVISED OR PROPOSED NEW LANGUAGE
SECTION 1: INTRODUCTION					
A threshold issue for the SFI is the requirement that primary manufacturers wanting just chain of custody would nonetheless have to implement the SFI Fiber Sourcing requirements. But, companies are deciding to PEFC CoC and thus avoid the SFI requirements to do Objectives 8-20. And threshold issue is allowing private owners of timberland and sawmills to implement ATFS on their fee lands and limit the sawmill to the procurement Objectives 8-20. The owner is the same, but the timberlands and sawmill are under separate legal entities. My view is that the spirit and intent of the SFI should be to require owners of affiliated companies, subsidiaries and other legal entities owned and controlled by the same person/family to be subject to all SFI requirements (including 1-7) and not just 8-20. Another structural issue (loophole) that should be filled is the issue of short vs. long term leases. Under current SFI Interpretation, a short term lease is defined by the scenario where the remaining years on the lease are less than the rotation age of the forest. For example, if the remaining term on a lease is 25 years, and the normal rotation age is 27 years, then the lands are treated as wood procurement and not controlled lands subject to Obj. 1-7. The spirit and intent of the SFI should be to require companies that have management control and responsibility of lands under any lease to be subject to SFI Objectives 1-7. The fact is that the company has land management control, and whether it is short vs. long should not be a factor.	Recommend removing the requirement that go graudate to CoC, you have to do SFI Fiber Sourcing first. Don't allow companies owned by the same individual to exclude their lands from Objectives 1-7 and only implement 8-10 as a procurement organization. Also, do away with the distinction between short and long term leases. If you have a leave, you have management control over the land, period!		2	At the time of each SFI standard revision all aspects of SFI program are reviewed. Comments will be considered bythe Task Groups looking at SFI Section 2, 3 and 4.	

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Although inherently understood by many in the forestry community, the role of sustainable forestry to the greater benefit of forest health (and especially in relation to the mentions of mitigating climate change) would not only be compelling, but help to bring in a greater dynamic of more environmentally minded individuals than the more traditional production minded.	see comment	insert in 3rd paragraph under emerging themes (although not necessarily an emerging theme, a beneficial theme to reiterate...): And to a greater extent, sustainbly well managed forests reduce wildfire and other forest threats that can create uncontrolled releases of carbon and unplanned activities causing additional stress on the ecosystem. (or something like that - hard to see the comment when contained in a small box...)	2	At the time of each SFI standard revision all aspects of SFI Section 1 - Introduction are reviewed. Note that revisions to Section 2 Objectives 16 and 17 has been proposed to incorporate features addressing the topic of wildfire.	See proposed language for Indicators 16.1.1; 18.1.2
CLIMATE CHANGE NEEDS TO BE DEFINED	WHAT IS CLIMATE CHANGE		2	A definition for climate change is proposed for addition to Section 13 - SFI Definitions	See proposed definitons for climate change in Section 13 - Definitions
Governance: SFI governance should be strengthened to address concerns over transparency, balanced representation and decision-making. Committees at all levels should require balanced representation and a quorum by sector for decision-making. Reporting: SFI Public Summaries continue to provide very little information about the audit findings. Essential components of a typical audit report should include evidence of conformity/nonconformity, which provides basic transparency for credible certification systems.	SFI governance should be strengthened to address concerns over transparency, balanced representation and decision-making. Essential components of a typical audit report should include evidence of conformity/nonconformity, which provides basic transparency for credible certification systems.	Governance: Moving to a membership structure would strengthen representation and balanced decision-making. In addition, the recommended changes to the labeling program and public reporting requirements described below would help provide essential transparency for the program. Inclusion of these elements in a more robust transparency policy and the SFI bylaws would also strengthen SFI governance and reporting. Reporting: For basic transparency, public summaries should include the evidence of conformity/nonconformity. See Governance above for complementary recommendations to strengthen transparency in reporting.		Comments regarding SFI governance are out of the scope of the SFI stanadard review howeer for information on the SFI governance please go to: http://www.sfiprogram.org/about-us/sfi-governance/	

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I am not sure which section to submit this comment under so I am including it here. We believe SFI should consider formal recognition of independent, credible third party certified logger certification programs. SFI should develop a clear definition and distinction between "qualified logger" and "certified logger" ... preferably by identifying essential criteria for certified loggers (i.e., annual third party audits, measurable standard, etc.). Further, there should be a recognized difference between fiber sourced from family forestland by qualified logging professionals and an independent third-party certified logging professional (e.g., Minnesota Certified Master Logger). Without a recognized difference between the two, logger certification programs and Certified Logging Professionals are unlikely to exist in the near future due to lack of financial or marketplace incentive and recognition. The cost, time, and other demands related to administration of such programs exceeds the current financial/marketplace value. As a large public landowner, this would be a shame and a loss, possibly resulting in a lower bar for logger training and performance. If certified logger programs are unable to get the recognition and support they need to continue, private landowners who would otherwise have preferred to work with a higher-caliber of loggers will have a harder time distinguishing between the average logger vs. ones that would otherwise have been enrolled and participating in a certified logger program.	Only 10% of the world's forests are certified in North America. The majority of the land that is yet un-certified is either federal land or private family forestland. While SFI encourages certification of family forestland, it is also a fact that many family forest owners do not have the resources, interest, or awareness, nor do they perceive the need to incur additional annual costs associated with maintaining a certified forest - particularly for those who own small acreages. This situation is made worse by the lack of consumer demand or willingness to provide price premiums for certified fiber. IN the US, more than 10 miollion family forest owners account for 60 percent of the forestland and more than 50 percent of the raw material used by SFI Program Participants. Today, 10 percent of teh world's forests are certified and in North America, while large tracs of public and industrial forestland is certified, less than 1 percent of family forestland is certified.		2	Logger Forum was convened to look at issue of QLP requirements. Logger Forum drawn from SICs, Program Participants, American Loggers Council and loggers. New definition for QLP has been added to Section 13. New requirements for QLP continuing education have also been added to Objectives 17.	See proposed new requirements in Objective 17 - Training and Education. See new definition of QLP in Section 13.

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Pour tout l'ensemble du document portant sur les Exigences du programme SFI 2010-2014, bien cerner ce qui est de nature informaf par rapport au normatif. Se concentrer sur le normatif.	La documentation de nature informative pourrait être présentée dans d'autres documents pour alléger les normes.	none.	2	The SFI program is structured so that the normative requirements for certified program participants are included in SFI Sections 2, 3, and 4. Section 5 addresses rules regarding artwork for SFI labels with which certified program participants must comply. Scton 6 is Guidance on implementation of SFI normative requirements in Section 2. Section 9 and 0 are requirements for the Certification Bodies. Finally Sections 1, 7, 11, 12 and 13 are informational.	
The 2010-2014 Standard does not adequately address bioenergy, short rotation woody crops, or the use of exotic species in the forest management situations.	SFI must develop a Bioenergy Feedstock/Short Rotation Woody Crop module. The module should include short rotation woody crops for all uses, not just bioenergy, and must address the use of exotic species in these situations. The scope of the module and all related language should focus on the management activities and not the final product. The Standard should provide the same assurances to customers and consumers regardless of the final product, whether it is solid wood building products, paper products, or feedstocks for bioenergy. In addition, the requirements for forest management and fiber sourcing should be the same regardless of whether the end-user is a traditional forest or paper product company or emerging bioenergy production company.		2	SFI Inc has assembled the Bioenergy and Climate Change Task Group. One of its focus areas is the topic of short rotation crops. The task group reviewed all comments related to bioenergy and climate change and these responses can be found in the responses in Section 2.	See Section 2 responses for Objectives 16.
The 2010-2014 Standard represented a significant expansion of requirements and documentation of indicators not necessarily tied to the practices and implementation of sustainable forestry. Refinement and streamlining should be the emphasis of the current revision process. Further expansion of documentation, socially driven standards and indicators, and increased administrative burdens are not acceptable.			3	General Comment	

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The Introduction is missing the SFI commitment to landowner outreach and education.	This is a significant requirement in the standard. As the opening paragraph references this for the general public, private landowners should be referenced, too.	Pg 1, par. 1, second sentence – End sentence with "…and private landowners."	2	At the time of each SFI standard revision all aspects of SFI Section 1 - Introduction are reviewed. The comment will be considered by the Task Group.	
There is not enough about socio-economic benefits in the current standard.	Montreal Standard: .Maintenance and enhancement of long-term multiple socio-economic benefits to meet the needs of societies.	Add: Sustainable forestry maintains the multiple connections between people and forests.	2	SFI Section 1 - Introduction p.1 lists the 7 Montreal Process Criteria including 6 - Maintenance and enhancement of long-term multiple socio-economic benefits to meet the needs of societies.	

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On p.9 where the Montreal Process criteria are listed, 6 criteria are listed, which seems to omit the criterion regarding Legal, Institutional and Economic Framework for Forest Conservation and Sustainable Management			2	SFI Section 1 - Introduction p. 1 lists the 7 Montreal Process Criteria including 7 - Legal, Institutional and Economic Framework for Forest Conservation and Sustainable Management.	
do more to promote bioenergy feedstock	globally we are not moving quickly enough to transistion to green energy		2	SFI Inc has assembled the Bioenergy and Climate Change Task Group. One of its focus areas is the topic of short rotation crops. The task group reviewed all comments related to bioenergy and climate change and these responses can be found in the responses in Section 2.	See Section 2 responses for Objectives 16.

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SFI has a chance to clarify, avoid arbitrary counterproductive rules, increase credibility, and make the Standard more user-friendly in the face of a competing system that seems bent on self-destruction. The terms "Standard" & "Section" are used inconsistently, e.g., is the whole thing a standard, or is the SFI COC Standard part of the SFI Standard? There are sections within sections – this is surely confusing. Finally Section 4 has two parts, each with its own numbering system, and 7.2 & 7.3 (and elsewhere in Section 4, in Section 5, and in Section 9 Appendix 1) in this Section cite a "SFI Responsible Fiber sourcing Standard and Associated Labels (Section 4 of the SFI requirements document)" which is nowhere to be found using such language, and appears to be self-referential. (Similarly, Section 7 refers to the "SFI Responsible Fiber Sourcing Standard", and the definition of "label user" in Section 13 cites "SFI Responsible Fiber sourcing Standard and Associated Labels (Sections 3 and 4)".)			2	At the time of each SFI standard revision all aspects of SFI program are reviewed. The comments will be considered during the second review period.	

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Auditable Language: SFI standard requirements are generally plan- or program-based, which could be implemented with varying levels of rigor. It is unclear how these are audited, and how SFI can claim any consistency in these areas of the program. Here are some of the many examples of vague, unauditable language in the standard. Current language: 4.1.1. Program to promote the conservation of native biological diversity, including species, wildlife habitats and ecological community types. 4.1.5. Program for assessment, conducted either individually or collaboratively, of forest cover types, age or size classes, and habitats at the individual ownership level and, where credible data are available, across the landscape, and take into account findings in planning and management activities. 4.1.6. Support of and participation in plans or programs for the conservation of old-growth forests in the region of ownership. 8.1.2 "Program to address Forests of Exceptional Conservation Value in harvests with purchased stumpage" . 17.1.5. Program Participants are knowledgeable about credible regional conservation planning and priority-setting efforts that include a broad range of stakeholders and have a program to take into account the results of these efforts in planning.	Recommendation: The SFI Standard needs to be cleaned up and expanded with specific, auditable language that leads to greater consistency and transparency across the system.		2	The Task Groups agree that standard language should be auditable and performance based where appropriate and that guidance should be as clear and transparent as possible and will be considering these concepts throughout the standard review with the goals of improving on existing language and ensuring consistency with any new language adopted. Various throughout where appropriate. The comments submitted do not provide specific recommendations for standard language changes.	Various throughout where appropriate. The comments submitted do not provide specific recommendations for standard language changes.

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The 2015-2019 SFI Standard Review Process is an important opportunity for the SFI to finally correct fundamental shortcomings in the SFI Standard and other important aspects of the SFI Program -- including problems that serve to mislead consumers and greenwash environmentally and socially destructive and unacceptable forestry practices. Consumers should be able to trust that forest product eco-labels are managed by genuinely independent and balanced organizations, and provide a reliable means of identifying wood, paper, and products from forests where core ecological and social values are protected and restored, and controversial and unnecessarily destructive management practices are avoided. While the SFI has yet to truly provide such assurances, it can and should use the Standard Review Process to chart a new course. Thus, as the SFI's Review Process website invites, Forest Ethics and the Washington Forest Law Center are submitting the following comments on the 2010-2014 SFI Standard and other SFI Program Requirements (based on the "full package" version available on the SFI website, some sections of which were updated in January 2011). SFI Standard - The following problems are among those which should be corrected. Overall, the Standard fails to require substantial, fundamental reform of prevailing industrial forestry practices – the very same practices that have decimated many wildlife species and their habitats, degraded water quality and other key forest ecosystem components and resources, and even converted forests to other land uses. For more detail, see the following discussion. Relevant SFI provisions: The problem runs throughout the SFI Standard.			2	These comments are general criticisms on many aspects of the SFI Standard and program. The comments submitted do not accurately describe existing standard requirements and do not provide specific recommendations for standard language changes. Specific comments regarding these issues will be reviewed and resolved where they are provided with recommendations for the current or proposed new standard provisions.	None.

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The SFI Standard lacks sufficient performance measures for specific outcomes in certified forests, thereby allowing almost any legal forestry practice to comply with the Standard, no matter how problematic or unsustainable. The Standard frequently fails to specify required outcomes for forest management, conservation, and restoration. Instead, the Standard often just requires verification of whether timber companies have a program or policy to address an issue—with no requirement for how the issue is actually addressed. As a result, the Standard neither provides much consistency in its outcomes, nor requires the types of outcomes that one might expect from reading the Standard's highest level language. For example, the performance measures and indicators for sustainable harvest levels require forest plans and "long term resource analysis," but do not define the term "sustainable harvest" nor preclude resource depletion, i.e., that harvest levels do not exceed growth levels. Similarly, the performance measures and indicators for protection of water quality and water resources largely just require development and implementation of riparian protection measures and compliance with state "best management practices" (BMP); particular rates of BMP compliance are not required, nor are any particular outcomes required in terms of actual water quality and water resource conditions. Likewise, the performance measures and indicators for conservation of biological diversity and "forests with exceptional conservation value" largely just require programs to promote conservation of biological diversity, programs to protect threatened and endangered species, retention of stand level habitat elements such as snags, participation in regional programs to conserve old growth, and so on. While these requirements may sound reasonable and rational, no particular outcomes are required in terms of endangered species protection, old growth protection, habitat feature retention, etc. Rather, SFI auditors are left focusing on whether companies have programs in place, regardless of whether the programs actually serve to protect the ecological values in question. The guidance in the SFI Standard does virtually nothing to change this situation. Relevant SFI provisions: Widespread throughout the SFI			2	These comments are general criticisms on many aspects of the SFI Standard and program. The comments submitted do not provide specific recommendations for standard language changes. Specific comments regarding these issues will be reviewed and resolved where they are provided with recommendations for the current or proposed new standard provisions.	None.

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The SFI standards do not address important differences in forest ecosystems in different regions. Despite being intended for usage throughout the US and Canada, the SFI Standards fail to recognize the fundamental and immense differences in forest ecology, productivity, and appropriate silvicultural and natural resource protections that exist throughout the continent. Absurdly, the SFI's requirements are no different for boreal forests in Canada and Alaska, redwood forests in California, forests in the US Interior West, or pine forests in the Southeast US. Relevant SFI provisions: The problem runs throughout the SFI Standard.				The SFI Standard was designed specifically for the U.S. and Canada and does fully consider the differences in forest types, ecology, practices, throughout North America. That is one of the advantages that the SFI Standard has with both systems based and performance based requirements. Systems are designed to produce the desired outcome (e.g. protect water quality), not prescribe each and every practice as they can vary from region to region. Where practical, prescriptive or performance based approaches (e.g. used trained loggers) can be included in a standard when/where the practice being prescribed is going to be the same wherever it is used. The comments submitted do not accurately describe existing standard requirements and do not provide specific recommendations for standard language changes.	None.

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PRINCIPLES FOR SUSTAINABLE FORESTRY					
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 and ecosystem services such as the conservation of soil, air and water quality, carbon, biological diversity, wildlife and aquatic habitats, recreation, and aesthetics.					
As forest biomass is used more frequently for fuel to fire thermal generating stations a better and documented foundation for "sustainability" will be needed. Forest Biomass is GHG neutral based on SFM. More specifically evidence to show that no carbon mining is taking place may be needed. This can be supplied by better inventory of standing volume to show stability or an increase. CFI or more frequent periodic inventory is suggested.	Document SFM by better inventory.	Consult an expert in inventory. Allow choice in method. Ensure result. Speed of growth of the forest is important. 10years for fast growing forests- perhaps 15 years for slower growing boreal forests.	2	Comment addressed by proposed revisions to Section 2 - Performance Measure 1.1.	See proposed language for Performance Measure 1.1.
Okay			3	General editorial comment	None
Clearcut size should be limited in order to maintain any level of sustainability under SFI guidelines	There are numerous clearcuts by an SFI member in SW Louisiana, in Vernon and Beauregard Parishes that can be measured in square miles instead of hundreds of acres. They are layered upon previous clearcuts that have not been planted, and measure 2-3 miles across or more.	NO CLEARCUTS OVER 120 ACRES WITHOUT MEETING GREEN UP REQUIREMENTS. NO EXCEPTIONS!	2	Current standard requirements in Objective 5, Performance Measures 5.2 and 5.3 address this comment.	None
"2. Forest Productivity and Health To provide for regeneration after harvest and maintain the productive capacity of the forest land base, and to protect and maintain long-term forest and soil productivity. In addition, to protect forests from economically or environmentally undesirable levels of wildfire, pests, diseases, invasive exotic plants and animals and other damaging agents and thus maintain and improve long-term forest health and productivity."					

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Change sentence "In addition, to protect forests from economically or environmentally undesirable...."	The term "environmentally undesirable" is too vague to be of use because environment typically refers to the variables of temperature, lights, moisture, etc.. A better term would be "ecologically undesirable".	In addition, to protect ecological and economic functioning of forest land from undesirable levels of damaging agents such as invasive, non-native species, pests, diseases, wildlife, and climate change to maintain and improve long-term forest ecosystem function and productivity.		During the first comment period the Standard Review task groups focused on comments regarding Section 2 Objectives 1-20. Comments received on the Principles are being reserved for review by the task groups during the second public comment period. The goal is to ensure that changes to the objectives have been fully considered so that they can be properly aligned to any changes to the Principles based on the comments received. As such disposition of the Principles comments are not included in this draft.	
SFI currently allows clear cuts of one to two thousand acres or more which are subject to massive wildfires, pests or disease	Clearcuts, regeneration and adjacency requirements MUST be strengthened to truly protect forest productivity and health	Clear cuts must be limited to 120 acres in size, and must be replanted and an average of 5 feet tall before adjacent timber can be cut	2	Current standard requirements in Objective 5, Performance Measures 5.2 and 5.3 address this comment.	None
There should be some increased emphasis on active fuel reduction or mitigation where heavy fuel loading causes a high wildfire hazard.	High fuel loading can be reduced or mitigated. High wildfire risk caused by high fuel loading poses a risk to forest sustainability and community not only of the SFI member but adjacent landowners as well.	Active fuel reduction or mitigation is to be emphasized where heavy fuel loading causes a high wildfire hazard.	2	Comment addressed with proposed changes to Indicator 4.1.9.	See proposed language for Indicator 4.1.9.
SFI requirements directly address Productivity and Health and makes this an important part of their requirements			3	General Editorial comment	none
Awkward wording. Too many concepts in tangled sentences.	Make it understandable.			During the first comment period the Standard Review task groups focused on comments regarding Section 2 Objectives 1-20. Comments received on the Principles are being reserved for review by the task groups during the second public comment period. The goal is to ensure that changes to the objectives have been fully considered so that they can be properly aligned to any changes to the Principles based on the comments received. As such disposition of the Principles comments are not included in this draft.	

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3. Protection of Water Resources To protect water bodies and riparian zones, and to conform with best management practices to protect water quality.					
okay			3	General Editorial comment	none
Excessive clearcuts are being done under the auspices of the SFI program, negatively impacting hydrology and stream flow, and denuding Riparian Zones	Massive clearcuts are being done in Louisiana, and harvesting where all timber is being removed from riparian zones allowing for flashy flow after rain events, lower water flow during dry periods, and thermal pollution of waterways,.	Clearcuts must be limited to 120 acres in size, and must be replanted and an average of 5 feet tall before adjacent timber can be cut, and Riparian Zones should maintain as a minimum, where the forest cover is present before harvest, 50 sq. ft. per acre of basal area, or 50% crown cover	2	Comment regarding clearcuts addressed by requirements of Performance Measure 5.2 and 5.3. Comment regarding riparian zones addressed by proposed language for Performance Measure 3.2 in Section 2, and proposed definition for wetlands and riparian area in Section 13.	See language for Performance Measure 3.2 and definitions for wetland and riparian area.
What is the definition of riparian zones? Wetland protection? Definition of muskeg?	Definition of water body and riparian zone varies by jurisdiction. Wording should be clear in regards to what water source/wetland/drainage/body of water is involved and the limits of management.	To protect water bodies, riparian zones and wetlands as defined by local legislation and to conform with the best management practices as acknowledged by SFI to protect water quality.	2	Comment addressed with proposed definition for wetlands and riparian area in Section 13.	See language for Performance Measure 3.2 and definitions for wetland and riparian area.
SFI is the only certification that directly addresses and audits the whole wood fiber supply system concerning Best Management Practices concerning water resources.			3	General Editorial Comment	None
4. Protection of Biological Diversity To manage forests in ways that protect and promote biological diversity, including animal and plant species, wildlife habitats, and ecological or natural community types.					
Need to insert word "native" in front of "biological diversity"				During the first comment period the Standard Review task groups focused on comments regarding Section 2 Objectives 1-20. Comments received on the Principles are being reserved for review by the task groups during the second public comment period. The goal is to ensure that changes to the objectives have been fully considered so that they can be properly aligned to any changes to the Principles based on the comments received. As such disposition of the Principles comments are not included in this draft.	

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okay			3	General Editorial Comment	None
		Such management	3	not possible to address comment.	None
Excessive clearcutting in SW Louisiana without concern for wildlife is being done under the auspices of the SFI program	Wildlife are left without necessary habitat, which will take years or decades to recover	Wildlife corridors 300 feet in average width must be used to break up clear cuts larger than 120 acres in size, to provide benefit to wildlife and habitat diversity	2	Comment can be addressed by Performance Measures 5.2 and 5.3.	None
SFI directly addresses this item; but more than that since SFI pushes sustainability on the appropriate sites it indirectly protects the biological diverse areas.			3	General Editorial Comment	None
SFI does not accept or promote landscape scale prescribe burning, which is critically important for sustaining natural plant and wildlife communities long-term. Quail, white-tail deer, wild turkey, & many, many non-game wildlife depend on plant communities that are fire-dependent. Prescribe burning (fact sheet)- http://www.georgiawildlife.com/sites/default/files/uploads/wildlife/hunting/pdf/PrivateLands/20110131ed FSP Why Thin %26 Prescribe Burn Forests.pdf	Herbicides cannot completely replace prescribe fire as a management tool. Prescribe fire closely mimics a natural process that sustains forest health and biological diversity. Prescribe burning (natural ecology of fire in Southeast US forests)- http://www.talltimbers.org/fedb-intro.html	Please contact experts from across the Southeast US who are knowledgeable about forests, wildlife, & fire ecology, such as persons serving at Tall Timbers Research Station, on the Georgia Prescribe Fire Council, and at universities with a forest and wildlife curriculum.	2	Comment addressed with proposed changes to Indicator 4.1.9.	See proposed language for Indicator 4.1.9.
See comments under Objective 6. Also, the term "protect" often means something different to land managers than it does to the general public. To a land manager, "protection" can often mean a hands-off approach. This is problematic because in many cases proactive management is necessary to "protect" the value or feature. It would be better if SFI discontinued the use of the term "protect" and rather used "appropriately manage for" or "maintain" or "effectively address."			2	Task group considered comment and has revised Objective 4 to include much of current Objective 6 requirements.	See proposed revisions to Performance Measure 4.3 and Performance Measure 6.1.

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Auditable Language: SFI standard requirements are generally plan- or program-based, which could be implemented with varying levels of rigor. It is unclear how these are audited, and how SFI can claim any consistency in these areas of the program. Here are some of the many examples of vague, unauditable language in the standard. 4.1.1. Program to promote the conservation of native biological diversity, including species, wildlife habitats and ecological community types. 4.1.5. Program for assessment, conducted either individually or collaboratively, of forest cover types, age or size classes, and habitats at the individual ownership level and, where credible data are available, across the landscape, and take into account findings in planning and management activities. 4.1.6. Support of and participation in plans or programs for the conservation of old-growth forests in the region of ownership. Including globally vulnerable species and communities in FECV: Globally vulnerable species and communities (NatureServe G3) are at moderate risk of extinction or elimination and are not typically protected by state and provincial laws. Only if they're federally listed or state/provincially listed T&E species are they protected in some way, and many G3 species are not on state or federal lists of T&E species. No G3 communities are covered by current law. Current SFI language referencing programs to conserve stand and landscape-level biodiversity is not specific enough to get at this issue.	The SFI Standard needs to be cleaned up with clear, auditable, performance and outcome-based language that creates more consistency and transparency across the system and includes more transparent guidance for assessing rigor of such programs and processes.	Expand definitions of FECV to include all globally vulnerable species and communities.	2	The Task Groups agree that standard language should be auditable and performance based where appropriate and that guidance should be as clear and transparent as possible and will be considering these concepts throughout the standard review with the goals of improving on existing language and ensuring consistency with any new language adopted. he comments submitted do not provide specific recommendations for standard language changes.	Various throughout where appropriate. The comments submitted do not provide specific recommendations for standard language changes.
Objective 4. Performance Measure 4.1 Indicator I: Focus on species rather than ecological types as is the case in Indicators 2 and 3.	To be consistent with the other Indicators of Performance Measure 4.1.	PM 4.1 Indicator 1: Program to promote the conservation of native biological diversity, including, species and wildlife habitats.	2	Comment addressed by proposed language for Indicator 4.1.1.	See proposed language for Indicator 4.1.1.
There is a certain level of redundancy among some of the objectives, the document could be substantially reduced through combining similar and overlapping objectives, such as 4 and 11.			3	General Editorial Comment	None
5. Aesthetics and Recreation To manage the visual impacts of forest operations, and to provide recreational opportunities for the public.					

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Aesthetics and Recreation should be separated into two numbered goals, instead of one. Cultural and historic uses should be valued and promoted, not just for "indigenous" people, but all people that have traditionally used the forests for: recreation, hunt/gather, exposure to nature, wildlife viewing, etc. Sustainable forestry must maintain the connection between the forests and the people.	Item 5 is weak and lumps two very divergent items into one afterthought. Aesthetics can stand alone. Recreation along with traditional and cultural uses should have their own item in the standard. In the current standard, traditional and cultural uses are not addressed unless it is required by law or on public lands. Many communities have traditional practices that are threatened by wholesale private ownership of forests. How can we have a "sustainable" label if "sustainable communities" and their traditions and quality of life are ignored. Sustainable forestry maintains the connection between the forests and the people. The Montreal Process is not being met by the current SFI standard: 6.Maintenance and enhancement of long-term multiple socio-economic benefits to meet the needs of societies.	5) Manage the visual impacts of operations. 6) Provide recreation opportunities for the public and promote cultural, traditional and historic use by the public. Sustainable practices maintain the connection between the forests and the people.		During the First Comment Period for the SFI 2015-2019 review process those submitting comments for Section 2 - SFI 2010-2014 were requested to focus their comments on the requirements of Objectives 1-20. In light of this comments received regarding the SFI Principles have not had responses prepared. Comments regarding SFI Principles will have responses prepared at the conclusion of the second comment period.	
okay			3	General Editorial Comment	None
Aesthetics need to be considered on a site specific basis based on the visual sensitivity of the site.	That which looks unsightly may provide ecological niches. Examples: high stumps, high slash, root wads, some ruts. Ecological opportunities may outweigh a sense of aesthetics on sites with low visual sensitivity	Management/harvest plans consider ecological opportunities that might be created by leaving various conditions that might be considered unsightly on site subject to high levels of visual sensitivity.	2	Current language in Objectives 2, 4 and 5 allow for what the comment is proposing. See proposed language in Performance Measures 4.1, 4.2 and 4.3.	See proposed language 4.1, 4.2 and 4.3
SFI Standard should be changed to require aesthetic and recreation considerations on ALL harvests	Clear cuts in excess of a thousand acres along state highways in Louisiana are impacting hunting leases and aesthetics	Clear cuts should be limited to 120 acres in size, and where significant public exposure exists, additional aesthetic considerations must be implemented	2	Comment can be addressed by Performance Measures 5.2 and 5.3.	None

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Forest companies do not always have the mandate to manage recreation. `	Standard should not require managers of the forest to manage recreation if the mandate does not exist.	To manage the visual impacts of forest operations, and to provide recreational opportunities for the public where in accordance with state/provincial/local plans.		During the first comment period the Standard Review task groups focused on comments regarding Section 2 Objectives 1-20. Comments received on the Principles are being reserved for review by the task groups during the second public comment period. The goal is to ensure that changes to the objectives have been fully considered so that they can be properly aligned to any changes to the Principles based on the comments received. As such disposition of the Principles comments are not included in this draft.	
Additional wording.	Too broad of a statement.	...consistent with resource protection and landowner objectives.		During the first comment period the Standard Review task groups focused on comments regarding Section 2 Objectives 1-20. Comments received on the Principles are being reserved for review by the task groups during the second public comment period. The goal is to ensure that changes to the objectives have been fully considered so that they can be properly aligned to any changes to the Principles based on the comments received. As such disposition of the Principles comments are not included in this draft.	
6. Protection of Special Sites To manage forests and lands of special significance (ecologically, geologically or culturally important) in a manner that protects their integrity and takes into account their unique qualities.					

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The wording only talks about protection of sites; it does nothing to promote continued cultural use of special sites.	Culturally significant forests and lands should have continued and ongoing cultural or traditional use. Land that has been used for centuries could be closed to entry to the very peoples(whether indigenous or not) that have made the area culturally significant in the current standard. If there were a culturally significant foraging area, for example, the standard only protects the area not the berry picking activity that made it significant in the first place. Protecting an area, and not protecting the activity is not "sustainable". Sustainable forestry maintains the connection between the forests and the people. The Montreal Process requires stronger socio-economic language: 6.Maintenance and enhancement of long-term multiple socio-economic benefits to meet the needs of societies.	Culturally significant areas are managed to maintain ongoing traditional activities.		During the first comment period the Standard Review task groups focused on comments regarding Section 2 Objectives 1-20. Comments received on the Principles are being reserved for review by the task groups during the second public comment period. The goal is to ensure that changes to the objectives have been fully considered so that they can be properly aligned to any changes to the Principles based on the comments received. As such disposition of the Principles comments are not included in this draft.	
okay			3	General Editorial Comment	None
This would be strengthened by mentioning specific site categories to avoid impacting such as those that are recognized as Key Biodiversity Areas and Alliance for Zero Extinction Sites.	Will strengthen biodiversity argument in favor of SFI standards. There should be a recognition that some areas are best "managed" by not managing them at all.	Such lands to include Key Biodiversity areas, Alliance for Zero Extinction sites, and other irreplaceable areas.		During the first comment period the Standard Review task groups focused on comments regarding Section 2 Objectives 1-20. Comments received on the Principles are being reserved for review by the task groups during the second public comment period. The goal is to ensure that changes to the objectives have been fully considered so that they can be properly aligned to any changes to the Principles based on the comments received. As such disposition of the Principles comments are not included in this draft.	

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protection does not necessarily mean off -limits to sustainable use.	For example in the Boreal, maintaining ecological processes is key to functioning of the ecosystem. A hands off approach that excludes fire from the landscape does not keep the cycles of disturbance so vital to forest health.	...in a manner that maintains their integrity and takes into account their unique qualities		During the first comment period the Standard Review task groups focused on comments regarding Section 2 Objectives 1-20. Comments received on the Principles are being reserved for review by the task groups during the second public comment period. The goal is to ensure that changes to the objectives have been fully considered so that they can be properly aligned to any changes to the Principles based on the comments received. As such disposition of the Principles comments are not included in this draft.	
Again this is similar to no. 4 above; since SFI promotes sustainability the "Special Sites" are better protected.				During the first comment period the Standard Review task groups focused on comments regarding Section 2 Objectives 1-20. Comments received on the Principles are being reserved for review by the task groups during the second public comment period. The goal is to ensure that changes to the objectives have been fully considered so that they can be properly aligned to any changes to the Principles based on the comments received. As such disposition of the Principles comments are not included in this draft.	
7. Responsible Fiber Sourcing Practices in North America To use and promote among other forest landowners sustainable forestry practices that are both scientifically credible and economically, environmentally and socially responsible.					

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Socially responsible is not defined. Is it socially responsible to ban traditional and historic use from land? or charge entry fees after a centuries of traditional or historic use?	There is no definition of socially responsible. Add separate item to define socially responsible. The Montreal Process states: 6.Maintenance and enhancement of long-term multiple socio-economic benefits to meet the needs of societies.	Socially responsible means sustaining the cultural connections between the forests and the people, while promoting quality of life in communities.		During the first comment period the Standard Review task groups focused on comments regarding Section 2 Objectives 1-20. Comments received on the Principles are being reserved for review by the task groups during the second public comment period. The goal is to ensure that changes to the objectives have been fully considered so that they can be properly aligned to any changes to the Principles based on the comments received. As such disposition of the Principles comments are not included in this draft.	
Okay			3	General Editorial Comment	None
This is SFI's strong point. It pushes in the requirements and audits to practice responsible fiber sources.			3	General Editorial Comment	None
Be aware of EU and UK requirements when modifying procurement standard. Make sure procurement system's Certifiable Monitoring System conforms to DDS/controlled wood requirements.	Pellet industry shipping to Europe need to meet requirements with SFI Procurement System Certification.	Meet Legality, HCV, Soil and Water conservation, High Carbon Stock Conversion, and Social aspects on purchased wood.	2	Comment relates to items addressed in existing language or proposed revisions to SFI Section 2 - Objectives 2, 3, 4 and in SFI Section 3 and SFI Section 4 and definitions of illegal logging and controversial sources.	See proposed revisions to language in SFI Section 2 Objectives 2, 3, 4 and SFI Section 3 and SFI Section 4 and revised definitions for illegal logging and controversial sources.
While this principle applies to fibre from managed forest land it does not address fibre coming from non-managed forests such as new developments for industry, commerce, residence.	Fibre sources from forestland clearing can be significant for some companies, and this fibre should be used to avoid it from being wasted.	To use all available fibre from non-managed forests (clearing for development) and to use and promote among other managed forest landowners sustainable forestry practices that are both scientifically credible and economically, environmentally and socially responsible.		During the first comment period the Standard Review task groups focused on comments regarding Section 2 Objectives 1-20. Comments received on the Principles are being reserved for review by the task groups during the second public comment period. The goal is to ensure that changes to the objectives have been fully considered so that they can be properly aligned to any changes to the Principles based on the comments received. As such disposition of the Principles comments are not included in this draft.	

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Change wording.	This is about promoting the use of sustainable forestry practices to landowners, not the use of those practices.	To promote scientifically credible and economically, environmentally, and socially responsible sustainable forestry practices to forest landowners.		During the first comment period the Standard Review task groups focused on comments regarding Section 2 Objectives 1-20. Comments received on the Principles are being reserved for review by the task groups during the second public comment period. The goal is to ensure that changes to the objectives have been fully considered so that they can be properly aligned to any changes to the Principles based on the comments received. As such disposition of the Principles comments are not included in this draft.	
Labeling: The SFI Certified Sourcing Label continues to confuse the marketplace and lack transparency, in terms of the wide range of practices that can be behind the label. These can vary greatly, across what are considered "responsible sources", from SFI or CSA certified lands, to 100% pre-consumer materials, to SFI Fiber Sourcing. Beyond BMPs and using trained loggers, SFI Fiber sourcing standard is based wholly on outreach and education and does not provide assurances on even the most basic elements of responsible forestry (sustained yield, rare species conservation, sound silviculture, etc.), traceability, or avoidance of some controversial sources such as conversion.	SFI certified sourcing label requirements should be strengthened significantly or the label done away with entirely, as it is misleading in the marketplace to have a label that looks similar to other SFI labels, but the vast majority of fiber currently covered by it does not have any association with certified forest management fiber content.		2	Comment addressed in responses for Section 4.	See response in Section 4.
8. Avoidance of Controversial Sources including Illegal Logging in Offshore Fiber Sourcing To avoid wood fiber from illegally logged forests when procuring fiber outside of North America, and to avoid sourcing fiber from countries without effective social laws.					
Okay but what about domestic illegal sourcing?			2	Comment addressed in proposed language for Performance Measure 15.1 and Indicators 15.1.4 and 15.1.5, revised definition of illegal logging and revised definition of controversial sources.	See proposed language for Performance Measure 15.1 and Indicators 15.1.4 and 15.1.5, revised definition of illegal logging and revised definition of controversial sources.
This is addressed in the requirements and followed up in the audits.			3	General editorial comment	None

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Avoiding illegally logged wood is not strong enough.	the standard is weak if it condones illegal logging.	Illegally logged forests will not be used as a fibre source.	2	Comment addressed in current language of SFI Standard - by definition illegally logged fiber cannot be used as a fiber source.	None
Auditable Language: SFI standard requirements are generally plan- or program-based, which could be implemented with varying levels of rigor. It is unclear how these are audited, and how SFI can claim any consistency in these areas of the program. Here are some of the many examples of vague, unauditable language in the standard. 8.1.2 "Program to address Forests of Exceptional Conservation Value in harvests with purchased stumpage" .	The SFI Standard needs to be cleaned up with clear, auditable, performance and outcome-based language that creates more consistency and transparency across the system and includes more transparent guidance for assessing rigor of such programs and processes.		2	The Task Groups agree that standard language should be auditable and performance based where appropriate and that guidance should be as clear and transparent as possible and will be considering these concepts throughout the standard review with the goals of improving on existing language and ensuring consistency with any new language adopted. he comments submitted do not provide specific recommendations for standard language changes.	Various throughout where appropriate. The comments submitted do not provide specific recommendations for standard language changes.
"9. Legal Compliance To comply with applicable federal, provincial, state, and local forestry and related environmental laws, statutes, and regulations."					
ditto			3	General editorial comment	None
okay			3	General editorial comment	None
"10. Research To support advances in sustainable forest management through forestry research, science and technology."					
I don't think anybody else pushes research in the area of sustainability.			3	General editorial comment	None
okay			3	General editorial comment	None
"11. Training and Education To improve the practice of sustainable forestry through training and education programs."					
Another strong point			3	General editorial comment	None
Great benefit of the SFI program. Training and education programs are a core aspect of sustainable forestry.			3	General editorial comment	None
okay			3	General editorial comment	None
The focus should not just be on "replanting and regrowing trees". Sustainable forestry must maintain the connection between the forests and the people.			3	Comment not related to Principle 11 - Training and Education	None

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We view training and education programs as a core aspect of sustainable forestry and support SFI's continued investment in training. We would like to see more of the on-the-ground results of such training programs reported more broadly.			3	General editorial comment	None
"12. Public Involvement To broaden the practice of sustainable forestry on public lands through community involvement."					
okay			3	General editorial comment	None
The education, training etc. are all required and audited by SFI			3	General editorial comment	None
no change. This is a real strength of SFI, to involve the public and be publicly transparent. A major competing certification process is NOT this open.			3	General editorial comment	None
The standard needs to more strongly state that sustainable forestry promotes the connection between the forests and the people.	Community involvement needs to strengthen the connections between communities and the forest.	To broaden the practice of sustainable forestry on public lands through community involvement to maintain the connection between the forests and the people		During the first comment period the Standard Review task groups focused on comments regarding Section 2 Objectives 1-20. Comments received on the Principles are being reserved for review by the task groups during the second public comment period. The goal is to ensure that changes to the objectives have been fully considered so that they can be properly aligned to any changes to the Principles based on the comments received. As such disposition of the Principles comments are not included in this draft.	
"13. Transparency To broaden the understanding of forest certification to the SFI 2010-2014 Standard by documenting certification audits and making the findings publicly available."					

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As a member of the public I could not find the SFI plans of my nearby forests.	SFI reports should all be online, not just audits, but all SFI plans. How does the public know if the plan is being followed if they cannot see it?	To broaden the understanding of forest certification to the SFI Standard by documenting certification audits and making findings and PLANS publicly available.		During the first comment period the Standard Review task groups focused on comments regarding Section 2 Objectives 1-20. Comments received on the Principles are being reserved for review by the task groups during the second public comment period. The goal is to ensure that changes to the objectives have been fully considered so that they can be properly aligned to any changes to the Principles based on the comments received. As such disposition of the Principles comments are not included in this draft.	
okay			3	General editorial comment	None
Results of all audits and complaints needs to be readily available to the public			2	SFI Section 10 - Communications and Public Reporting requires that the SFI Public Summary Audit Report is posted to the SFI website and SFI Section 11 - Public Inquires and Official Complaints requires that the complainant is given the results of any official complaints, hence they are available to the public.	
"14. Continual Improvement To continually improve the practice of forest management, and to monitor, measure and report performance in achieving the commitment to sustainable forestry."					
Currently Conversion is covered ineffectively in associated interpretations document. In Objective 4 , landowners selling fiber from stands being converted from forestland (working forest) to non-forest uses should be required to notify SFI program participants to enable accurate classification of the material as inputs to various Chain of Custody systems. The current 2010-2014 does not adequately address this issue which often leads to conversion harvest volume to be classified as SFI Certified which threatens the integrity of the SFI Brand and puts CoC participants in the award position of potentially making claims under PEFC that are not correct. It is time for SFI to address conversion or risk falling further behind other credible certification programs.			2	Comment addressed by proposed language for Performance Measures 1.2 and 1.3.	See proposed language for Performance Measures 1.2 and 1.3.

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okay			3	General editorial comment	None
Separate Aesthetics and Recreation into two objectives: Add objective promoting cultural and traditional uses of the forest. Sustainable practices should connect the forests with the people.				During the first comment period the Standard Review task groups focused on comments regarding Section 2 Objectives 1-20. Comments received on the Principles are being reserved for review by the task groups during the second public comment period. The goal is to ensure that changes to the objectives have been fully considered so that they can be properly aligned to any changes to the Principles based on the comments received. As such disposition of the Principles comments are not included in this draft.	
This doesn't add any value to the standard because it is largely meaningless and duplicates #13 in the reporting requirement.				During the first comment period the Standard Review task groups focused on comments regarding Section 2 Objectives 1-20. Comments received on the Principles are being reserved for review by the task groups during the second public comment period. The goal is to ensure that changes to the objectives have been fully considered so that they can be properly aligned to any changes to the Principles based on the comments received. As such disposition of the Principles comments are not included in this draft.	
Objective 1. Forest Management Planning. To broaden the implementation of sustainable forestry by ensuring long-term forest productivity and yield based on the use of the best scientific information available.					
okay			3	General editorial comment.	None

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Sustained yield: To come up with accurate sustained yield levels, standards should require: 1)Removal of areas that reduce potential harvest levels (FECVs, riparian areas, special sites); 2)Removal of species from growth calculations that are a large component of the forest and do not have commercial value (e.g., tan oak in the Pacific Northwest) 3)Calculations of sustained yield by management units and forest types 4)Defined timelines, such that over-harvest cannot be repeated over time. If SFI does not include these types of provisions, certified landowners could be over-cutting within a given forest type or for an entire management unit over time. Furthermore, the current language around long-term in the standard/glossary leaves it open to harvest more than growth over a rotation or longer. This is one of the fundamentals of "sustainable forestry".	Adopt more specific language around sustained yield that ensures that overharvesting does not occur.	Adopt more specific language around sustained yield that ensures that overharvesting does not occur.	2	1. this is current practice for harvest modelling; 2) not possible to determine over the course of a full plan cycle what species will have commercial value and which will not; 3) this is current practice for harvest modelling; 4) agreement to address comment.	Numbers 1 -3 no change to requirements. Number 4 - see proposed changes to Objective 1 in draft standard.
This is another part or maybe even the core of why SFI is the certification body that pushes sustainability.			3	General editorial comment.	None
Performance Measure 1.1. Program Participants shall ensure that forest management plans include long-term harvest levels that are sustainable and consistent with appropriate growth-and-yield models.					
okay			3	General editorial comment.	None
see above			3	General editorial comment.	None
Improvements to inventory mapping by use of modern technology and other methods must be implemented to ensure growth and yield models are accurate and dependable. Random field testing of these models must be conducted to identify areas of concerns and outages so they can be amended within the Forest Management Phrase Periods.			2	Standard currently addresses these items with Objective 1. Forest Management Planning, Indicator 1.1.1.	None
PM 1.1 Indicators:					
1. Forest management planning at a level appropriate to the size and scale of the operation, including:					
need to include hazardous fuels removal in "h"			2	Agreement to address comments.	See revisions in Objective 7 of draft standard.

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	The SFI fails to require one of the most basic tenets of sustainability – that resources not be depleted over time. The SFI Standard fails to clearly require the most important aspect of sustainable harvest for timber and other forest products: that harvest volumes not exceed growth volumes within each planning unit during appropriate time periods. The Standard does include a Performance Measure calling for “forest management plans [that] include long-term harvest levels that are sustainable…” and an indicator calling for use of “a long term resource analysis.” However, the Standard does not define the term “sustainable harvest” nor do any indicators specify how sustainable harvest levels are to be calculated with regard to the relationship between harvest and growth rates. Thus any harvest rate can be found in compliance with the Standard, including those that greatly reduce timber stocking levels in the short and/or long term.		2	Task Group discussed if additional clarity was necessary regarding "long term" sustainable harvest levels. Task group decided that existing definition of "long-term" is adequate.	None
okay			3	General editorial comment.	None

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	Sustained yield: To come up with accurate sustained yield levels, standards should require: 1) Removal of areas that reduce potential harvest levels (FECVs, riparian areas, special sites); 2) Removal of species from growth calculations that are a large component of the forest and do not have commercial value (e.g., tan oak in the Pacific Northwest) 3) Calculations of sustained yield by management units and forest types 4) Defined timelines, such that over-harvest cannot be repeated over time. If SFI does not include these types of provisions, certified landowners could be over-cutting within a given forest type or for an entire management unit over time. Furthermore, the current language around long-term in the standard/glossary leaves it open to harvest more than growth over a rotation or longer. This is one of the fundamentals of "sustainable forestry". Current Language: 1.1.1.g. recommended sustainable harvest levels for areas available for harvest; 1.1.2. Documentation of annual harvest trends in relation to the sustainable forest management plan in a manner appropriate to document past and future activities. Recommendation: Adopt more specific language around sustained yield that ensures that overharvesting does not occur.		2	The Review Committee respectfully disagrees that sustainable harvest levels are not adequately covered in the standard. Sustainable harvest levels and specific provisions regarding their development, documentation and review are included throughout Objective 1. The two provisions cited in these comments, 1.1.1.g and 1.1.2 do address the commenters' concerns. 1. Removal of areas that reduce potential harvest levels from calculations of sustainable harvest levels. This is covered in 1.1.1.g with the key phrase "for areas available for harvest". 2. Removal of species from growth calculations that are a large component of the forest and do not have commercial value. This is covered in PM 1.1 with the key language "appropriate growth-and-yield models". Use of models that include non commercial species to justify higher harvest levels of commercial species would result in a non conformance for this indicator. 3. It is common practice for determining sustainable harvest levels by management unit and forest types. This is also covered in 1.1.1 with the key language "Forest management planning at a level appropriate to the size and scale of the operation..."	**None.**

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Sustained yield: To come up with accurate sustained yield levels, standards should require: 1)Removal of areas that reduce potential harvest levels (FECVs, riparian areas, special sites); 2)Removal of species from growth calculations that are a large component of the forest and do not have commercial value (e.g., tan oak in the Pacific Northwest) 3)Calculations of sustained yield by management units and forest types 4)Defined timelines, such that over-harvest cannot be repeated over time. If SFI does not include these types of provisions, certified landowners could be over-cutting within a given forest type or for an entire management unit over time. Furthermore, the current language around long-term in the standard/glossary leaves it open to harvest more than growth over a rotation or longer. This is one of the fundamentals of "sustainable forestry".	Adopt more specific language around sustained yield that ensures that overharvesting does not occur.	Adopt more specific language around sustained yield that ensures that overharvesting does not occur.	2	1. this is current practice for harvest modelling; 2) not possible to determine over the course of a full plan cycle what species will have commercial value and which will not; 3) this is current practice for harvest modelling; 4) agreement to address comment.	Numbers 1 -3 no change to requirements. Number 4 - see proposed changes to Objective 1 in draft standard.
2. Documentation of annual harvest trends in relation to the sustainable forest management plan in a manner appropriate to document past and future					
Sustained yield: To come up with accurate sustained yield levels, standards should require: 1)Removal of areas that reduce potential harvest levels (FECVs, riparian areas, special sites); 2)Removal of species from growth calculations that are a large component of the forest and do not have commercial value (e.g., tan oak in the Pacific Northwest) 3)Calculations of sustained yield by management units and forest types 4)Defined timelines, such that over-harvest cannot be repeated over time. If SFI does not include these types of provisions, certified landowners could be over-cutting within a given forest type or for an entire management unit over time. Furthermore, the current language around long-term in the standard/glossary leaves it open to harvest more than growth over a rotation or longer. This is one of the fundamentals of "sustainable forestry".	Adopt more specific language around sustained yield that ensures that overharvesting does not occur.	Adopt more specific language around sustained yield that ensures that overharvesting does not occur.	2	1. this is current practice for harvest modelling; 2) not possible to determine over the course of a full plan cycle what species will have commercial value and which will not; 3) this is current practice for harset modelling; 4) agreement to address comment.	Numbers 1 -3 no change to requirements. Number 4 - see proposed changes to Objective 1 in draft standard.
This is audited and checked			3	General editorial comment.	None
what are annual harvest trends?			2	This is a well used and known term.	None

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	Conversion: The SFI standard does not have a specific requirement or prohibition related to conversion – only the unauditable language in 2.1.6 below. The ATFS standard, which SFI recognizes, also does not have a specific prohibition on forest conversion. However, fiber from such conversion sources must be discounted from SFI input credits and PEFC ST 1003:2010 and subsequent interpretations state that, "Conversion of forests to other types of land use, including conversion of primary forests to forest plantations, shall not occur unless in justified circumstances… (Criterion 5.1.1) In addition, their interpretations document states that, "Forest plantations established by a conversion after 31 December 2010 in other than justified circumstances do not meet the requirement and are not eligible for certification." SFI Jan 2013 Interpretations document section 2.2 includes additional clarification and restrictions around conversion, but it is unclear how these factors are currently audited or what are the thresholds for these factors, e.g., that conversions could be allowed "in justified circumstances where the program can document that ecological impacts are 'not significant' if managing for a different species mix after a final harvest". Current Language: 2.1.6: Planting programs that consider potential ecological impacts of a different species or species mix from that which was harvested.	SFI should meet the PEFC interpretations of 5.1.1 and add clear, auditable language that prohibits further plantation conversion within certified operations.	2	The Task Group has adapted the existing SFI Interpretations regarding: 1) conversion to non-forest land use and 2) conversion of one forest type to another forest type.	See proposed language at Performance Measure 1.2 and 1.3.

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	Conversion. Current Language: 2.1.6: Planting programs that consider potential ecological impacts of a different species or species mix from that which was harvested. While the rate of conversion of natural forests to plantations has slowed markedly, it is still an issue in certain parts of the country. The SFI standard does not have a specific requirement or prohibition related to conversion – only the unauditable language in 2.1.6 above. The ATFS standard, which SFI recognizes, also does not have a specific prohibition on forest conversion. However, fiber from such conversion sources must be discounted from SFI input credits and PEFC ST 1003:2010 and subsequent interpretations state that, "Conversion of forests to other types of land use, including conversion of primary forests to forest plantations, shall not occur unless in justified circumstances… (Criterion 5.1.1) In addition, their interpretations document states that, "Forest plantations established by a conversion after 31 December 2010 in other than justified circumstances do not meet the requirement and are not eligible for certification."	Recommendation: SFI should meet the PEFC interpretations of 5.1.1 and add clear, auditable language that prohibits further plantation conversion within certified operations.	2	The Task Group has adapted the existing SFI Interpretations regarding: 1) conversion to non-forest land use and 2) conversion of one forest type to another forest type.	See proposed language at Performance Measure 1.2 and 1.3.

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	Sustained yield. Current Language: 1.1.1.g. recommended sustainable harvest levels for areas available for harvest; 1.1.2. Documentation of annual harvest trends in relation to the sustainable forest management plan in a manner appropriate to document past and future activities. First and foremost, the SFI Standard does not actually require adherence to sustainable harvest levels – only related documentation. Secondly, to derive accurate sustained yield levels, standards should require: 1) removal of sensitive areas not typically harvested (FECVs, riparian areas, special sites) and for which growth and volume should not figure into sustainability of harvest; 2) removal of species from growth calculations that are a large component of the forest and do not have commercial value (e.g., tan oak in the Pacific Northwest); 3) calculations of sustained yield by management units and forest types; and, 4) timeframe for assessing sustained yield, with rationale. Without these types of provisions, certified landowners could be over-cutting within a given forest type or for an entire management unit over time. Recommendation: Adopt a clear requirement to adhere to documented sustainable harvest levels. Adopt more specific language around sustained yield calculations (points 1-4 above) that provides further safeguards against overharvesting.		2	The Review Committee respectfully disagrees that sustainable harvest levels are not adequately covered in the standard. Sustainable harvest levels and specific provisions regarding their development, documentation and review are included throughout Objective 1.The two provisions cited in these comments, 1.1.1.g and 1.1.2 do address the commenters' concerns. 1. Removal of areas that reduce potential harvest levels from calculations of sustainable harvest levels. This is covered in 1.1.1.g with the key phrase "for areas available for harvest". 2. Removal of species from growth calculations that are a large component of the forest and do not have commercial value. This is covered in PM 1.1 with the key language "appropriate growth-and-yield models". Use of models that include non commercial species to justify higher harvest levels of commercial species would result in a non conformance for this indicator. 3. It is common practice for determining sustainable harvest levels by management unit and forest types. This is also covered in 1.1.1 with the key language "Forest management planning at a level appropriate to the size and scale of the operation..." 4. Annual evaluations of the harvest trends are required in 1.1.2, periodic updates of inventory and recalculation of planned harvest to account for changes are required in 1.1.4 and actual practices must be documents and consistent with assumptions in the harvest plans in 1.1.5	**None.**

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	The SFI does not prohibit certified landowners from converting their forests to non-forest conditions, including subdivisions and other non-forest land uses. The SFI Standard contains no provisions prohibiting certified companies from converting forestlands to subdivisions, intensive recreation, surface mines, or other non-forest land uses, thereby reducing the natural resource land base and impacting forest landscapes, habitats, and biodiversity. Such conversion is arguably the most unsustainable thing that can happen to a forest, even from a narrow timber production perspective. While SFI has indicators that call for reforestation, and programs to conserve native biological diversity and management for other forest values could theoretically provide some indirect protection against such conversion, many of the SFI's indicators embody no particular performance expectations. There is no evidence that the indicators are being interpreted to restrict conversion. Instead, a number of prominent SFI certified companies have active land sales and development programs.		2	The Task Group has adapted the existing SFI Interpretations regarding: 1) conversion to non-forest land use and 2) conversion of one forest type to another forest type.	See proposed language at Performance Measure 1.2 and 1.3.

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	The SFI does not prohibit certified landowners from converting forests to tree plantations lacking biodiversity and other basic natural forest components. The SFI Standard contains no direct prohibitions or restrictions on the conversion of natural forests to plantations lacking various native tree species, age classes, structural diversity, wildlife habitat classes, etc. Theoretically, the biodiversity indicators calling for programs to promote conservation of native biological diversity…, retention of "stand-level wildlife habitat elements such as snags…," and programs for "assessment of forest cover types, age or size classes, and habitats…" could be interpreted to provide some indirect limitations on forest conversion. However, as discussed above, no performance outcomes are associated with these indicators, meaning that virtually any type of forest management can be found in compliance. Instead, the SFI has extensively certified plantations – including those established on former natural forest sites in recent years.		2	The Task Group has adapted the existing SFI Interpretations regarding: 1) conversion to non-forest land use and 2) conversion of one forest type to another forest type.	See proposed language at Performance Measure 1.2 and 1.3.
Wording needs to be changed to clarify what documentation is required for audit purposes.			2	Comment addressed with proposed language for Indicator 1.1.2.	See proposed language for Indicator 1.1.2.
3. A forest inventory system and a method to calculate growth and yield.					
okay			3	General editorial comment.	None
4. Periodic updates of forest inventory and recalculation of planned harvests to account for changes in growth due to productivity increases or decreases					
okay			3	General editorial comment.	None
5. Documentation of forest practices (e.g., planting, fertilization, and thinning) consistent with assumptions in harvest plans.					

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Need to clarify that this requires annual records that silvicultural treatments identified in the growth models have actually been carried out, and not just budgeted.	It is not clear what assumptions in the harvest plan refers to.		2	Task Group believes that the requirements of the Indicator are clear. These requirements are also supported by the requirements of Performance Measures 2.1; 2.2; 2,4 and 2.5.	See proposed language for Performance Measures 2.1 and 2.2.
okay			3	General editorial comment.	None
Use this space to propose any removals or additions for Objective 1:					
Forest Inventory and Harvest Removal data should be mandatory for appropriate sized management units to prevent localized over-harvesting and deforestation.			2	This is accepted practice for harvest modeling.	None
Objective 2. Forest Productivity. To ensure long-term forest productivity, carbon storage, and conservation of forest resources through prompt reforestation, soil conservation, afforestation and other measures.					
okay			3	General editorial comment.	None
1. The stated focus of this objective is on ensuring long term forest productivity, carbon storage and other forest resources however most of the performance measurements deal with only tree/timber resources. We would also like to see some performance indicators relating to other ecological benefits/values of forests in addition to wood and timber especially on public lands. 2.This objective should also include minimizing the conversion of natural forests to plantations. 3.The SFI should consider developing a separate set of objectives for plantations and natural forests. Further, conversion of natural forests to plantations should also only occur under a very limited set of circumstances such as on a small portion of the forest inventory and only when it can be demonstrated this action will provide long term conservation benefit across the entire forest. We provide some suggestions in the additions and deletions box below for restructuring PM 2.3			2	Comment 1: Other ecological benefits from forests currently addressed in Objective 4 and 6; Comments 2&3: considered by task group which has proposed language for 1.2.	See proposed revision in draft standard at Performance Measure 1.2.
Performance Measure 2.1. Program Participants shall promptly reforest after final harvest.					

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The performance measure must identify by species and soil classification both planting and natural regeneration will take place. Proper soil classification will provide the participant with the information to determine when harvesting operation should occur summer vs winter to minimize rutting.			2	The specificity suggested by the comment is covered in the standard at Performance Measure 2.3.	None
"Final Harvest" doesn't directly apply to many selection harvest systems.	<--	Change "final harvest" to "regeneration harvest"	2	Proposed change does not improved clarity of the requirement.	None
better define "reforest".			2	Term "reforest" is widely used and understood.	None
PM 2.1 Indicators:					
1. Designation of all harvest areas for either natural regeneration or by planting.					
Delete.	Unnecessary language. Reforestation requirement is already alluded to in Indicator 2.1.2.	None	2	Indicator 2.1.1 to be retained.	None
Insert "regeneration" in front of "harvest"			2	Current language is sufficient.	None
Objective 2, Performance Measure 2.1, Indicator 1 – There is not mention of artificial seeding. Is that defined somewhere to be included with "planting?"			2	Proposed revision accepted	See proposed changes to Performance Measure 2.1 in draft standard.
okay			3	General editorial comment.	None
Some plans may include both planting and natural regeneration. Or planting is natural regeneration is not sufficient.	Indicator should be included of current acceptable practices.	Designation of all harvest areas for either natural regeneration and/or by planting.	2	Current language is sufficient.	None
2. Reforestation, unless delayed for site-specific environmental or forest health considerations or legal requirements, through planting within two years or two planting seasons, or by planned natural regeneration methods within five years.					
better define planned natural regeneration			2	Current language is sufficient.	None
In BC, Stocking Standards approved in Forest Stewardship Plans commonly require a regeneration date of 4 years from commencement of harvest for ecosystem associations requiring planting and 7 years for ecosystem associations allowing for natural regeneration.	Current wording is too prescriptive.	Reforestation, unless delayed for site-specific environmental or forest health considerations, within time frames and using tree species consistent with stocking standards established for the management unit.	2	SFI Standard requires legal compliance with silviculture standards where they are in place for public lands.	None

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Prompt reforestation is important, but the State of Alaska regs allow five to seven years, depending on where in Alaska the timberlands occur.	This is the Alaska regulation - 11 AAC 95.375, part d: Reforestation must be achieved within five years after harvest in Region I and seven years after harvest in Region II and Region III as follows: (1) in Region I, the number of vigorous, undamaged, and well distributed seedlings of commercial tree species must average at least 200 trees per acre and must have survived on site for a minimum of two years; (2) in Region II or Region III, the number of vigorous, undamaged, and well distributed seedlings of commercial tree species must average a minimum of 450 trees per acre and must have survived on site for a minimum of two years; (3) in all regions adequate reforestation means a combination of seedlings and residual trees that will meet the standards set out in this subsection and in (b) of this section; and (4) no more than 10 percent of the harvest area or contiguous areas may be below the stocking levels as set out in (1) or (2) of this subsection.	We don't need a rule change as long as the "legal requirements" exception allows the Alaska reforestation rule to be acceptable.	2	SFI Standard requires legal compliance with silviculture standards where they are in place for public lands.	None
Should also add for disposition type. Some dispositions in Alberta are for sub-surface minerals and involve the removal of trees in order to access these minerals. The company with the disposition has the liability to return the site back to a productive state, so reforestation will occur past the 5 year mark		Reforestation, unless delayed for site-specific environmental or forest health considerations, legal requirements, or disposition type through planting within two years or two planting seasons, or by planned natural regeneration methods within five years.	2	SFI Standard requires legal compliance with silviculture standards where they are in place for public lands.	None
This standard could arguably go against a standard for increasing biological diversity by reducing early successional areas.			2	Comment implies that prompt reforestation could reduce amount of forest cover in early successional stage. This would appear to be contradictory.	None

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3. Clear criteria to judge adequate regeneration and appropriate actions to correct understocked areas and achieve acceptable species composition and stocking rates for both planting and natural regeneration.					
okay			3	General editorial comment.	None
4. Minimized plantings of exotic tree species, and research documentation that exotic tree species, planted operationally, pose minimal risk.					
okay but minimum\al risk of what?			2		See proposed change to draft Indicator 2.1.4
Need to drop the requirement to minimize. Exotic species should be allowed, as long research and other information demonstrates that they pose minimal risk and impacts to native ecosystems.	Exotic tree species are not inherently bad and should not be minimized by the SFI.	The deployment of exotic species that are not native to the region shall be documented and recorded and risks to native ecosystems shall be minimized.	2	Deployment of exotic species needs to be controlled so as to minimize risk to native ecosystems.	See proposed change to draft Indicator 2.1.4
The current wording of the indicator has a strong bias against the use of exotic tree species.	Exotics due to their growth rates and productivity have the potential to produce greater volumes on smaller acreages than native species. This can offset pressure on native forests while producing the wood fiber needed to meet the worlds growing population. The use of exotic tree species should meet all regulations and be part of a structured SFM program.	Suggest rewording PM2.1.4 to "Plantings of exotic trees species should be appropriately sized within the overall landscape to minimize potential impact on native ecosystems; research documentation that exotic tree species, planted operationally, pose minimal risk; conversion of abandoned agricultural land into forest land shall be taken into consideration, whenever it adds economic, social and/or cultural value." Note that the italicized portion of the indicator is language taken from PEFC ST 1003:2010, PM 5.1.12.	2	Deployment of exotic species needs to be controlled so as to minimize risk to native ecosystems.	See proposed change to draft Indicator 2.1.4
Stronger language than "minimized" and "minimal risk" would provide clearer direction to effectively manage the use of exotic and hybrid tree species	The changes are needed to provide more direction regarding the circumstances in which exotic tree species may be used.	Use of exotic and hybrid species only if research indicates the species is non-invasive and under strict and active monitoring and no use of exotic species in public natural forests or forests with exceptional conservation value.	2	Deployment of exotic species needs to be controlled so as to minimize risk to native ecosystems.	See proposed change to draft Indicator 2.1.4
Doit-on toujours viser une réduction au minimum de la plantation d'espèces d'arbres exotiques?	Ouverture lorsque motivée (ex.: conservation ou aménagement plus léger ailleurs grâce à la production accrue avec des expèces exotiques)	none.	2	Deployment of exotic species needs to be controlled so as to minimize risk to native ecosystems.	See proposed change to draft Indicator 2.1.4
5. Protection of desirable or planned advanced natural regeneration during harvest.					

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okay			3	General editorial comment.	None
Some silviculture systems do not rely on natural advanced regeneration.	Indicator should be included of current acceptable practices.	Protection of desirable or planned advanced natural regeneration during harvest where required by reforestation plans.	2	Suggested wording does not improve clarity.	None
6. Planting programs that consider potential ecological impacts of a different species or species mix from that which was harvested.					
Conversion: The SFI standard does not have a specific requirement or prohibition related to conversion – only the unauditable language in 2.1.6 below. The ATFS standard, which SFI recognizes, also does not have a specific prohibition on forest conversion. However, fiber from such conversion sources must be discounted from SFI input credits and PEFC ST 1003:2010 and subsequent interpretations state that, "Conversion of forests to other types of land use, including conversion of primary forests to forest plantations, shall not occur unless in justified circumstances... (Criterion 5.1.1) In addition, their interpretations document states that, "Forest plantations established by a conversion after 31 December 2010 in other than justified circumstances do not meet the requirement and are not eligible for certification." SFI Jan 2013 Interpretations document section 2.2 includes additional clarification and restrictions around conversion, but it is unclear how these factors are currently audited or what are the thresholds for these factors, e.g., that conversions could be allowed "in justified circumstances where the program can document that ecological impacts are 'not significant' if managing for a different species mix after a final harvest". Current Language: 2.1.6: Planting programs that consider potential ecological impacts of a different species or species mix from that which was harvested.	SFI should meet the PEFC interpretations of 5.1.1 and add clear, auditable language that prohibits further plantation conversion within certified operations.		2	Comments considered and new language proposed to address conversion of one forest types to another forest type.	See PM 1.2 in draft Standard

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Indicator 2.1.6 is subject to auditor interpretation and really does not directly address the conversion issue. This is a big gap between FSC and SFI and it needs to be dealt with in a straight forward manor. SFI needs to define three levels of forest including: a) natural forest, b) planted forest and c) cultivated forest (plantations). These three levels would essentially be the same as FSC which has 1) natural stands, 2) semi-natural stands (planted) and principle 10 plantations.	This indicator deals with conversion of natural stands to plantations based on information obtained from the Sustainable Forestry Board's SFI® Implementation Workshop on March 23, 2005, in Charlotte, North Carolina. Based on workshop information, SFIS 2.1.6 deals with conversion of natural stands to pine plantations and should be evaluated in the context of scale (area) conversion. This interpretation was re-confirmed, by the SFI Board, at the September 22-24, 2009, SFI Conference and again by official interpretation in June 2011. Recognizing the need for clarity around "conversion", SFI would benefit from clearly defining types of forests (e.g., natural, planted, cultivated) and then associating this indicator with the ecological impacts of converting to a "cultivated" forest, which was the original intent.	Silvicultural programs that consider potential ecological impacts of changing a natural or planted forest to a cultivated forest.	2	Comments considered and new language proposed to address conversion of one forest types to another forest type.	See PM 1.2 in draft Standard
okay			3	General editorial comment.	None

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The issue of conversion frequently comes up in discussions with customers and ENGO's and the 2010-2014 Standard does not articulate SFI's position on conversion clearly; information is scattered between the standard, definitions and interpretations.	• Indicator 2.1.6 requires "Planting programs that consider potential ecological impacts of a different species or species mix from that which was harvested". The intent of this indicator is to address conversion, but conversion is not specifically mentioned.	The standard should be revised to address the conversion issue directly. Program participants should be able to find information on how to address conversion in performance measures/indicators, not interpretations/definitions. When developing performance measures/indicators for conversion, the information from the 2010 interpretation would be useful. As an alternative, SFI should also consider using language similar to that found in PEFC's Sustainable Forest Management guidelines, PEFC ST 1003:2010 as shown here: 5.1.11 Conversion of forests to other types of land use, including conversion of primary forests to forest plantations, shall not occur unless in justified circumstances where the conversion: a) is in compliance with national and regional policy and legislation relevant for land use and forest management and is a result of national or regional land-use planning governed by a governmental or other official authority including consultation with materially and directly interested persons and organisations; and b) entails a small proportion of forest type; and c) does not have negative impacts on threatened (including vulnerable, rare or endangered) forest ecosystems, culturally and socially significant areas, important habitats of threatened species or other protected areas; and d) makes a contribution to long-term conservation, economic, and social benefits.	2	Comments considered and new language proposed to address conversion of one forest types to another forest type.	See PM 1.2 in draft Standard
We suggest the use of more direct wording to encourage the planting of trees of the same species as was harvested.		Planting programs include tree species found in the harvested area and consider potential ecological impacts of planting different species.	2	Comments considered and new language proposed to address conversion of one forest types to another forest type.	See PM 1.2 in draft Standard
7. Afforestation programs that consider potential ecological impacts of the selection and planting of tree species in non-forested landscapes.					

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okay			3	General editorial comment.	None
Performance Measure 2.2. Program Participants shall minimize chemical use required to achieve management objectives while protecting employees, neighbors, the public and the environment, including wildlife and aquatic habitats.					
okay			3	General editorial comment.	None
The LRC notes that the Canadian Institute of Forestry in a 2000 paper stated as follows- The CIF/IFC advocates that: 1) Development and implementation of IPM systems must be based upon a sound understanding of ecological principles and detailed knowledge of pest life history. 2) IPM must encompass the potential for forests to sustain a range of values, recognize the diverse needs and rights of all stakeholders, and establish a balance based upon quantification of the benefits and impacts of alternative management strategies. 3) The application of any pest management tactic must be done so only within the framework of IPM. 4) Where possible, long-term, proactive management tactics should be considered before short-term direct control options. 5) Where direct control tactics are warranted, priority is given to the use of biorational products (i.e., organic products with high specificity to the pest organism, minimal toxicity and minimal persistence) versus synthetic chemical pesticides. The XXX citizens expect that the LRC will advocate for best practices and ensure that downstream harvesting opportunities are maintained now and into the future.			2	Comments considered. Comments (1) - (5) addressed by PM 2.2, with additional language proposed prohibiting WHO 1A and 1B chemicals.	See proposed new Indicator 2.2.4 in draft standard.
The focus of this performance measurement is reducing chemical use but does not prohibit the use of high risk chemicals that are toxic, persistent, and bioaccumlative in the environment or that have been banned by international agreement. These chemicals are those that may have an immediate or long-term harmful effect on the environment or its biological diversity and/or constitute or may constitute a danger to human life or health. There is also no requirement to reduce chemical use over time.	see below	see below	2	Comments considered. New language proposed prohibiting WHO 1A and 1B chemicals.	See proposed new Indicator 2.2.4 in draft standard.

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	"The SFI allows toxic chemicals to be repeatedly and extensively applied across entire forests, does not require the use of silvicultural regimes that can reduce the need for intensive chemical applications, and does not prohibit the use of the most highly hazardous chemicals. Although the SFI Standard appears to require the minimization of chemical usage, the relevant indicators only require minimization "to achieve management objectives." The standard's objectives can include management of forests via silvicultural regimes like short-rotation intensive clearcuts that inherently require extensive chemical usage, even multiple applications for one rotation. The Standard does not require the use of silvicultural practices that reduce the need for chemical applications while maintaining productivity, such as selection forestry, longer timber rotations, pre-commercial thinning, and thin and release treatments. Similarly, while an indicator does call for the use of the "least toxic and narrowest-spectrum pesticide necessary to meet management objectives," there is no prohibition on using the most highly hazardous chemicals, regardless of the company's management objectives. Some of the chemicals that are widely used in industrial forest management by SFI companies and others have far-reaching ill effects, including toxicity to non-target organisms and persistence in soils and water bodies. Relevant SFI provisions: Indicators 2.2.1 and 2.2.2. "		2	The SFI Standard allows the use of forest chemicals that have been approved by federal, state and local governments. The SFI Standard has six auditable requirements related to minimizing chemical use, including the use of least-toxic and narrowest spectrum pesticides necessary to achieve management objectives and use of integrated pest management wherever feasible. The standard also requires that pesticides be used in accordance with label requirements with the supervision of state/provincial-trained or certified applicators and that practices are appropriate for the situation, for example: notification of adjoining landowners or nearby residents concerning applications and chemicals used, designation of streamside and other needed buffer strips, monitoring of water quality or safeguards to ensure proper equipment use and protection of streams, lakes and other water bodies; and use of methods to ensure protection of threatened and endangered species. However Task Groups has recommended the prohibition of chemicals listed on the WHO 1A and 1B list.	**See proposed language for Indicator 2.2.4.**

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P. 25, PM 2.2, Indicator 1: "Minimized" is ambiguous because it is a non-quantifiable target that makes accountability difficult. It is a subjective measure and is therefore a weak indicator, although it could be used instead as a statement of intent in a pre-amble to the standards. Could SFI set maximum targets (e.g., percentage of land base treated per year) through discussion with stakeholders, broken down by regions/ecosystems/etc. to a spatial level that is meaningful to local forest managers? These would then be measurable indicators.		Proposed language: "Total amount used and percentage of land base treated with herbicides, insecticides, and fertilizer (reported separately by name of chemical) per year"	2	The task group reviewed the comment but believes that setting regional / ecosystem targets for chemical use would be very hard to implement. For example how would a SFI certified landowner account for chemical application by other players (e.g. agriculture)?	None

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	The SFI provides no performance measures to protect and restore water quality, aquatic habitats, and other watershed values in states or Provinces with weak or ineffective "best management practices" (BMPs). The Standard's provisions relating to water resources do not include any performance outcomes for water quality or other aquatic resources, nor do they provide any resource protections in the form of default stream buffer widths, prohibitions on roading and logging on steep or unstable slopes, restrictions on logging or roads when surface runoff is likely to enter streams, restrictions on logging or other management where it would increase stream temperatures or deliver sediments to waters that are on the EPA's list impaired waters under Clean Water Act section 303(d), etc. The Standard does require a "program" for management and protection of aquatic resources, and "use of experts to identify appropriate protection measures" where BMPs do not currently exist. However, no particular level of protection or restoration is required, both where BMPs do not exist, and where existing BMPs are known to be insufficient for the protection and restoration of water quality, stream flows, riparian habitats, fish and other aquatic species, and other values. Oregon's BMPs, for example, are well known as seriously deficient for these purposes, and have not been meaningfully updated to protect endangered salmon and other anadromous species or to meet clean water standards. Relevant SFI provisions: Objective 3 Protection and Maintenance of Water Resources, including Indicators 3.2.1 and 3.2.5; Performance Measure 2.3.		2	The comments provided are not accurate in describing SFI Standard requirements or the development and effectiveness of BMPs to protect water quality. State and provincial BMPs are required by the SFI Standard. These BMPs are developed at the state or provincial level using consensus based approaches. In the U.S., state BMP programs are evaluated and approved by the Environmental Protection agencies. BMPs have a long and proven track record in protecting water quality. State and provincial BMPs have very specific requirements on items mentioned by the commenter, including widths streamside management zones (buffers) and road building. The Task Group has revised language for the use of soils maps to identify soils vulnerable to compaction and use of appropriate methods to avoid excessive soil disturbance. In addtion to these existing requirements, The Task Group is also recommending the addition of a prohibition on the use of chemicals listed on the WHO 1A and 1B lists.	See proposed language for Indicator 2.3.1.

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P. 25, PM 2.2, Indicator 2: "least-toxic" and "narrowest-spectrum" are ambiguous because they are non-quantifiable targets that make accountability difficult. They are subjective measures and are therefore weak indicators, although could be used instead as a statement of intent in a pre-amble to the standards. Could SFI develop check-lists of appropriate pesticides for different forest management objectives, regionally if this is necessary? If not, then justification for the chemicals classed as "least-toxic" and "narrow-spectrum" should be documented. (The amounts of different chemicals used could be covered under proposed Indicator 1 above: "Total amount used and percentage of land base treated with herbicides, insecticides, and fertilizer (reported separately by name of chemical) per year".)		Proposed language: "Research documentation to demonstrate that chemicals used are the least-toxic and narrowest-spectrum possible for management problem addressed through their use"	2	Additional language proposed prohibiting WHO 1A and 1B chemicals.	See proposed new Indicator 2.2.4 in draft standard.
PM 2.2 Indicators:					
1. Minimized chemical use required to achieve management objectives.					
Is chemical a synonym for herbicide? I assume fertilizers such as DAP or TSP are not considered a chemical.			2	Fertilizers are chemicals and subject to controlled application.	None
okay			3	General editorial comment.	None
The phrase "minimized chemical use" does not provide enough direction to effectively reduce the use of chemicals as there is no requirement to document the reduction.	Changes are needed to provide more direction regarding the reduction of chemical use.	Minimized chemical use to achieve management objectives as indicated by a gradual reduction in the quantity and concentration and/or toxicity of chemicals used. (wording should be inclusive of all chemicals used including fertilizers and pesticides).	2	Task group reviewed the comment but believes the current requirement at Performance Measure 2.2 does lead to minimized chemical use. The Task Group has proposed language prohibiting WHO 1A and 1B listed chemicals.	See proposed language for Indicator 2.2.4.
2. Use of least-toxic and narrowest- spectrum pesticides necessary to achieve management objectives.					
okay			3	General editorial comment.	None
3. Use of pesticides registered for the intended use and applied in accordance with label requirements.					
okay			3	General editorial comment.	None
4. Use of integrated pest management where feasible.					
okay			3	General editorial comment.	None
This indicator should be moved up in prominence and emphasized.			3	General editorial comment.	None
5. Supervision of forest chemical applications by state- or provincial- trained or certified applicators.					
okay			3	General editorial comment.	None

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6. Use of management practices appropriate to the situation, for example: 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 and other needed buffer strips; e. use of positive shutoff and minimal- drift spray valves; f. aerial application of forest chemicals 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; h. appropriate storage of chemicals; i. filing of required state or provincial reports; and/or j. use of methods to ensure protection of threatened and endangered species.					
Add "transport" to 2.2.6h example	There is nothing in the examples referencing transporting chemicals to job sites in a safe fashion	2.2.6h "appropriate storage and transport of chemicals to application sites"	2	Comments considered and new language proposed for Indicator 2.2.7.	See proposed revision to Indicator 2.2.7
Indicator 6g:	Wetlands should be added.	Monitoring of water quality or safeguards to ensure proper equipment use and protection of streams, lakes, wetlands and other water bodies	2	Comment considered but Task Grp believes that current language in Indicator 2.1.7 provides the necessary measures to safe-guard water quality when applying chemicals.	None
okay			3	General editorial comment.	None
Performance Measure 2.3. Program Participants shall implement forest management practices to protect and maintain forest and soil productivity.					
okay			3	General editorial comment.	None
The tree retention must reflect the species composition of the stand being harvested and the retention must represent no less than ten (10) percent of the stand volume.			2	Conversion from one forest type to another type addressed by proposed new Performance Measure 1.2. However, quantitative limits on retention must be decided at the individual stand basis. Cannot be set out in normative requirements.	None
There are currently no mandatory guidelines for rutting of soils under SFI	Rutting is occurring on harvests of timber being certified under SFI	Equipment rutting is considered excessive if the A & B horizons are mixed over 5% of the operations area	2	Task group considered comments but believes the issue of protecting forest and soil productivity is much more complex than defining rutting. Use state / provincial BMPs or their company guidelines to address rutting is considered to working well - rutting is not eliminated but is certainly reduced.	None

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We recommend that practices being implemented should be those that produce the best results and therefore either government or industry best management practices should be emphasized in this performance measure. For consistency this measure could be structured similar to performance measured for protecting water resources. The performance measure requires programs to be implemented but it should also require minimum elements for an effective program and require program participants to achieve minimum results. As an example the indicators currently listed could be considered minimum requirements of the program (we add some examples and a proposed structure). Finally we suggest that the guidance section could be strengthened by providing guidance for this performance measure.	See comment	Program Participants shall implement government and/or industry best management practices to protect and maintain forest and soil productivity.	2	This is the current requirement for SFI companies complying with Objectives 2 and 3.	None
PM 2.3 Indicators:					
1. Use of soils maps where available.					
Clarify that soils information is available and used.	Soil maps may not always exist. Need to rely on other information as available.	Use information on soils as appropriate to the situation.	2	Comments considered and new language proposed to address soil productivity.	See proposed revision to Performance Measure 2.3
okay			3	General editorial comment.	None
P. 26, PM 2.3, Indicator 1: "Use of soil maps" is not terribly specific, and could include a wide range of activities, from trivial to complex; including an action would therefore help this indicator have meaning.		Proposed language: "Demonstrated use of soil maps, where available, to delineate sensitive areas within a site that is to be managed"	2	Comments considered and new language proposed to address soil productivity.	See proposed revision to Performance Measure 2.3
2. Process to identify soils vulnerable to compaction, and use of appropriate methods to avoid excessive soil disturbance.					
Does not consider that soils can be disturbed during logging and then soil ripping and bedding may be prescribed.		Use appropriate methods to avoid and/or mitigate excessive soil disturbance as identified in state BMPs.	2	Task Group considered comments but believes that current requirements of Indicator 2.3.4; 2.3.6; & 2.3.7 address the issue.	None
Excellent.			3	General editorial comment.	None
okay			3	General editorial comment.	None
3. Use of erosion control measures to minimize the loss of soil and site productivity.					
okay			3	General editorial comment.	None
Suggest rewording.	Clarification.	Reword current indicator to "Use of management practices that protect against soil loss and maintain or enhance site productivity".	2	Suggested wording does not improve clarity.	None
4. Post-harvest conditions conducive to maintaining site productivity (e.g. limited rutting, retained down woody debris, minimized skid trails).					
okay			3	General editorial comment.	None

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Suggest rewording.	Clarification.	Reword current indicator as follows "Post-harvest conditions conducive to maintaining site productivity (e.g. limited rutting, retained down woody debris, appropriately sized and located skid trails)".	2	Suggested wording does not improve clarity.	None
5. Retention of vigorous trees during partial harvesting, consistent with scientific silvicultural standards for the area.					
okay			3	General editorial comment.	None
6. Criteria that address harvesting and site preparation to protect soil productivity.					
okay			3	General editorial comment.	None
7. Road construction and skidding layout to minimize impacts to soil productivity and water quality.					
okay			3	General editorial comment.	None
Suggest rewording.	Clarification, water quality is addressed in Objective 3.	"Use road construction and skid trail layout that reduces the potential for impacting soil productivity".	2	Comments considered and new language proposed for Indicator 2.3.7.	See proposed revision to Indicator 2.3.7
Performance Measure 2.4. Program Participants shall manage so as to protect forests from damaging agents, such as environmentally or economically undesirable wildfire, pests, diseases and invasive exotic plants and animals, to maintain and improve long-term forest health, productivity and economic viability.					
Clearcut sizes must be reduced to prevent susceptibility of large-scale insect infestations	Excessive clearcuts in SW Louisiana are exposing forests there to damaging agents and wildfire	Forests will be managed to increase diversity locally and regionally	2	Comment appears to be limited to one specific geography - no details provided in comment. Proposed language does not add clarity to current requirements.	None
consider adding an indicator under the Forest' Productivity' objective, Performance Measure 2.4, to address the prompt treatment of forest fuels. Conditions that represent high fire hazard.			2	Comments considered - task group believes that current requirements of Indicator 2.3.4 address fire control but has added proposed new language to address forest fuels included in Performance Measure 7.1.	See proposed revision to Indicator 7.1.1.
okay			3	General editorial comment.	None
PM 2.4 Indicators:					
1. Program to protect forests from damaging agents.					
Expand this to explicitly include a program to identify potential damaging agents for the region, including potential impacts of climate change.			2	Comment does not provide additional clarity to the current requirement.	None
okay			3	General editorial comment.	None
2. Management to promote healthy and productive forest conditions to minimize susceptibility to damaging agents.					
okay			3	General editorial comment.	None

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Suggest rewording.	Clarification.	"Management to promote healthy and productive forest conditions to increase resistance to damaging agents."	2	Comment does not provide additional clarity to the current requirement.	None
		No clearcuts over 120 acres in size without 300 ft. corridors or 3 year, 5 foot tall green up	2	Comment repeats the intent of Indicator 5.2.1 and 5.3.3. No rationale given for 300' buffer.	None
3. Participation in, and support of, fire and pest prevention and control programs.					
okay			3	General editorial comment.	None
should separate out fire and pest prevention	in certain parts of the country one issue may be more prevalent than another and may resonate more closely tie to a specific necessary activity for positive change.	2.4.3 Management to reduce the risk of wildfire. 2.4.4 Participation in and support of pest prevention programs.	2	Comment considered but task group believes that the current requirements of Performance Measure 2.4 adequately address the issue of fire and pest control.	None
Performance Measure 2.5. Program Participants that deploy improved planting stock, including varietal seedlings, shall use sound scientific methods.					
okay			3	General editorial comment.	None
The XXX will not support the use of genetic manipulation of trees or seed cultures for forest improvements or regeneration where the citizens have not been involved in the environmental risk assessment for the organism proposed.			4	Comment is confusing the concept of Mendelian genetics with genetic engineering.	None
SFI needs to directly address the potential use of trees derived through biotechnology in the revised standard.	Advances in biotechnology and the development of genetically modified trees continues, and it is highly likely that this technology will be commercially available within the timeframe covered by the 2015-2019 Standard.	Revise performance measure 2.5, including indicator 1, to reflect the likelihood that this technology will be commercially available in the future.	4	SFI has developed a policy addressing its position regarding genetically engineering fiber.	New GE policy pending SFI Board approval.
The phrase "improved planting stock" is too vague to be of use and focusing on varietal seedlings is not ecologically sound.			3	**SFI Section 13 - Definitions** has a widely accepted definition for "improved planting stock".	None
P. 26, PM 2.5: There is currently only one indicator, and it is concerned with "research, testing, evaluation and deployment" to ensure use of "sound scientific methods". Could add a new Indicator 2 to track the amount of improved stock actually out planted.		Proposed language: "Number of seedlings of improved planting stock and area planted as both total amount and as percentage of annual planting program, by stock type"	2	The SFI program periodically reviews and updates the data that is required for annual reporting by Certified Program Participants required in PM 20.2. New data collection requirements are considered carefully due to the cost of tracking and reporting. This suggestion may be considered at a later date when the reporting forms are under review.	None
PM 2.5 Indicator:					
1. Program for appropriate research, testing, evaluation and deployment of improved planting stock, including varietal seedlings.					

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Need to add clones and GMOs.		improved planting stock, clones, genetically modified trees, and varietals.	4	Comment is addressing genetically engineered planting stock the commercial deployment which is not within the scope of the SFI Standard. Additionally SFI has developed a new policy (pending SFI Board approval) addressing genetically engineered fiber.	New GE policy pending SFI Board approval.
okay			3	General editorial comment.	None
The SFI standard should restore the use of biotechnology essentially as it was in the 2005-2009 Standard.	The continued development and the commercial deployment of biotech trees is likely during the period covered by the 2015-2019 Standard. Failure to recognize and account for these innovations in the standard may put SFI at risk of irrelevancy.	Revise both the performance measure and indicators as follows: PM 2.5. Program participants that deploy improved planting stock, including trees derived through forest tree biotechnology and varietal seedlings, shall use scientific methods and follow all applicable laws and international protocols. Indicator 1. Program for appropriate research, testing, evaluation, and deployment of improved planting stock, including trees derived through biotechnology and varietal seedlings. Indicator 2. Participation in and support of programs to ensure the responsible use of trees derived through biotechnology.	4	SFI has developed a policy addressing its position regarding genetically engineering fiber.	New GE policy pending SFI Board approval.
Use this space to propose any removals or additions for Objective 2.					
Delete Indicator 2.1.1. It is unnecessary language since the reforestation requirement is already alluded to in 2.1.2.			3	Task Group believes that Indicator 2.1.1 is still relevant	None

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New Indicator to add to PM 2.1- Conversion of Forests with Exceptional Conservation Value shall not occur. New indicator to add to PM 2.2- Use of chemicals that are toxic, persistent, and bioaccumlative or that have been banned by international agreement is prohibited. Suggestions for PM 2.3 - In addition to the proposed new wording above. We recommend that restructuring the indicators as follows could strengthen the outcomes of the performance measure by outlining minimum requirements for programs related to forest and soil productivity. Indicators: 1.Program to identify activities that can impact forest and soil productivity and that implement government and/or industry best management practices during all phases of management activities. 2.Inventory, classification and mapping of sites vulnerable to soil compaction and rutting and/or nutrient loss as specified by legislation or in government or industry best management practices and, where appropriate, identification on the ground. 3.Avoidance of vulnerable sites whenever possible. 4.Program for forest and soil productivity maintenance and protection must include but not limited to the following best management practices that i.Avoid, reduce, or mitigate compaction ii.Avoid, reduce, or mitigate erosion iii.Avoid, reduce, or mitigate rutting and skid trails etc. iv.Avoid, reduce, or mitigate nutrient loss v.Avoid, reduce, or mitigate impacts of road construction on soil productivity, water quality, and water quantity. vi.Promote post-harvest conditions conducive to maintaining site productivity (e.g., retained down woody debris). vii.Retain vigorous trees during partial harvesting, consistent with scientific silvicultural standards for the area. viii.Address harvesting and site preparation to protect soil productivity. 5.Contract provisions that specify conformance to best management practices. 6.Where legislation or industry best management practices do not currently exist, use of experts to identify appropriate protection measures. 7.Monitoring of overall best management practices implementation to ensure programs are effectively protecting forest and soil productivity. Ineffective practices must be corrected or discontinued and government or industry sources of best management practices should be notified of issues. 8.Monitoring must include the setting, benchmarking and measuring of forest and soil productivity targets.			2	Task Group has reviewed these comments and believes that in all instances the current standard requirements of Objectives 1 and 2 satisfy the comments. With respect to comment about conversion of FECV there is proposed new language at Performance Measure 1.2 which captures the intent of an existing SFI interpretation which prohibits conversion of FECV.	See proposed language at PM 1.2.
Objective 3. Protection and Maintenance of Water Resources. To protect water quality in rivers, streams, lakes, and other water bodies.					
Restoration of degraded or impacted riparian and forest areas: The SFI standard lacks requirements around restoration or enhancement of riparian or forested areas that were impacted through previously poor riparian or forest management. Given the lack of prohibition on conversion in the SFI standard, there is significant concern about how much forest conversion and associated ecological impacts have occurred to date on SFI-certified forest lands that are now promoted as sustainably managed.	3.2.1, 4.1.1, 4.2.2 Expand indicators to require program and specific indicators for restoration or enhancement of degraded areas to improve riparian areas, promote biodiversity and improve stand structure.	3.2.1, 4.1.1, 4.2.2 Expand indicators to require program and specific indicators for restoration or enhancement of degraded areas to improve riparian areas, promote biodiversity and improve stand structure.	2	Task Group considered these comments. Proposed new language at Performance Measure 1.2 to address conversion of one forest type to another forest type along with new language at Performance Measure 3.2 to address increased protection of riparian areas and wetlands during all phases of management.	See proposed new language at PM 1.2 and PM 3.2.
Streamside Management Zones are not adequately protected under SFI	Over harvesting within SMZ's is causing thermal pollution and reducing water quality	Streamside Management Zones must maintain 50 square feet of basal area or 50% crown closure following harvesting	2	Task Group considered these comments. Proposed new language at Performance Measure 3.2 to address increased protection of riparian areas and wetlands during all phases of management.	See proposed new language at Performance Measure 3.2.

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There have been some changes in the regulation of navigable waters in Canada. I suggest that SFI include a requirement that bridges over water courses that are large enough for boating be high enough to allow clearance for boats likely to use the stream/river for recreation or transport.	Changes to Canadian regulation of Navigable Waters	Not too prescriptive but clear enough to achieve the practical objective of facilitating recreational use and wilderness transport in some cases.	3	General editorial comment but specifically addressed by Objective 15 - Legal Compliance.	None
We suggest this objective should be strengthened by emphasizing water quantity and ecological function in addition to its current emphasis on water quality. These parameters are also not addressed elsewhere in the standard. We also recommend that minimum required or suggested elements of a program must be incorporated to help ensure that any program that is implemented is also effective (i.e., the desired results are achieved) and that program participants must meet or exceed water quality laws where these apply (i.e., the indicators under PM3.1 focus only on best practices). We propose that carefully defining "wetlands" and other water resource terminology will assist in meeting the purpose of this objective and others. The objective focuses on management and "protection" but does not mention mitigation or restoration. For this reason we also suggest an additional performance measure under this objective. Best management practices can be used to achieve many desired management objectives (e.g., forest productivity and soils). However, the definition of best management practices used in the current standard focuses only on water quality protection and is focussed on BMPs developed only by governments (see definition recommendations). BMPs developed internally (company and/or industry led) and externally (NGOs and/or government led) should be incorporated to support program participants that are exceeding minimum requirements.	In forested watersheds, maintaining water quality and quantity within the natural range of variation for a particular region helps ensure ecological functions and ecological goods and services persist long term. Wetlands are key landscape features that protect water quality and quantity by capture sediments and pesticides and slowing runoff. Water body is also not defined thus it is not clear that open water wetlands are considered and only a definition for non-forested wetlands is referenced (we provide suggestions in the "Definitions" section). Ideally, all water resources including wetlands should be defined, identified and where possible mapped. Although careful management of water resources helps ensure restoration efforts are usually not necessary, in some cases (e.g., crossings) some disruption is inevitable. Where disturbance is necessary and temporary, restoration of wetland/aquatic ecological integrity is an essential requirement of program participants.	To protect the water quality and water quantity and maintain the ecological function of rivers, streams, lakes, wetlands, and other water bodies	2	Comments considered by the Task Group and proposed new language introduced for Performance Measures 3.1 and 3.2.	See proposed new language for PM 3.1 and 3.2.
While the ideal of protecting water quality is a sound one, the phrase itself is too vague to be of any practical use.	<--	To protect native biodiversity of rivers, streams, lakes, and other water bodies by reducing management impacts on temperature, dissolved oxygen, sediment, and stream flow.	2	Task Group considered comments and believes on balance that the current requirements of Objective 3 address the comment. Task Group has also proposed new definitions of **riparian areas** and **wetlands** the to further address water quality.	See proposed new definitions for riparian area and wetland in Section 13 - SFI Definitions.

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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 Canadian or U.S.					
	The SFI lacks performance measures for legal compliance, including in SFI certified forests, leaving certified operations' legality in question. While the Standard's core requirements for legal compliance in certified forests include a "system to achieve compliance with applicable federal, provincial, state, or local laws and regulations," and in the case of BMPs for water quality, "contract provisions that specify conformance…," there are no performance standards that trigger audits of whether actual practices in the forest are compliant with all applicable laws. At best, the Standard just requires auditors to look for "available regulatory action information. This approach will be inherently inadequate, given that regulators in many jurisdictions lack the resources to consistently assess compliance, and some agencies like the US Fish & Wildlife Service, which is the agency responsible for protecting threatened and endangered species, have virtually no enforcement capacity at all. As discussed below, the requirements for legal compliance for sourcing from non-certified forests are likely to be even less effective; these requirements tend to focus on only a couple of types of illegality out of many (timber theft from parks outside of North America and violations of BMPs within North America), and have virtually no requirements in terms of actual levels of compliance achieved in source forests. Relevant SFI provisions: Performance Measures 14.1 and 14.2 and their indicators; Performance Measure 3.1 and its indicators; Objectives 10 and 12 and their performance measures and indicators.		2	The comments provided are not accurate in describing SFI Standard requirements. SFI has existing requirements to address protection of water quality in Objective 3 and the Task Group has proposed enhancements to Performance Measures 3.1 amd 3.2. SFI Objective 15 - Legal and and Regulatory Compliance requires compliance with all applicable federal, provincial, state and local forestry and related social and environmental laws and regulations. The Task Group has proposed langauge addressing avoidance of illegally harvested wood from the United States and Canada. Finally, annual third-party audits verify that the requirements regarding legal compliance are being addressed by the program participant.	See proposed language for Indicators 3.1.1, 3.1.3, 3.2.1 and 3.2.3 and Performance Measure 15.1 and Indicators 15.1.4 and 15.1.5.

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see above (we also suggest some additional indicators in the "additions and removals" space below.	See above	Program Participants shall meet or exceed all applicable federal, provincial, state and local water quality and water quantity laws, and meet or exceed best management practices developed under Canadian or U.S. Environmental Protection Agency–approved water quality and/or water quantity programs.	2	The current requirements of Objective 3 are there to ensure that water quality best management practices are adhered to and where there is federal, state / provincial water quality legislation Objective 15 (Legal Compliance) requires compliance.	None
Employee training for culvert installation plays an important role to the success of the water crossing working as intended. Record keeping of training for this activity will ensure water quality is maintained and meets or exceeds all applicable laws. In Ontario where the jurisdiction for water flow management has been abandoned the LRC will be involved in stream crossing design to allow for navigable waters to be maintained and to prevent the perching of pipes that may prevent fish passage.			3	General comment. SFI land owners and land managers do support and or provide training which focuses on water quality BMPs as this is a requirement of Objective 17. Similar requirements are now proposed for inclusion in Objective 18 with a focus on landowner outreach.	See proposed new language in Indicators 17.2.1 and 18.1.1
PM 3.1 Indicators:					
1. Program to implement state or provincial best management practices during all phases of management activities.					
BMPs for water quality protection			3	General editorial comment.	None
		Program to identify potential impacts on water resources and to implement state or provincial best management practices during all phases of management activities.	2	Comment does not add clarity to existing requirement.	None
Performance Measure 3.2. Program Participants shall have or develop, implement and document riparian protection measures based on soil type, terrain, vegetation, ecological function, harvesting system and other applicable factors.					
Ce libellé pourrait laisser croire qu'il faut des mesures de protection en fonction de CHACUNE des variables suivantes: type de sol, le relief, la végétation, la fonction écologiqu, le système de récolte et les autres facteurs pertinents.	En prenant en compte les variables pouvant influencer les mesures de protection des bandes riveraines (ex.: type de sol, le relief, la végétation, la fonction écologique, le système de récolte).	none.	2	New definitions for wetlands and riparian areas have been developed along with a revised Performance Measure 3.2.	See proposed language for Performance Measure 3.2 and "wetlands" and "riparian areas" definitions
The statement must indicate that provincial guidelines must also be used (i.e.. Ontario Landscape guidelines) in the determination of what protection should be applicable.			3	Legal compliance is a requirement for all SFI companies - addressed in Objective 15	None

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	The SFI provides no performance measures to protect and restore water quality, aquatic habitats, and other watershed values in states or Provinces with weak or ineffective "best management practices" (BMPs). The Standard's provisions relating to water resources do not include any performance outcomes for water quality or other aquatic resources, nor do they provide any resource protections in the form of default stream buffer widths, prohibitions on roading and logging on steep or unstable slopes, restrictions on logging or roads when surface runoff is likely to enter streams, restrictions on logging or other management where it would increase stream temperatures or deliver sediments to waters that are on the EPA's list impaired waters under Clean Water Act section 303(d), etc. The Standard does require a "program" for management and protection of aquatic resources, and "use of experts to identify appropriate protection measures" where BMPs do not currently exist. However, no particular level of protection or restoration is required, both where BMPs do not exist, and where existing BMPs are known to be insufficient for the protection and restoration of water quality, stream flows, riparian habitats, fish and other aquatic species, and other values. Oregon's BMPs, for example, are well known as seriously deficient for these purposes, and have not been meaningfully updated to protect endangered salmon and other anadromous species or to meet clean water standards. Relevant SFI provisions: Objective 3 Protection and Maintenance of Water Resources, including Indicators 3.2.1 and 3.2.5; Performance Measure 2.3.		2	The comments provided are not accurate in describing SFI Standard requirements or the development and effectiveness of BMPs to protect water quality. State and provincial BMPs are required by the SFI Standard. These BMPs are developed at the state or provincial level using consensus based approaches. In the U.S., state BMP programs are evaluated and approved by the Environmental Protection agencies. BMPs have a long and proven track record in protecting water quality. State and provincial BMPs have very specific requirements on items mentioned by the commenter, including widths streamside management zones (buffers) and road building. The Task Group has revised language for the use of soils maps to identify soils vulnerable to compaction and use of appropriate methods to avoid excessive soil disturbance. Task Group has enhanced language for Performance Measure 3.2 for protection of water quality. Revised indicators are intended to give more emphasis to protection of wetlands and riparian areas. Likewise the Task Group has developed Performances Measure directed at conversion of forest types and conversion of forest land.	See proposed language for Indicator 2.3.1, and Performance Measure 3.2

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	Restoration of degraded or impacted riparian and forest areas: The SFI standard lacks requirements around restoration or enhancement of riparian or forested areas that were impacted through previously poor riparian or forest management. Given the lack of prohibition on conversion in the SFI standard, there is significant concern about how much forest conversion and associated ecological impacts have occurred to date on SFI-certified forest lands that are now promoted as sustainably managed. Current Language: 3.2. Program Participants shall have or develop, implement and document riparian protection measures based on soil type, terrain, vegetation, ecological function, harvesting system and other applicable factors. 4.1. Program Participants shall have programs to promote biological diversity at stand- and landscape-levels. 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.	Recommendation: 3.2.1, 4.1.1, 4.2.2 Expand indicators to require program and specific indicators for restoration or enhancement of degraded areas to improve riparian areas, promote biodiversity and improve stand structure.	2	Task Group has enhanced language for Performance Measure 3.2 for protection of water quality. Revised indicators are intended to give more emphasis to protection of wetlands and riparian areas. Likewise the Task Group has developed Performances Measure directed at conversion of forest types and conversion of forest land.	See proposed Performance Measures 1.2, 1.3, and 3.2.

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Some of our suggestions may appear redundant here as there is considerable overlap with Performance measure 3.1 and 3.2. Much of this overlap could be resolved with better definitions related to water resources.	In PM 3.2, the standard requires programs for addressing management and protection of riparian zones (indicator 1) but not for implementation of any plans (indicator 3). The standard also does not define what a riparian zone is. "Riparian zone" and "riparian area" are both used however there is no supporting definition to distinguish one from the other. We suggest an alternate definition of riparian be used and that definitions for riparian zones and riparian areas be added. However, with clear definition it may be possible to eliminate the use of either zone or area and use only one throughout.	no change	2	New definitions for riparian areas and wetlands have been proposed.	See proposed new definitions in Section 13 - SFI Definitions
PM 3.2 Indicators:					
1. Program addressing management and protection of rivers, streams, lakes, and other water bodies and riparian zones.					
Delete.	Unnecessary language. This Indicator primarily just regurgitates the verbiage in PM 3.2 and provides little value as an Indicator. It may be possible to combine Indicators 3.2.1, 3.2.2 and 3.2.3 for simplicity	Omit this Indicator	2	Task group believes that Indicator is still valid but has revised language.	See proposed revision for Indicator 3.2.1.
No comment			3	General editorial comment.	None
Objective 3, Performance Measure 3.2, Indicators 1 & 3 – The indicators should be for programs or plans to manage for and/or protect water quality in rivers, streams, lakes, etc. We don't have programs to manage the water bodies themselves. But we do have programs to manage the lands around the water bodies to protect water quality.			2	Task Group considered comments and believes on balance that the current requirements of Objective 3 address the comment. Task Group has proposed new language for Indicators 3.2.1, 3.2.2 and 3.2.3 as well as new definitions of **riparian areas** and **wetlands** the to further address water quality**.**	See proposed new language in Performance Measure 3.2.

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Restoration of degraded or impacted riparian and forest areas: The SFI standard lacks requirements around restoration or enhancement of riparian or forested areas that were impacted through previously poor riparian or forest management. Given the lack of prohibition on conversion in the SFI standard, there is significant concern about how much forest conversion and associated ecological impacts have occurred to date on SFI-certified forest lands that are now promoted as sustainably managed.	3.2.1, 4.1.1, 4.2.2 Expand indicators to require program and specific indicators for restoration or enhancement of degraded areas to improve riparian areas, promote biodiversity and improve stand structure.	3.2.1, 4.1.1, 4.2.2 Expand indicators to require program and specific indicators for restoration or enhancement of degraded areas to improve riparian areas, promote biodiversity and improve stand structure.	2	Task Group as considered these comments. Proposed new language at Performance Measure 1.2 to address conversion of one forest type to another forest type along with new language at Performance Measure 3.2 to address increased protection of riparian areas and wetlands during all phases of management.	See proposed new language at PM 1.2 and PM 3.2.
		1. Program addressing management and protection of rivers, streams, lakes, wetlands and other water bodies and riparian zones. 2. Inventory, classification and mapping of rivers, streams, lakes, wetlands and other water bodies as specified by legislation or in government or industry best management practices and, where appropriate, identification on the ground.	2	Comment addressed with proposed language for Performance Measure 3.2 and new definition for riparian area and wetlands.	None
2. Mapping of rivers, streams, lakes, and other water bodies as specified in state or provincial best management practices and, where appropriate, identification on the ground.					
No comment			3	General editorial comment.	None
3. Implementation of plans to manage or protect rivers, streams, lakes, and other water bodies.					
This indicator could be more specific to include measurements of water temperature, flow, suspended sediment, bed load, macro-invertebrate populations, etc..			2	The Task Group believes indicator needs to be fairly broad in nature to allow for the diversity in management and protection programs either through government regulations or company programs that are currently implemented to manage for potential effects to water quality and water quantity. Requirement to remain unchanged.	None

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		Implementation of plans to manage or protect rivers, streams, lakes, wetlands and other water bodies and riparian zones.	3	Currently a requirement of Objective 3 - comment does not add clarity to standard.	None
4. Identification and protection of non-forested wetlands, including bogs, fens and marshes, and vernal pools of ecological significance.					
		(may no longer be needed could be incorporated with indicator 3)	3	General editorial comment.	None
5. Where regulations or best management practices do not currently exist to protect riparian areas, use of experts to identify appropriate protection measures.					
Have seen this done many times by select literature review where protection measures are limited in scope and scale...always to the benefit of the logging company. Have not seen a comprehensive proposal showing full literature searches including zone of management, distances required, management options etc. which is much more work for companies.	Best management practices should be proposed upon a mixture of references and values. Economic value, Social value and Environmental value of an management practice should be proposed in clear writing to illustrate cost/benefits of solution. Experts should not include only industry selected experts but also ENGO and gov't experts for review.	Protection of riparian areas will be done on the greater of legislation or best management practices. Protection measures must be identified, if absent in legislation, through a spectrum of expert to provide a balanced review for identifying appropriate protection measures.	2	In the absence of federal/state or provincial water quality regulation best management practices are designed to address water quality as per the Clean Water Act and SFI companies must adhere to BMPs. Where water quality legislation does exist legal compliance is the minimum requirement for SFI companies.	None
Indicator should focus on using best available science and information, not experts.		...use of best available scientific information and research findings to implement appropriate protection measures.	2	Task Group has proposed new language for PM 3.2 as well as new definitions of **riparian areas** and **wetlands** the to further address water quality**.**	See proposed new language in Performance Measure 3.2.
		no change	3	General editorial comment.	None
Use this space to propose any removals or additions for Objective 3:					
Delete 3.2.1 as it provides little value as an Indicator, simply regurgitating the verbiage in PM 3.2. Perhaps combine Indicators 3.2.1, 3.2.2, and 3.2.3.			2	Task group believes that Indicator is still valid but has revised language.	See proposed revision for Indicator 3.2.1.

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PM 3.1 We suggest six new indicators. 1. Demonstration, through internal and/or external(i.e., government sources) records, compliance with all applicable federal, provincial, and state law. 2. Where state or provincial best management practice do not currently exist or are exceeded by industry best management practices, program to implement industry management practices 3. Implementation of a program for water quality protection that includes but is not limited to best management practices that avoid, reduce, or control: if. run off, particularly during wet-weather events ii. erosion and sedimentation, iii. nutrient influxes iv. chemical contamination v. temperature alterations 4. Program for water quantity protection that must include but not limited to best management practices that avoid, reduce, or mitigate: if) crossings ii) infillings iii) hydrologic flow alteration 5. Internal documentation that programs are effectively protecting water resources by achieving desired results. Correct or discontinue ineffective practices and notify government or industry sources of best management practices of issues. 6. Where legislation or industry best management practices do not currently exist, use of experts to identify appropriate protection measures. Based on the rationale and comments above for Objective 3, we also suggest adding an additional PM with 5 Indicators. Performance Measure 3.3 Where needed and when possible, program participants should restore the ecological integrity of water resources impacted by forestry operations. 1.Program to identify of rivers, streams, lakes, wetlands and other water bodies impacted by forestry operations. 2.Implementation of plans to restore the ecological integrity of rivers, streams, lakes, wetlands and other water bodies impacted by forestry activities 3.Use of government or industry best practices to guide restoration of water resources. 4.Where regulations or best management practices do not currently exist to restore water resources, use of experts to identify appropriate protection measures. 5.Internal documentation of program implementation to ensure water resources have been effectively restored. Practices known to be ineffective must be corrected or discontinued and government or industry sources of best management practices should be notified of issues.			2	Comment for 6 new indicators: #1 - Program participants (PP) already required to do this as per Objective 15 Legal Compliance; #2 - BMPs are required by all program participants on SFI certified lands. Legal requirements where they exist are the minimum BMP requirement. PP BMPs can exceeded this minimum if they choose to do so; #3 - i) proposed indicator addressed by existing requirements of 3.1 and 3.2; #3 ii) proposed indicator addressed to include requirement to erosion and sedimentation by existing requirements of 3.1 and 3.2; #3 iii) this proposed indicator for requirement to address nutrient influxes is already in PM 2.3; #3 iv) this proposed indicator for requirement to address chemical contamination is already in PM 2.2; #3 v) - this proposed indicator for requirement to address temperature alteration is already in PM 3.1 and 3.2. #4 - issue of water quantity protection and BMPs - group consensus that individual companies cannot control impacts to water quantity outside of what they are doing to address current PM 3.1, 3.2 and Objectives 4 and 5. However, this issues (water quantity has been flagged for future detailed discussion by a SFI task group. #5 - this proposed indicator is addressed in existing requirements at Objs 1, 2, 3 and 14. #6 - this proposed indicator is addressed in PM 3.1 and 3.2. Proposed new PM 3.3 - #1 - #5) restoration of ecological integrity of water resources impacted by forest operations - i) (identification of rivers, streams, and other water bodies; ii) restoration of ecological integrity of rivers, stream, and other water bodies; iii) use of govt or industry BMPs to guide restoration of ecological integrity; iv) use of experts to identify appropriate protection measures; v) Internal documentation of program implementation to ensure water resources have been effectively restored. These requirements are addressed in existing requirements at PM 3.1 and 3.2.	None
Objective 4. Conservation of Biological Diversity including Forests with Exceptional Conservation Value. 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 a diversity of types of habitat and successional stages, and conservation of forest plants and animals, including aquatic species.					

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Elements of this objective could be interpreted to conflict with the standard on prompt regeneration of forests following harvests.			2	Comment seems to imply that early seral stage succession is impacted by the requirement for prompt reforestation. Task Group disagrees with this comment.	None
Forest management and harvesting under SFI do not adequately protect CBD and FECV's		Efforts should be made to identify species listed as G1 and G2 under the Natural Heritage Program, and those species and communities must have protection measures recorded to prevent their loss	2	The existing definition of FECV addresses G1 and G2 species and ecological communities. The Task Group has proposed new language addressed at conservation of biological diversity in Performance Measure 4.1.	See proposed new language in PM 4.1.
Including globally vulnerable species and communities in FECV: Globally vulnerable species and communities (NatureServe G3) are at moderate risk of extinction or elimination and are not typically protected by state and provincial laws. Only if they're federally listed or state/provincially listed T&E species are they protected in some way, and many G3 species are not on state or federal lists of T&E species. No G3 communities are covered by current law. Current SFI language referencing programs to conserve stand and landscape-level biodiversity is not specific enough to get at this issue.	Expand definitions of FECV to include all globally vulnerable species and communities.	Expand definitions of FECV to include all globally vulnerable species and communities.	2	The Task Group believes that current data for Canada and US for occurrences of G3 species still need verification, therefore it is not feasible to add requirements to the SFI standard as the application of those requirements would be inconsistent (due to the data issues) and would not be auditable in many cases.	None

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	SFI continues to point to Forests of Exceptional Conservation Value (FECV) as their analogue to High Conservation Value Forests. However, the way FECV is currently defined within SFI, it is limited to critically imperiled and imperiled species and communities. (Note: How are imperiled species Forests of Exceptional Conservation Value? Many imperiled communities, too, are probably non-forested areas. This is a misnomer, and should be renamed, "Imperiled Species and Communities.") As such, FECV is a stand-level conservation concept at this point. Whatever term is used, the reality is that there are still no specific landscape, or coarse scale, biodiversity indicators in the SFI standard. As a result, it is very difficult to point to any tangible landscape scale conservation results as a result of SFI. Moreover, PEFC criterion PEFC ST 1003:2010 5.4.2 states that, "Forest management planning, inventory and mapping of forest resources shall identify, protect and/or conserve ecologically important forest areas containing significant concentrations of: a) protected, rare, sensitive or representative forest ecosystems such as riparian areas and wetland biotopes; b) areas containing endemic species and habitats of threatened species, as defined in recognised reference lists; c) endangered or protected genetic in situ resources; and taking into account d) globally, regionally and nationally significant large landscape areas with natural distribution	Recommendation: Adopt clear, auditable landscape-level biodiversity indicators that meet PEFC requirements.	2	SFI landscape biodiversity requirements meet the requirements of PEFC endorsement as demonstrated by the most 2011 re-endorsement of the SFI forest management requirements. With the aim of continually improving efforts to conserve biological diversity the Task Group has revised Performance Measures 4.1, 4.2 and 4.3.	See proposed language for Performance Measures 4.1, 4.2 and 4.3.

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	4.1.1: Program to promote the conservation of native biological diversity, including species, wildlife habitats and ecological community types. 4.1.5: Program for assessment, conducted either individually or collaboratively, of forest cover types, age or size classes, and habitats at the individual ownership level and, where credible data are available, across the landscape, and take into account findings in planning and management activities. SFI continues to point to Forests of Exceptional Conservation Value (FECV) as their analogue to the High Conservation Value (HCV) approach taken by some other certification systems. However, the way FECV is currently defined within SFI, it is limited to critically imperiled and imperiled species and communities. (Note: It is unclear how imperiled species can be considered Forests of Exceptional Conservation Value. Many imperiled communities, too, are probably non-forested areas. FECV is a misnomer, and should be renamed, "Imperiled Species and Communities.") As such, FECV is a stand-level conservation concept at this point. Whatever term is used, the reality is that there are still no specific landscape, or coarse-scale, biodiversity indicators in the SFI standard. As a result, it is very difficult to point to tangible landscape-scale conservation results as a result of SFI. Moreover, PEFC criterion PEFC ST 1003:2010 5.4.2 states that, "Forest management planning, inventory and mapping of forest resources shall identify, protect and/or conserve ecologically important forest	Recommendation: Adopt clear, auditable landscape-level biodiversity indicators that, at a minimum, meet PEFC requirements and, ideally, move towards the biodiversity-related elements of the HCVF definitions and approach.	2	SFI landscape biodiversity requirements meet the requirements of PEFC endorsement as demonstrated by the most 2011 re-endorsement of the SFI forest management requirements. With the aim of continually improving efforts to conserve biological diversity the Task Group has revised Performance Measures 4.1, 4.2 and 4.3.	See proposed language for Performance Measures 4.1, 4.2 and 4.3.

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	The SFI requires no protection for roadless wildlands, biodiversity hotspots, and many other endangered forests in North America, except in those limited cases where they are already protected by law. The Standard has no provisions requiring protection of roadless wildlands, biodiversity hotspots, and other endangered forests in North America, except for its limited measures for threatened and endangered species (which are discussed below). The SFI Standard's provisions for biodiversity hotspots are only applicable to sourcing from outside of North America, despite the presence of significant hotspots within North America. "Special sites" are also defined as "sites that include ecologically or geologically unique or culturally important features" meaning companies can choose to not include roadless areas, biodiversity hotspots, and other endangered forests. Relevant SFI provisions: Objective 4 Conservation of Biological Diversity, Objective 6 Protection of Special Sites, and Indicator 11.1.1.		2	Roadless wildlands are not an issue on lands owned or controlled by program participants. These are found on public lands and are mandated and managed by rule of law. Task Group has developed requirements for a new Objective the intent of which is to address biodiversity in fiber sourcing from non-certified lands.	See proposed language for Objective 9 and Performance Measure 9.1.

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	Restoration of degraded or impacted riparian and forest areas: The SFI standard lacks requirements around restoration or enhancement of riparian or forested areas that were impacted through previously poor riparian or forest management. Given the lack of prohibition on conversion in the SFI standard, there is significant concern about how much forest conversion and associated ecological impacts have occurred to date on SFI-certified forest lands that are now promoted as sustainably managed. Current Language: 3.2. Program Participants shall have or develop, implement and document riparian protection measures based on soil type, terrain, vegetation, ecological function, harvesting system and other applicable factors. 4.1. Program Participants shall have programs to promote biological diversity at stand- and landscape-levels. 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. Recommendation: 3.2.1, 4.1.1, 4.2.2 Expand indicators to require program and specific indicators for restoration or enhancement of degraded areas to improve riparian areas, promote biodiversity and improve stand structure.		2	Task Group has enhanced language for Performance Measure 3.2 for protection of water quality. Revised indicators are intended to give more emphasis to protection of wetlands and riparian areas. Likewise the Task Group has developed Performances Measure directed at conversion of forest types and conversion of forest land.	See proposed Performance Measures 1.2, 1.3, and 3.2.

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	The SFI has no requirement for companies to help restore habitats for threatened and endangered wildlife, to enable their recovery, or to restore biodiversity and habitats more generally. The SFI Standard contains no requirements for certified forests to be managed to improve habitat conditions for threatened and endangered species per se, to help enable the species' recovery. Nor does the Standard require improvements in biological diversity more generally, in cases where forests have been degraded by past management. While indicators do call for a "program to promote the conservation of native biological diversity, including species, wildlife habitats and ecological community types" and a "program for assessment… of forest cover types, age or size classes and habitats… and take into account findings in planning and management activities." However, no required performance outcomes are associated with these indicators – including habitat improvements over baseline conditions, which for many SFI certified forests include an absence of important habitat types and species' groups. Relevant SFI provisions: Indicators 4.1.1 and 4.1.5, Objective 4 Conservation of Biological Diversity, and Objective 6 Protection of Special Sites.		2	Task Group has enhanced language for Performance Measure 3.2 for protection of water quality. Revised indicators are intended to give more emphasis to protection of wetlands and riparian areas. Likewise the Task Group has developed Performances Measure directed at conversion of forest types and conversion of forest land.	See proposed Performance Measures 1.2, 1.3, and 3.2.

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	The SFI does not prohibit certified landowners from converting forests to tree plantations lacking biodiversity and other basic natural forest components. The SFI Standard contains no direct prohibitions or restrictions on the conversion of natural forests to plantations lacking various native tree species, age classes, structural diversity, wildlife habitat classes, etc. Theoretically, the biodiversity indicators calling for programs to promote conservation of native biological diversity…, retention of ”stand-level wildlife habitat elements such as snags…,” and programs for “assessment of forest cover types, age or size classes, and habitats…” could be interpreted to provide some indirect limitations on forest conversion. However, as discussed above, no performance outcomes are associated with these indicators, meaning that virtually any type of forest management can be found in compliance. Instead, the SFI has extensively certified plantations – including those established on former natural forest sites in recent years. Relevant SFI provisions: Indicators 4.1.1, 4.1.4, and 4.1.5.		2	The Task Group has adapted the existing SFI Interpretations regarding: 1) conversion to non-forest land use and 2) conversion of one forest type to another forest type.	See proposed language at Performance Measure 1.2 and 1.3.

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	The SFI does not require companies to restore portions of existing plantations to more natural conditions. The SFI Standard contains no direct requirements for portions of existing plantations to be managed for natural forest structure and composition – in other words, to begin restoring highly degraded forests while continuing to provide forest resources. As discussed above, SFI has biodiversity indicators which theoretically could provide some indirect expectations for plantation restoration; however, these indicators have no performance expectations, nor is it apparent they are being interpreted in a manner that is improving conditions in widespread ecologically barren tree plantations that are SFI certified. Relevant SFI provisions: Indicators 4.1.1, 4.1.4, and 4.1.5.		2	Task Group has enhanced language for Performance Measure 3.2 for protection of water quality. Revised indicators are intended to give more emphasis to protection of wetlands and riparian areas. Likewise the Task Group has developed Performances Measure directed at conversion of forest types and conversion of forest land.	See proposed Performance Measures 1.2, 1.3, and 3.2.

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	The SFI does not prohibit certified landowners from converting their forests to non-forest conditions, including subdivisions and other non-forest land uses. The SFI Standard contains no provisions prohibiting certified companies from converting forestlands to subdivisions, intensive recreation, surface mines, or other non-forest land uses, thereby reducing the natural resource land base and impacting forest landscapes, habitats, and biodiversity. Such conversion is arguably the most unsustainable thing that can happen to a forest, even from a narrow timber production perspective. While SFI has indicators that call for reforestation, and programs to conserve native biological diversity and management for other forest values could theoretically provide some indirect protection against such conversion, many of the SFI's indicators embody no particular performance expectations. There is no evidence that the indicators are being interpreted to restrict conversion. Instead, a number of prominent SFI certified companies have active land sales and development programs. Relevant SFI provisions: Various, including Indicators 2.1.2 and 4.1.1.		2	The Task Group has adapted the existing SFI Interpretations regarding: 1) conversion to non-forest land use and 2) conversion of one forest type to another forest type.	See proposed language at Performance Measure 1.2 and 1.3.

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	The SFI lacks performance standards for natural forest characteristics, including those needed for wildlife and ecosystem processes. For example, there is no clear requirement to maintain a natural diversity of tree species and tree age classes. While the SFI Standard pays lip service to forest diversity and composition, it contains no performance standards that would require SFI certified forests to be managed for relatively natural conditions, even in the context of what is feasible for commercial forest management. As noted above, there are several indicators that call for "programs[s] to promote the conservation of native biological diversity, including species, wildlife habitats and ecological community types," retention of "stand-level wildlife habitat elements…," and "program[s] for assessment… of forest cover types, age or size classes, and habitats…." However, none of these indicators require any particular outcomes in terms of conditions in the forest, and the SFI routinely certifies plantations and other industrial tree farms that are greatly lacking in natural forest attributes. Relevant SFI provisions: Indicators 4.1.1, 4.1.4, and 4.1.5.		2	The comments do not accurately describe the SFI Standard requirements or the outcomes achieved with them. No specific changes to the Standard are provided. Objective 4 has several performance measures and indicators requiring program participants to manage biodiversity at the stand and landscape levels including the conservation of native biological diversity. The Task Group has however developed enhanced language for Performance Measures 4.1, 4.2 and 4.3,	See proposed language for Performance Measures 4.1, 4.3 and 4.3.

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The SFI does not clearly protect many threatened and endangered species, and requires no protection for most of the large number of imperiled species that are not yet officially recognized as threatened or endangered. The SFI Standard's provision that most directly speaks to protection of threatened and endangered species merely requires landowners to have a "program to protect threatened and endangered species." As discussed above, no specific outcomes or protection levels are required of these programs, and not surprisingly, SFI auditors have approved timber company "habitat conservation plans" that allow the elimination of large amounts of threatened and endangered terrestrial species' habitats and populations, have certified timber companies that were harming threatened terrestrial species without federal "habitat conservation plan" permits, and have also certified timber companies in states where existing BMPs are well documented as insufficient for the protection of threatened and endangered salmon and other anadromous fish, e.g., Oregon. The Standard also requires a "program to locate and protect known sites associated with viable occurrences of critically imperiled and imperiled species and communities." However, many threatened and endangered species are not listed as "critically imperiled" or "imperiled" per se; prominent examples include grizzly bear, Louisiana black bear, gray wolf, Canada lynx, woodland caribou, Carolina Northern flying squirrel, peregrine falcon, Northern spotted owl, red cockaded woodpecker, Lahontan cutthroat trout, coho salmon, sockeye salmon, bull trout, and California red legged frog. Similarly, protection is only afforded to "known occurrences," and the relevant databases tend to lack information on threatened and endangered species' occurrences on timber company lands. Likewise, protection should also not be limited to "viable" occurrences, since by definition, threatened and endangered species (and their occurrences) are at serious risk of not being viable. Equally important, many species that are de facto threatened and endangered are not officially listed as such, and the SFI Standard provides no recognition and protection to such species, unless they happen to be listed as "critically imperiled" or "imperiled," which is unlikely. Relevant SFI provisions: Indicators 4.1.2 and 4.1.3, and Guidance to SFI 2010-2014 Standard.			2	The comments do not accurately describe the SFI Standard requirements or the outcomes achieved with them. Threatened and endangered species are protected by laws and regulations and SFI program requirements. Habitat Conservation Plans are approved by federal agencies, not SFI auditors. Imperiled and critically imperiled species (that many not be protected by laws) are also protected by SFI program requirements in Objective 4. It is not practical to attempt to include requirements to protect species that "may become threatened or endangered" that have not been identified and listed by a credible, science-based, transparent process and organization. The Task Group has however developed enhanced language for Performance Measures 4.1, 4.2 and 4.3,	See proposed language for Performance Measures 4.1, .42. and 4.3.

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	The SFI's standards are being interpreted to allow forestry companies to eliminate the last threatened and endangered species' populations and habitats on their properties. The SFI certifies timber companies in the US that are logging, degrading, and destroying much of the last habitat for threatened and endangered species in the certified forests, despite standards language that ostensibly calls for "program[s] to protect threatened and endangered species." In some cases, the logging is legally permitted via Endangered Species Act exemptions that are known euphemistically as "habitat conservation plans," and that allow the removal of substantial numbers and amounts of threatened and endangered species' populations and habitats. While legal, such logging contradicts the apparent intent of the SFI Standard. Relevant SFI provisions: SFI Standard, Indicators 4.1.2 and 4.1.3; Guidance to SFI 2010-2014 Standard.		2	The comments do not accurately describe the SFI Standard requirements or the outcomes achieved with them. Threatened and endangered species are protected by laws and regulations and SFI program requirements. Habitat Conservation Plans are approved by federal agencies, not SFI auditors. Imperiled and critically imperiled species (that many not be protected by laws) are also protected by SFI program requirements in Objective 4. It is not practical to attempt to include requirements to protect species that "may become threatened or endangered" that have not been identified and listed by a credible, science-based, transparent process and organization. The Task Group has however developed enhanced language for Performance Measures 4.1, 4.2 and 4.3,	See proposed language for Performance Measures 4.1, .42. and 4.3.

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	Including globally vulnerable species and communities in FECV: Globally vulnerable species and communities (NatureServe G3) are at moderate risk of extinction or elimination and are not typically protected by state and provincial laws. Only if they're federally listed or state/provincially listed T&E species are they protected in some way, and many G3 species are not on state or federal lists of T&E species. No G3 communities are covered by current law. Current SFI language referencing programs to conserve stand and landscape-level biodiversity is not specific enough to get at this issue. Current Language: 4.1.3. Program to locate and protect known sites associated with viable occurrences of critically imperiled and imperiled species and communities also known as Forests with Exceptional Conservation Value. Recommendation: Expand definitions of FECV to include all globally vulnerable species and communities.		2	The Task Group believes that current data for Canada and US for occurrences of G3 species still need verification, therefore it is not feasible to add requirements to the SFI standard as the application of those requirements would be inconsistent (due to the data issues) and would not be auditable in many cases.	None

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	Including globally vulnerable species and communities in FECV: Globally vulnerable species and communities (NatureServe G3) are at moderate risk of extinction or elimination and are not typically protected by state and provincial laws. Only if they're federally listed or state/provincially listed T&E species are they protected in some way, and many G3 species are not on state or federal lists of T&E species. No G3 communities are covered by current law. Current SFI language referencing programs to conserve stand and landscape-level biodiversity is not specific enough to get at this issue. Current Language: 4.1.3. Program to locate and protect known sites associated with viable occurrences of critically imperiled and imperiled species and communities also known as Forests with Exceptional Conservation Value.	Recommendation: Expand definitions of FECV to include all globally vulnerable species and communities.	2	The Task Group believes that current data for Canada and US for occurrences of G3 species still need verification, therefore it is not feasible to add requirements to the SFI standard as the application of those requirements would be inconsistent (due to the data issues) and would not be auditable in many cases.	None

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The SFI does not clearly protect many threatened and endangered species, and requires no protection for most of the large number of imperiled species that are not yet officially recognized as threatened or endangered. The SFI Standard's provision that most directly speaks to protection of threatened and endangered species merely requires landowners to have a "program to protect threatened and endangered species." As discussed above, no specific outcomes or protection levels are required of these programs, and not surprisingly, SFI auditors have approved timber company "habitat conservation plans" that allow the elimination of large amounts of threatened and endangered terrestrial species' habitats and populations, have certified timber companies that were harming threatened terrestrial species without federal "habitat conservation plan" permits, and have also certified timber companies in states where existing BMPs are well documented as insufficient for the protection of threatened and endangered salmon and other anadromous fish, e.g., Oregon. The Standard also requires a "program to locate and protect known sites associated with viable occurrences of critically imperiled and imperiled species and communities." However, many threatened and endangered species are not listed as "critically imperiled" or "imperiled" per se; prominent examples include grizzly bear, Louisiana black bear, gray wolf, Canada lynx, woodland caribou, Carolina Northern flying squirrel, peregrine falcon, Northern spotted owl, red cockaded woodpecker, Lahontan cutthroat trout, coho salmon, sockeye salmon, bull trout, and California red legged frog. Similarly, protection is only afforded to "known occurrences," and the relevant databases tend to lack information on threatened and endangered species' occurrences on timber company lands. Likewise, protection should also not be limited to "viable" occurrences, since by definition, threatened and endangered species (and their occurrences) are at serious risk of not being viable. Equally important, many species that are de facto threatened and endangered are not officially listed as such, and the SFI Standard provides no recognition and protection to such species, unless they happen to be listed as "critically imperiled" or "imperiled," which is unlikely. Relevant SFI provisions: Indicators 4.1.2 and 4.1.3, and Guidance to SFI 2010-2014 Standard.			2	The comments do not accurately describe the SFI Standard requirements or the outcomes achieved with them. Threatened and endangered species are protected by laws and regulations and SFI program requirements. Habitat Conservation Plans are approved by federal agencies, not SFI auditors. Imperiled and critically imperiled species (that many not be protected by laws) are also protected by SFI program requirements in Objective 4. It is not practical to attempt to include requirements to protect species that "may become threatened or endangered" that have not been identified and listed by a credible, science-based, transparent process and organization. The Task Group has however, developed revised language for Performance Measures 4.1, 4.2 and 4.3.	See proposed language for Performance Measures 4.1, 4.2 and 4.3.

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	The SFI does not prohibit certified landowners from converting forests to tree plantations lacking biodiversity and other basic natural forest components. The SFI Standard contains no direct prohibitions or restrictions on the conversion of natural forests to plantations lacking various native tree species, age classes, structural diversity, wildlife habitat classes, etc. Theoretically, the biodiversity indicators calling for programs to promote conservation of native biological diversity…, retention of ”stand-level wildlife habitat elements such as snags…,” and programs for “assessment of forest cover types, age or size classes, and habitats…” could be interpreted to provide some indirect limitations on forest conversion. However, as discussed above, no performance outcomes are associated with these indicators, meaning that virtually any type of forest management can be found in compliance. Instead, the SFI has extensively certified plantations – including those established on former natural forest sites in recent years.		2	The Task Group has adapted the existing SFI Interpretations regarding: 1) conversion to non-forest land use and 2) conversion of one forest type to another forest type.	See proposed language at Performance Measure 1.2 and 1.3.

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	Old Growth: This requirement has little or nothing to do with how old-growth is treated on SFI certified lands. At this point, there is very little old growth left in the lower 48. It is difficult to understand why SFI does not require the last remaining old-growth to be identified and protected on certified lands. Current Language: 4.1.6: Support of and participation in plans or programs for the conservation of old-growth forests in the region of ownership.	Recommendation: Adopt clear prohibitions on harvesting old-growth in the lower 48.	2	The SFI Standard requires program participants to identify and protect ecologically significant forests, including old-growth forests and Forests with Exceptional Conservation Value. Program participants are also required to protect threatened and endangered species, promote the conservation of native biological diversity, including species, wildlife habitats and ecological or natural community types at stand and landscape levels, and promote the conservation of biodiversity hotspots and high-biodiversity wilderness areas as defined by Conservation International. Task Groups believes current language and proposed revisions to Performance Measures 4.1, 4.2 and 4.3 address forest management approaches to conservation of old-growth forests in the region of ownership.	See proposed language for Performance Measures 4.1, 4.2, and 4.3.

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The SFI requires virtually no protection for old growth trees and stands, including in the forests being certified. The closest the SFI Standard comes to requiring the protection of old growth in the US and other countries where it is now rare is an indicator requiring "support of and participation in plans or programs for the conservation of old-growth forests in the region of ownership." It is very unlikely that plans and programs exist in most regions in the US requiring the protection of all remaining old growth, and even if such plans were to exist, almost any action could count as "support and participation." Most importantly, the Standard does not require protection of old growth in the forests being certified. Thus it is not surprising that a number of companies in the US have logged now-rare old-growth while being SFI certified under this provision. Relevant SFI provisions: Indicator 4.1.6.	The SFI requires virtually no protection for old growth trees and stands, including in the forests being certified. The closest the SFI Standard comes to requiring the protection of old growth in the US and other countries where it is now rare is an indicator requiring "support of and participation in plans or programs for the conservation of old-growth forests in the region of ownership." It is very unlikely that plans and programs exist in most regions in the US requiring the protection of all remaining old growth, and even if such plans were to exist, almost any action could count as "support and participation." Most importantly, the Standard does not require protection of old growth in the forests being certified. Thus it is not surprising that a number of companies in the US have logged now-rare old-growth while being SFI certified under this provision. Relevant SFI provisions: Indicator 4.1.6.		2	The SFI Standard requires program participants to identify and protect ecologically significant forests, including old-growth forests and Forests with Exceptional Conservation Value. Program participants are also required to protect threatened and endangered species, promote the conservation of native biological diversity, including species, wildlife habitats and ecological or natural community types at stand and landscape levels, and promote the conservation of biodiversity hotspots and high-biodiversity wilderness areas as defined by Conservation International.	See proposed language for Performance Measures 4.1, 4.2, and 4.3.
The standard requires programs to promote biological diversity at stand- and landscape-level but this language could be changed to ensure the conservation (protection and maintenance) of biological diversity. Government or industry best management practices to maintain biodiversity (which ever produce the best results) should be used wherever they exist. The Standard should also provide guidance or outline requirements regarding methods for measuring and monitoring biodiversity indicators to ensure programs are achieving desired results.	We think there is a meaningful distinction between promoting biological diversity and conserving biodiversity. Accountability for ensuring the conservation biological diversity is an important component of sustainability. We have attempted to incorporate existing indicators and some new indicators into elements that can be measured and documented such that efficacy of these programs can be verified.		2	General comment - detailed response to be provided below.	None
Performance Measure 4.1. Program Participants shall have programs to promote biological diversity at stand and landscape levels.					

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Landscape levels not possible in most instances.	Cannot effect landscape level promotion with limited acreage available in most ownerships.	Remove 'and landscape'.	2	Task group disagrees with proposed change. Proposed new language for indicators 4.1.1 and 4.1.3 address conservation of biological diversity at the landscape level.	See proposed new language for Indicators 4.1.1, 4.1.3 and 4.2.2.
Exceptional conservation value must include the Aboriginal component that identifies land use. Managing exceptional conservation value area cannot be done through a blanket/generic policy; these areas require individual model planning and are site specific.			1	Task group agrees - requirements of Indicator 4.1.4 revised to consider Indigenous peoples values in conservation planning and priority setting efforts.	See proposed new language for Indicator 4.1.4.

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Landscape-level biodiversity indicators: SFI continues to point to Forests of Exceptional Conservation Value (FECV) as their analogue to High Conservation Value Forests. However, the way FECV is currently defined within SFI, it is limited to critically imperiled and imperiled species and communities. (Note: How are imperiled species Forests of Exceptional Conservation Value? Many imperiled communities, too, are probably non-forested areas. This is a misnomer, and should be renamed, "Imperiled Species and Communities.") As such, FECV is a stand-level conservation concept at this point. Whatever term is used, the reality is that there are still no specific landscape, or coarse-scale, biodiversity indicators in the SFI standard. As a result, it is very difficult to point to any tangible landscape-scale conservation results as a result of SFI. Moreover, PEFC criterion PEFC ST 1003:2010 5.4.2 states that, "Forest management planning, inventory and mapping of forest resources shall identify, protect and/or conserve ecologically important forest areas containing significant concentrations of: a)protected, rare, sensitive or representative forest ecosystems such as riparian areas and wetland biotopes; b)areas containing endemic species and habitats of threatened species, as defined in recognised reference lists; c)endangered or protected genetic in situ resources; and taking into account d)globally, regionally and nationally significant large landscape areas with natural distribution and abundance of naturally occurring species." Restoration of degraded or impacted riparian and forest areas: The SFI standard lacks requirements around restoration or enhancement of riparian or forested areas that were impacted through previously poor riparian or forest management. Given the lack of prohibition on conversion in the SFI standard, there is significant concern about how much forest conversion and associated ecological impacts have occurred to date on SFI-certified forest lands that are now promoted as sustainably managed.	Adopt clear, auditable landscape-level biodiversity indicators that meet PEFC requirements.		2	The Task Group does not believe that renaming or redefining FECV is of value. There are however revisions proposed for Performance Measures that address landscape level biodiversity. Regarding inclusion of G3 species and ecological communities the task group believes that current data for Canada and US for occurrences of G3 species still need verification, therefore it is not feasible to add requirements to the SFI standard as the application of those requirements would be inconsistent (due to the data issues) and would not be auditable in many cases. Regarding the comment regarding conversion the Task GRoup has proposed language addressing conversion of one forest type to another and conversion of forestland to non-forestland.	See proposed new language fo Performance Measures 1.2 and 1.3; Indicators 4.1.1 and 4.1.3 and Performance Measure 4.3.
Need two Performance Measures. One for stand level and another for landscape levels. Add promote and conserve		..to promote and conserve biological diversity...	2	Task group agrees with the intent of the comment. Proposed new language for Performance Measure 4.1 addresses biodiversity at both the stand and landscape level.	See proposed revisions to PM 4.1.

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We think there is a meaningful distinction between promoting biological diversity and conserving biodiversity.	Accountability for ensuring the conservation biological diversity is an important component of sustainability.	Program Participants shall implement programs to conserve biological diversity at stand and landscape-levels.	2	Revised language for Performance Measure 4.1 addresses this comment.	See proposed revisions to PM 4.1.
1. Program to promote the conservation of native biological diversity, including species, wildlife habitats and ecological community types.					
Landscape-level biodiversity indicators: SFI continues to point to Forests of Exceptional Conservation Value (FECV) as their analogue to High Conservation Value Forests. However, the way FECV is currently defined within SFI, it is limited to critically imperiled and imperiled species and communities. (Note: How are imperiled species Forests of Exceptional Conservation Value? Many imperiled communities, too, are probably non-forested areas. This is a misnomer, and should be renamed, "Imperiled Species and Communities.") As such, FECV is a stand-level conservation concept at this point. Whatever term is used, the reality is that there are still no specific landscape, or coarse-scale, biodiversity indicators in the SFI standard. As a result, it is very difficult to point to any tangible landscape-scale conservation results as a result of SFI. Moreover, PEFC criterion PEFC ST 1003:2010 5.4.2 states that, "Forest management planning, inventory and mapping of forest resources shall identify, protect and/or conserve ecologically important forest areas containing significant concentrations of: a) protected, rare, sensitive or representative forest ecosystems such as riparian areas and wetland biotopes; b) areas containing endemic species and habitats of threatened species, as defined in recognised reference lists; c) endangered or protected genetic in situ resources; and taking into account d) globally, regionally and nationally significant large landscape areas with natural distribution and abundance of naturally occurring species." Restoration of degraded or impacted riparian and forest areas: The SFI standard lacks requirements around restoration or enhancement of riparian or forested areas that were impacted through previously poor riparian or forest management. Given the lack of prohibition on conversion in the SFI standard, there is significant concern about how much forest conversion and associated ecological impacts have occurred to date on SFI-certified forest lands that are now promoted as sustainably managed.	Adopt clear, auditable landscape-level biodiversity indicators that meet PEFC requirements. 3.2.1, 4.1.1, 4.2.2 Expand indicators to require program and specific indicators for restoration or enhancement of degraded areas to improve riparian areas, promote biodiversity and improve stand structure.	Adopt clear, auditable landscape-level biodiversity indicators that meet PEFC requirements. 3.2.1, 4.1.1, 4.2.2 Expand indicators to require program and specific indicators for restoration or enhancement of degraded areas to improve riparian areas, promote biodiversity and improve stand structure.	2	The Task Group does not believe that renaming or redefining FECV is of value. There are however revisions proposed for Performance Measures that address landscape level biodiversity. Regarding inclusion of G3 species and ecological communities the task group believes that current data for Canada and US for occurrences of G3 species still need verification, therefore it is not feasible to add requirements to the SFI standard as the application of those requirements would be inconsistent (due to the data issues) and would not be auditable in many cases. Regarding the comment regarding conversion the Task GRoup has proposed language addressing conversion of one forest type to another and conversion of forestland to non-forestland.	See proposed new language for Performance Measures 1.2 and 1.3; Indicators 4.1.1, 4.1.3, 4.2.2 and Performance Measure 4.3.
as Forests with Exceptional Conservation Value. Plans for protection may be developed independently or collaboratively, and may include Program					

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Including globally vulnerable species and communities in FECV: Globally vulnerable species and communities (NatureServe G3) are at moderate risk of extinction or elimination and are not typically protected by state and provincial laws. Only if they're federally listed or state/provincially listed T&E species are they protected in some way, and many G3 species are not on state or federal lists of T&E species. No G3 communities are covered by current law. Current SFI language referencing programs to conserve stand and landscape-level biodiversity is not specific enough to get at this issue.	Expand definitions of FECV to include all globally vulnerable species and communities.	Expand definitions of FECV to include all globally vulnerable species and communities.	2	The Task Group believes that current data for Canada and US for occurrences of G3 species still need verification, therefore it is not feasible to add requirements to the SFI standard as the application of those requirements would be inconsistent (due to the data issues) and would not be auditable in many cases.	None
This indicator needs to maintain no expectation for survey prior to management, as stated in the SFI Interpretations Document. We recommend that the future standard stay with G1/G2 ranks to require protection. Avoid consideration of S1/S2 ranks. Such state-level consideration is problematic since states on the edge of species' or communities' ranges may assign high conservation rankings for individuals or habitats that otherwise are abundant and not imperiled in the rest of their ranges.		No proposed change	2	Task group agrees with comment. However, these are proposed revisions to PM 4.1 that require program Participants to be knowledgeable about state/provincial level conservation planning and priority setting efforts to conserve biological diversity including state wildlife action plans, state forest action plans, relevant habitat conservation plans or provincial wildlife recovery action plans.	See proposed new language for Performance Measure 4.1.
4. Development and implementation of criteria, as guided by regionally appropriate best scientific information, to retain stand-level wildlife habitat elements such as snags, stumps, mast trees, down woody debris, den trees and nest trees.					
criteria can be qualitative and quantitative.		implementation of qualitative and/or quantitative criteria...	2	Task group review the comment and believes that new requirements in Performance Measure 4.1 addresses comment.	Comment addressed in new Indicator 4.1.2. Indicator requires use of regionally based best scientific information.
5. Program for assessment, conducted either individually or collaboratively, of forest cover types, age or size classes, and habitats at the individual ownership level and, where credible data are available, across the landscape, and take into account findings in planning and management activities.					

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Landscape-level biodiversity indicators: SFI continues to point to Forests of Exceptional Conservation Value (FECV) as their analogue to High Conservation Value Forests. However, the way FECV is currently defined within SFI, it is limited to critically imperiled and imperiled species and communities. (Note: How are imperiled species Forests of Exceptional Conservation Value? Many imperiled communities, too, are probably non-forested areas. This is a misnomer, and should be renamed, "Imperiled Species and Communities.") As such, FECV is a stand-level conservation concept at this point. Whatever term is used, the reality is that there are still no specific landscape, or coarse-scale, biodiversity indicators in the SFI standard. As a result, it is very difficult to point to any tangible landscape-scale conservation results as a result of SFI. Moreover, PEFC criterion PEFC ST 1003:2010 5.4.2 states that, "Forest management planning, inventory and mapping of forest resources shall identify, protect and/or conserve ecologically important forest areas containing significant concentrations of: a) protected, rare, sensitive or representative forest ecosystems such as riparian areas and wetland biotopes; b) areas containing endemic species and habitats of threatened species, as defined in recognised reference lists; c) endangered or protected genetic in situ resources; and taking into account d) globally, regionally and nationally significant large landscape areas with natural distribution and abundance of naturally occurring species."	Adopt clear, auditable landscape-level biodiversity indicators that meet PEFC requirements.	Adopt clear, auditable landscape-level biodiversity indicators that meet PEFC requirements.	2	The Task Group does not believe that renaming or redefining FECV is of value. There are however revisions proposed for Performance Measures that address landscape level biodiversity. Regarding inclusion of G3 species and ecological communities the task group believes that current data for Canada and US for occurrences of G3 species still need verification, therefore it is not feasible to add requirements to the SFI standard as the application of those requirements would be inconsistent (due to the data issues) and would not be auditable in many cases.	See proposed new language for Indicators 4.1.1 and 4.1.3, 4.2.2 and Performance Measure 4.3.
Need to identify the objective of this Indicator. Is this focused on rare, underrepresented, or state identified cover types in need of restoration.		...and habitats that are rare, underrepresented at the individual ownership...	2	Task group believe proposed new requirements addresses comment.	See proposed new language for Indicators 4.1.4, 4.2.1, 4.2.2 and Performance Measure 4.4.1.

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This indicator could use some discussion and clarification on what the expectation really is, especially if there is any plan to strengthen it. We need to be clear about the role of managed forests in conservation of biological diversity at the landscape and regional scales.	It will be important to maintain some type of flexibility as stated in the final phrase, "where practical and when consistent with management objectives".	4.1.5 – Program for assessment, conducted individually or collaboratively, of forest cover types, age or size classes, and habitats at the individual ownership level and, where credible data are available, across the landscape, and take into account findings in planning and management activities, where practical and when consistent with management objectives	2	Task group believe proposed new requirements addresses comment.	See proposed new language for Indicators 4.1.4, 4.2.1, 4.2.2 and Performance Measure 4.4.1.
		Remove 'landscape' requirement.	2	Task group believes that Indicator is still valid but has revised language for this Performance Measure.	See proposed new language for Indicators 4.1.4, 4.2.1, 4.2.2 and Performance Measure 4.4.1.
Old Growth: This requirement has little or nothing to do with how old-growth is treated on SFI certified lands. At this point, there is very little old growth left in the lower 48. It is difficult to understand why SFI does not require the last remaining old-growth to be identified and protected on certified lands.	Adopt clear prohibitions on harvesting old-growth in the lower 48.	Adopt clear prohibitions on harvesting old-growth in the lower 48.	2	The SFI Standard requires program participants to identify and protect ecologically significant forests, including old-growth forests and Forests with Exceptional Conservation Value. Program participants are also required to protect threatened and endangered species, promote the conservation of native biological diversity, including species, wildlife habitats and ecological or natural community types at stand and landscape levels, and promote the conservation of biodiversity hotspots and high-biodiversity wilderness areas as defined by Conservation International.	
Most of the State and federal timberlands in Alaska are in an old-growth (over mature) stage. We need to harvest sufficient old-growth timberlands to establish healthy young growth stands that will sustain our timber industry and our local communities. There are already plenty of old-growth timberlands locked up In wilderness, parks, stream buffers and other reserves in Alaska. In addition, there are relatively few forests in Alaska that are in an early successional stage, so harvesting and reforesting some of Alaska's old-growth timber will increase biodiversity.	No change is required as long as the SFI program rules are interpreted to allow us to actively manage all of our multiple-use timberlands.		3	General editorial comment.	None

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Old Growth: This requirement has little or nothing to do with how old-growth is treated on SFI certified lands. At this point, there is very little old growth left in the lower 48. It is difficult to understand why SFI does not require the last remaining old-growth to be identified and protected on certified lands.	Adopt clear prohibitions on harvesting old-growth in the lower 48.	Adopt clear prohibitions on harvesting old-growth in the lower 48.	2	The SFI Standard requires program participants to identify and protect ecologically significant forests, including old-growth forests and Forests with Exceptional Conservation Value. Program participants are also required to protect threatened and endangered species, promote the conservation of native biological diversity, including species, wildlife habitats and ecological or natural community types at stand and landscape levels, and promote the conservation of biodiversity hotspots and high-biodiversity wilderness areas as defined by Conservation International.	None
8. Program to incorporate the role of prescribed or natural fire where appropriate.					
Delete.	Ineffective language. As worded "where appropriate", this has little value as an Indicator. Fire, mechanical, chemical use, etc. may all be appropriate in proving PM4.1.	Delete Indicator.	2	Task group disagrees with suggestion to delete indicator but has revised the requirement.	See proposed new Indicator 4.1.8
i believe the intent is to use more fire, not just incorporate the role... maybe just terminology		Program to increase the use of prescribed or natural fire where appropriate.	2	Task group reviewed comments and supports the use of prescribed fire as appropriate.	See proposed new Indicator 4.1.8
Objective 4, Performance Measure 4.1, Indicator 8 – I would suggest that the word “use” should replace the word “role” in this indicator.			2	Task group reviewed comments and supports the use of prescribed fire as appropriate.	See proposed new Indicator 4.1.8
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.					

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	Restoration of degraded or impacted riparian and forest areas: The SFI standard lacks requirements around restoration or enhancement of riparian or forested areas that were impacted through previously poor riparian or forest management. Given the lack of prohibition on conversion in the SFI standard, there is significant concern about how much forest conversion and associated ecological impacts have occurred to date on SFI-certified forest lands that are now promoted as sustainably managed. Current Language: 3.2. Program Participants shall have or develop, implement and document riparian protection measures based on soil type, terrain, vegetation, ecological function, harvesting system and other applicable factors. 4.1. Program Participants shall have programs to promote biological diversity at stand- and landscape-levels. 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. .	Recommendation: 3.2.1, 4.1.1, 4.2.2 Expand indicators to require program and specific indicators for restoration or enhancement of degraded areas to improve riparian areas, promote biodiversity and improve stand structure.	2	Task Group has enhanced language for Performance Measure 3.2 for protection of water quality. Revised indicators are intended to give more emphasis to protection of wetlands and riparian areas. Likewise the Task Group has developed Performances Measure directed at conversion of forest types and conversion of forest land.	See proposed Performance Measures 1.2, 1.3, and 3.2.

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Restoration of degraded or impacted riparian and forest areas: The SFI standard lacks requirements around restoration or enhancement of riparian or forested areas that were impacted through previously poor riparian or forest management. Given the lack of prohibition on conversion in the SFI standard, there is significant concern about how much forest conversion and associated ecological impacts have occurred to date on SFI-certified forest lands that are now promoted as sustainably managed.	3.2.1, 4.1.1, 4.2.2 Expand indicators to require program and specific indicators for restoration or enhancement of degraded areas to improve riparian areas, promote biodiversity and improve stand structure.	3.2.1, 4.1.1, 4.2.2 Expand indicators to require program and specific indicators for restoration or enhancement of degraded areas to improve riparian areas, promote biodiversity and improve stand structure.	2	Task Group as considered these comments. Proposed new language at Performance Measure 1.2 to address conversion of one forest type to another forest type along with new language at Performance Measure 3.2 to address increased protection of riparian areas and wetlands during all phases of management.	See proposed new language at PM 1.2 and PM 3.2.
PM 4.2 Indicators: 1. Collection of information on Forests with Exceptional Conservation Value 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 non-proprietary scientific information, time and assistance by staff, or in-kind or direct financial support. -					
what are participants supposed to do with the data? I think it is to report and improve the database.		Collection and reporting of information...	2	Suggested change does not enhance the indicator.	None
2. A methodology to incorporate research results and field applications of biodiversity and ecosystem research into forest management decisions.					
Restoration of degraded or impacted riparian and forest areas: The SFI standard lacks requirements around restoration or enhancement of riparian or forested areas that were impacted through previously poor riparian or forest management. Given the lack of prohibition on conversion in the SFI standard, there is significant concern about how much forest conversion and associated ecological impacts have occurred to date on SFI-certified forest lands that are now promoted as sustainably managed.	3.2.1, 4.1.1, 4.2.2 Expand indicators to require program and specific indicators for restoration or enhancement of degraded areas to improve riparian areas, promote biodiversity and improve stand structure.	3.2.1, 4.1.1, 4.2.2 Expand indicators to require program and specific indicators for restoration or enhancement of degraded areas to improve riparian areas, promote biodiversity and improve stand structure.	2	Task Group as considered these comments. Proposed new language at Performance Measure 1.2 to address conversion of one forest type to another forest type along with new language at Performance Measure 3.2 to address increased protection of riparian areas and wetlands during all phases of management.	See proposed new language at PM 1.2 and PM 3.2.
The Standard should also provide guidance or outline requirements regarding methods for measuring and monitoring biodiversity indicators to ensure programs are achieving desired results.			2	The comment is addressed by SFI Section 6 - Guidance to the SFI Standard - Part 2: Forest WIth Exceptinal Conservation Value and Part 3: Wildlife Habitats.	None
		A methodology and system to incorporate research results, practical experience and knowledge into management plans and practices.		Task group considered the comment. Research is addressed in new 4.1.2 and in new Indicator 16.1.5.	See proposed new language for Indicator 4.1.2 and 16.1.5.
Use this space to propose any removals or additions for Objective 4:					

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Delete 4.1.8. The wording of "where appropriate" in this Indicator renders it useless as an Indicator. One could argue that fire, mechanical, chemical use, etc. all may be "appropriate" in proving PM 4.1.			2	Task group reviewed comments and supports the use of prescribed fire as appropriate.	See proposed new Indicator 4.1.8
We propose that restructuring the Indicators for PM 4.1 would strengthen and clarify the intent of the performance measure. We have divided the indicators into 2 parts: an indicator that addresses biological diversity and another for endangered or threatened species. Each of these indicators then has a set of sub-indicators. We have retained much of the original wording in the Standard and added some suggestions for new sub-indicators as follows: Indicator 1 Proposed new language: Implement programs to conserve native biological diversity, including genetic diversity, species, wildlife habitats and ecological community types and shall include but not limited to: i. Identification of potential impacts of forest operations on biodiversity and implementation of government and/or industry best management practices during all phases of management activities to reduce the impact. ii. Development and implementation of criteria, as guided by regionally appropriate best scientific information, to retain stand-level wildlife habitat elements such as snags, stumps, mast trees, down woody debris, den trees and nest trees. iii.The inventory and assessment, conducted either individually or collaboratively, of the distribution and composition of tree species, cover types, age or size classes, and habitats at the individual ownership level and, where credible data are available, across the landscape, to ensure representation of all habitat types and age classes through time. iv. Conservation of old-growth forests and identified rare/uncommon ecosystems in the region of ownership/management. v. 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. vi. Assessment and incorporation of the role of natural disturbances such as fire where appropriate. This may include prescribed fires. vii. Internal documentation demonstrating biological diversity is conserved and meets desired objectives. Indicator: 2. Program to protect threatened and endangered species. Proposed new language: Implementation of program to protect threatened or endangered species and shall include but not limited to: i.Identifying, creating, and updating annually a list of threatened or endangered species that are known or believed to be present within the forest by consulting appropriate sources of information including government staff, species experts, local land users, and indigenous peoples. ii.Locating and protecting from damage and destruction the critical habitat (as identified by federal, state or provincial legislation) of threatened or endangered species through Program Participant management, cooperation with other stakeholders, or use of easements, conservation land sales, exchanges, or other conservation strategies. iii.Internal documentation that demonstrates threatened or endangered species are protected.			2	Task group considered comments and believes that revisions to requirements in Objective 3 and 4 address the comments.	See revisions to Objectives 3 and 4.
Objective 5. Management of Visual Quality and Recreational Benefits. To manage the visual impact of forest operations and provide recreational opportunities for the public.					
Comment	Rationale for proposed change	Proposed new language			
No comment			3	General editorial comment.	None
Require appropriate visual quality considerations on ALL harvesting along public roads and highways	Harvesting of SFI certified lands currently allows excessive clearcutting along major highways and areas of public travel	Appropriate visual quality considerations are required on all harvesting along public roads and highways	2	Task group disagrees with the comments that the standard allows excessive clearcutting along public roads and highways.	None
Performance Measure 5.1. Program Participants shall manage the impact of harvesting on visual quality.					

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Unclear how this is to happen	Requires some form of public review	Program participants shall manage the impact of harvesting on visual quality as identified by the public.	2	Task group reviewed the comments. Standard requires legal compliance with all federal, state, provincial regulations including rules where they exist for addressing visual quality.	None
Line of sight AOCs from the water bodies and roadways are of value for all users of the forests and should be implemented where applicable.			3	General editorial comment.	None
Where visual quality is a concern.			3	General editorial comment.	None
		Aesthetic Management Zones must be identified and appropriate harvesting guidelines developed to manage impacts of harvesting on visual quality	2	Task group reviewed the comments. The current standard requirements requires a program to address visual quality management which may include aesthetic management zones when warranted.	None
Performance Measure 5.2. Program Participants shall manage the size, shape and placement of clearcut harvests.					
Does not reference the end goal of long term management	Forest structure and polygon size has changed drastically in last 60 years	Program Participants shall manage the size, shape and placement of clear harvests in keeping with the end goal forest condition.	2	Task group believes that the current requirements of the standard address this comment.	None
The XXX does not support the clear cutting of any harvest area. Other regions have successfully implemented harvest tree retention of up to 10% of the harvest block volumes. Tree retention is representative of the harvest stand composition identified on mapping inventories.			2	Task group reviewed the comment. The standard at Objectives 3 and 4 does address retention without requiring a minimum amount deferring to legal requirements where they apply or water quality best management practices.	None
harvest openings.			3	General editorial comment.	None
We recommend that this approach be limited to specific areas where visual quality and recreational values have been identified as high priority.	see below	Program Participants shall manage the size, shape and placement of clearcut harvests to maintain visual quality and recreational values where these values have been identified as a high priority.	2	Task group believes that the current requirements of the standard address this comment.	None
PM 5.2 indicators: 1. Average size of clearcut harvest areas does not exceed 120 acres (50 hectares), except when necessary to meet regulatory requirements or to respond to forest health emergencies or other natural catastrophes					

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50 ha is a very small block. Does not match fire regime based forest management practices.	Size limits may be helpful when dealing with small scale forest management but do not match landscape based fire regime models.	Average size of cutblocks shall not exceed 50 ha except when necessary to replicate forest origin level events, forest health emergencies or other natural catastrophes. Reporting of exceptions to this will be based upon reporting against pre-determined allowable block size distributions on both size and frequency.	2	Task group believes that the current requirements of the standard address this comment.	None
Delete clearcut size limit.	The clearcut size of 120 acres is arbitrary. Even-aged harvest sizes and placement should be commensurate with the terrain, species type, silvicultural system, wildlife habitat goals, forest health needs (including salvage events).	Average size of even-aged harvests is justified by silvicultural system, wildlife habitat goals, forest health concerns, terrain, species type, and retention within harvest area.	2	Task group disagrees with the suggestion to delete the 120 acre cap on average clearcut size limit.	None
Depending on the definition of a clearcut, this may not fit in with current forest management paradigm of mimicking natural disturbance.	Have indicator allow of larger average size if part of acceptable long term forest management planning.	Average size of clearcut harvest areas does not exceed 120 acres (50 hectares), except when necessary to meet regulatory requirements, forest management planning models or to respond to forest health emergencies or other natural catastrophes	2	Task group believes that the current requirements of the standard address this comment.	None
In general, the maximum size of clearcut areas should probably be much lower (20 ha) with a provision to not use simple geometric harvest boundaries.	The visual impact of large clearcut areas that follow simple geometric patterns (e.g. rectangles) is to large and aesthetically unpleasant.		2	Task group believes that the current requirements of the standard address this comment.	None
Objective 5, Performance Measure 5.2, Indictor 1 – There should be exceptions to this average clearcut size for ecological reasons as well. Large patch management and priority open landscapes are examples in MN where you would actually want larger clearcut harvest areas. Same thing goes for the "green-up" requirement under Performance Measure 5.3, Indicator 3. Also, since these are all under an objective regarding visual quality/recreation, they should really only apply where visual impacts are a concern (i.e., not everywhere).			2	Task group believes that the current requirements of the standard address this comment.	None

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On public lands, 50 hectares may be too small to create landscape breaks to protect human life and communities from wildfires.	In jurisdictions frequented by wildfire, strategic fire breaks and large harvest areas are necessary to protect life, homes, communities and critical infrastructure from wildfire. Large harvested breaks in vegetation provide younger forest and areas less prone to burning. I suggest language is included to allow for larger harvest areas as strategic landscape fire breaks.	Average size of clearcut harvest areas does not exceed 120 acres (50 hectares), except when necessary to meet regulatory requirements or to respond to forest health emergencies, landscape level fire management breaks or other natural catastrophes.	2	Task group believes that the current requirements of the standard address this comment.	None
There should be flexibility to address other site-specific conditions when appropriate. The exception language that refers to "emergencies" or "natural catastrophes" is too inflexible.	For example, if larger cuts were necessary on specific sites to meet joint forestry-habitat objectives for moose browse and natural regeneration, there should be a process for allowing an individual sale to deviate. In addition, there are some very remote locations (e.g. small islands in Southeast Alaska) where it is financially impossible to make multiple entries to comply with an arbitrary 120 acre clearcut size restriction. Further, the clearcut size restriction frustrates efforts to eradicate dwarf mistletoe infestations from some areas.	Average size of clearcut harvest areas does not exceed 120 acres (50 hectares), except when necessary to meet regulatory requirements or to respond to forest health issues (e.g. creating a significant risk of windthrow) or other natural catastrophes.	2	Task group believes that the current requirements of the standard address this comment.	None
This has no teeth. Need to also set a maximum opening size.	Nobody is above the 120 acre average. Continual improvement calls for setting a maximum size limit.	Average size of 120 acres, not to exceed 200 acres, except...	2	Task group believes that the current requirements of the standard in Performance Measures 5.2 and 5.3 effectively address harvest unit opening size and adjacency.	None
This is being ignored in some cases		NO EXCEPTIONS TO THIS REQUIREMENT!	3	General editorial comment.	None
We recommend that this approach be limited to specific areas where visual quality and recreational values have been identified as high priority.	Managing average clearcut size to the 120 acres widespread can potentially have negative ecological implications (e.g. small clearcuts can increase forest fragmentation and influence predator/prey dynamics.	1.In areas where visual quality and recreational values have been identified as a priority, average size of clearcut harvest areas does not exceed 120 acres (50 hectares, except when necessary to meet regulatory requirements or to respond to forest health emergencies or other natural catastrophes.	2	Task group believes that the current requirements of the standard address this comment.	None

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The only quantitative indicator found was one to ensure the average cut block is less than 120 ha. How did SFI arrive at that number?			2	The cap on average clearcut opening size was implemented with the first version of the SFI forest management requirements. This size limit has proven to be an effective and realistic one reflecting the reality of forest management requirements across all regions of the US and Canada.	None
2. Documentation through internal records of clearcut size and the process for calculating average size.					
Documentation should be available to the public	This requirement is being abused or ignored	Documentation of clearcut sizes and adjacency requirements is available for public review	2	Task group reviewed the comment. For public forests this information can be obtained and is typically available at the planning phase. All program participants must demonstrate compliance with standard requirements for clearcut size and adjacency. These requirements are subject to third-party independent audit.	None
Performance Measure 5.3. Program Participants shall adopt a green-up requirement or alternative methods that provide for visual quality.					
This requirement is being abused		Remove alternative methods	3	General editorial comment.	None
All regenerated harvest stands must be declared “free to grow” by provincial, federal policy standards prior to adjacent harvest stands being cut. These harvest stands must not exceed the standards set out in Performance Measure 5.2 Indicator 1.			2	Task group believes that the current requirements of the standard address this comment.	None
PM 5.3 Indicators: 1. Program implementing the green-up requirement or alternative methods.					
Delete.	Unnecessary language. Why is it necessary to have a "program" to implement green-up requirements? Indicators 5.3.2 and 5.3.3 both allude to a methodology (aka "program") to achieve PM 5.3 and its green-up requirement.	Delete 5.3.1.	2	Task group disagrees with the suggestion to delete the requirements of Indicator 5.3.1, believing that the requirements compliment the requirements of Performance Measure 5.1 and Performance Measure 5.2.	None
Green up no longer required in Alberta Forest Management Planning	Alternative methods in place for green up	Program implementing the green up requirements or legislated alternative method.	2	Task group believes that the current requirements of the standard address this comment.” Alternative methods are allowed.	None
This is being abused or ignored			3	General editorial comment.	None
2. Harvest area tracking system to demonstrate conformance with the green-up requirement or alternative methods.					
Comment	Rationale for proposed change	Proposed new language			
No comment			3	General editorial comment.	None

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		NO EXCEPTIONS TO THE GREEN UP REQUIREMENT	3	General editorial comment.	None
3. Trees in clearcut harvest areas are at least 3 years old or 5 feet (1.5 meters) 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.					
Objective 5, Performance Measure 5.2, Indictor 1 – There should be exceptions to this average clearcut size for ecological reasons as well. Large patch management and priority open landscapes are examples in MN where you would actually want larger clearcut harvest areas. Same thing goes for the "green-up" requirement under Performance Measure 5.3, Indicator 3. Also, since these are all under an objective regarding visual quality/recreation, they should really only apply where visual impacts are a concern (i.e., not everywhere).			2	Task group believes that the current requirements of the standard address this comment.	None
The saplings should be much larger (3-10 meters) before any adjacent areas are clearcut.			2	Task group believes that the current requirements of the standard address adjacency and disagrees with the suggestion to increase the minimum green-up height to 10-30 feet (3m-10m).	None
This is considered to be a local joke in SW Louisiana			3	General editorial comment.	None
Performance Measure 5.4. Program Participants shall support and promote recreational opportunities for the public.					
PM 5.4 Indicator: 1. Provide recreational opportunities for the public, where consistent with forest management objectives.					
Does not address types of recreations, means of communication, frequency, or input process.	Recreational opportunities should be managed around either pre-determined areas and/or organizations to limit scope and scale. Said parties should also have a responsibility to not only communicate but track how input received is implemented.	Provide recreational opportunities for the public in keeping with the end goal forest management objectives and based upon regular communication by recreation groups into management of core recreation areas.	2	Task group believes that the current requirements of the standard address this comment. Recreation access is allowed on all public lands certified to the SFI forest management standard and access is available for many private forestland owners certified to the SFI forest management requirements.	None
Same comment as with Principle 5 - Managers of the forest may not have mandate for manage for recreation.	Change wording to not require forest manager to be responsible for something they can not manage.	Provide recreational opportunities for the public, where consistent with forest management objectives and federal/state/provincial/location regulations and plans.	2	Task group believes that the current requirements of the standard address this comment.	None

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Suggest rewording.	Clarification.	"Program Participants shall support and promote recreational opportunities for the public appropriate to the scope and scale of operations".	2	Task group believes that the current requirements of the standard address this comment.	None
This indicator is troubling because it's too vague and unenforceable given liability concerns.			2	Task group believes that the current requirements of the standard address this comment.	None
Use this space to propose any removals or additions for Objective 5:					
Delete: clearcut size limit in 5.2.1. Delete Indicator 5.3.1. Add: Additional Indicator 5.4.2. The Indicator for PM 5.4 is weak and generalized. To prove support for public recreational opportunities it seems appropriate to add an Indicator, perhaps just on large ownerships, that shows evidence of an evaluation or public process to determine just what recreational pursuits mesh with the forest management objectives. This could be evidenced through a long-range planning process or more focused recreation / access evaluation.			2	Task Group reviewed comment and disagrees with the suggestions to delete Indicator 5.2.1 an 5.3.1. Task group believes that the current requirements in Performance Measure 5.4 address the suggestion for an additional indicator 5.4.2.	None
Objective 6. Protection of Special Sites. To manage lands that are ecologically, geologically or culturally important in a manner that takes into account their unique qualities.					

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	The SFI requires no protection for roadless wildlands, biodiversity hotspots, and many other endangered forests in North America, except in those limited cases where they are already protected by law. The Standard has no provisions requiring protection of roadless wildlands, biodiversity hotspots, and other endangered forests in North America, except for its limited measures for threatened and endangered species (which are discussed below). The SFI Standard's provisions for biodiversity hotspots are only applicable to sourcing from outside of North America, despite the presence of significant hotspots within North America. "Special sites" are also defined as "sites that include ecologically or geologically unique or culturally important features" meaning companies can choose to not include roadless areas, biodiversity hotspots, and other endangered forests. Relevant SFI provisions: Objective 4 Conservation of Biological Diversity, Objective 6 Protection of Special Sites, and Indicator 11.1.1.		2	Roadless wildlands are found on public lands and are mandated and managed by rule of law. Task Group has developed requirements for a new Objective 9 the intent of which is to address biodiversity in fiber sourcing from non-certified lands. Also, the Task Group has proposed language addressing avoidance of illegally harvested wood.	See proposed language for Objective 9 and Performance Measure 9.1, and Performance Measure 15.1 and Indicators 15.1.4 and 15.1.5.

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	The SFI has no requirement for companies to help restore habitats for threatened and endangered wildlife, to enable their recovery, or to restore biodiversity and habitats more generally. The SFI Standard contains no requirements for certified forests to be managed to improve habitat conditions for threatened and endangered species per se, to help enable the species' recovery. Nor does the Standard require improvements in biological diversity more generally, in cases where forests have been degraded by past management. While indicators do call for a "program to promote the conservation of native biological diversity, including species, wildlife habitats and ecological community types" and a "program for assessment… of forest cover types, age or size classes and habitats… and take into account findings in planning and management activities." However, no required performance outcomes are associated with these indicators – including habitat improvements over baseline conditions, which for many SFI certified forests include an absence of important habitat types and species' groups. Relevant SFI provisions: Indicators 4.1.1 and 4.1.5, Objective 4 Conservation of Biological Diversity, and Objective 6 Protection of Special Sites.		2	The comments provided are not accurate in describing SFI Standard requirements. SFI has existing requirements to address protection of water quality in Objective 3 and the Task Group has proposed enhancements to Performance Measures 3.1 amd 3.2. SFI Objective 15 - Legal and and Regulatory Compliance requires compliance with all applicable federal, provincial, state and local forestry and related social and environmental laws and regulations. The Task Group has proposed langauge addressing avoidance of illegally harvested wood from the United States and Canada. Finally, annual third-party audits verify that the requirements regarding legal compliance are being addressed by the program participant.	See proposed language for Indicators 3.1.1, 3.1.3, 3.2.1 and 3.2.3 and Performance Measure 15.1 and Indicators 15.1.4 and 15.1.5.

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General comments ... appropriate to multiple sections of this Objective and others: SFI needs to beef up their language around "protection" (i.e., proper management) of special sites and biodiversity. It is not simply enough to require certificate holders to "have a program in place ...". The emphasis and focus of the auditor's should be on whether the programs or policies in place are actually effective in achieving the identified goal. It is more appropriate to require program participants to have an "effective program or policy in place to ... and operational guidelines to promote ..." That at least introduces the concept of effectiveness into the equation.		Add "effective" as a requirement rather than simply requiring a "program."	2	Task group considered comment and has revised Objective 4 to include much of current Objective 6 requirements. Regarding the coment addressing program effectiveness, during annual third-party audits the auditor must judge the effectiveness of a program which the PP has designed to meet the spirit and intent of the requirements.	See proposed revisions to Performance Measure 4.3 and Performance Measure 6.1.
Performance Measure 6.1. Program Participants shall identify special sites and manage them in a manner appropriate for their unique features.					
The Standard refers to managing special sites rather than explicitly stating that special sites should be protected (e.g., as exists in other objectives relating to soil and water). Guidance as to what may constitute an ecological special site, a geological special site, or a culturally important special site. Examples should be provided as part of the definition.	Unless defined, management does not guarantee the sites won't be damaged and the standard would be strengthened by stating that all special sites should be managed or protected so that participants cannot pick and choose which sites to protect. Monitoring and documenting the condition of special sites over time would also assist in enduring the desired results are being achieved.	Program Participants shall identify special sites and develop a management plan to protect them, in a manner appropriate for their unique features, from destruction or damage.	2	Task group considered comment and has revised Objective 4 to include much of current Objective 6 requirements.	See proposed revisions to Performance Measure 4.3 and Performance Measure 6.1.
The collection of Métis traditional land use throughout Ontario is fragmented and not fully documented. Broad traditional knowledge studies would need to be administered to fully understand and appreciate the extent in which the Métis rightfully utilize the area. Agreements must demonstrate a financial capacity to the Aboriginal Communities for conducting Traditional Knowledge studies over the FMU. A work plan must be established by the parties to ensure that Traditional Knowledge studies do not interfere with the SFL five (5) year renewal process.			2	Task group has drafted a new Objective 8 which is focused on recognition and respect of Indigenous Peoples Rights.	See proposed new Objective 8.

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PM 6.1 Indicator: 2. Appropriate mapping, cataloging and management of identified special sites.					
		Appropriate mapping and cataloging system to provide an inventory of, identified special sites.	2	Task group considered comment and has revised Objective 4 to include much of current Objective 6 requirements.	See proposed revisions to Performance Measure 4.3 and Performance Measure 6.1.
Use this space to propose any removals or additions for Objective 6:					
NEW Indicator for PM 6.1: Indicator 3. Monitoring and reporting program that demonstrates efficacy of protection and forest management measures for protecting special sites			2	Task group considered comment and has revised Objective 4 to include much of current Objective 6 requirements.	See proposed revisions to Performance Measure 4.3 and Performance Measure 6.1.
Objective 7. Efficient Use of Forest Resources. To promote the efficient use of forest resources.					
The stated goal of this objective is to promote efficient use of forest resources but the performance measure focuses only on timber/wood (forests generally provide more resources than just timber). We suggest the objective be rephrased to " Efficient use of Timber/Wood Resources" unless performance objectives related non-timber forest resources are also included. These additional indicators would assist in the preservation of multiple types of forest resources.	In general the standard does not contain a suite of objectives/requirements that ensure the long term sustainability of other forest related Ecological Goods and Services besides timber/wood products. We think including an objective that addresses this gap would strengthen the Standard overall. However, if that is not possible then we provide an alternate suggestion.	Efficient use of Timber/Wood Forest Resources	2	Task group reviewed comments and has revised the Objective title to make it clear that the Objective is focused on efficient use of fiber resources.	See proposed new title of Objective 7.
practices to minimize waste and ensure efficient utilization of harvested trees, where consistent with other SFI Standard objectives.					
Too vague. One person's waste might be another's biological legacy (e.g. coarse woody debris).			3	General editorial comment.	None
PM 7.1 Indicator: 1. Program or monitoring system to ensure efficient utilization, which may include provisions to ensure: a. management of harvest residue (e.g. slash, limbs, tops) considers economic, social and environmental factors (e.g. organic and nutrient value to future forests) and other utilization needs; b. training or incentives to encourage loggers to enhance utilization; c. cooperation with mill managers for better utilization of species and low-grade material; d. exploration of markets for underutilized species and low-grade wood and alternative markets (e.g. bioenergy markets); or e. periodic inspections and reports noting utilization and product separation.					
1.a recognition of residue may lead to increase wildfire fuels build-up temporarily		include in e.g. potential for increased fuels build-up	2	Task group considered comment and has revised Indicator 7.1.1 to reflect comment.	See proposed new requirements for Indicator 7.1.1.
As utilization becomes more intensive, need to consider guidelines for retention of woody material to be left on site. Also need to incorporate retention of live trees in clumps for wildlife and biodiversity purposes	Should consider a target of X tons per acre left on site.	Program to ensure efficient utilization, while also providing sufficient live tree and residue retention for wildlife and nutrient cycling objectives.	2	Task Group reviewed comments but it waiting for output of SFI / TNC research project to look at the issue of post harvest biodiversity and its relationship to fiber utilization.	None

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Suggest rewording Indicator 1.c. and 1.d.	1.c: Clarification. 1.d: The standard does not include a definition for "critical wildlife habitat elements". The assumption is that the indicator is referring to rare species and their habitats, but it goes on to say T&E species and FECV which seems repetitive and leads the reader to believe the indicator is referring to something more than rare species habitats. If this is the intent then "critical wildlife habitat elements" needs to be defined. If not, reword the indicator accordingly; suggested possible rewording is provided	1.c: "cooperation with supply chain for better utilization of species and low-grade material". 1.d: "conservation of critical wildlife habitat elements such as those associated with known occurrences of threatened and endangered species, and Forests with Exceptional Conservation Value contributing significantly to overall biodiversity".	2	Task group considered comment and believes the revised Indicator 7.1.1 addresses the comment.	See proposed new requirements for Indicator 7.1.1.
Objective 8. Landowner Outreach. To broaden the practice of sustainable forestry by forest landowners through fiber sourcing programs.					
AFF commends inclusion of landowner outreach within the SFI Standard to broaden the practice of sustainable forest management on all ownerships through selective fiber sourcing. We support continued inclusion of this objective in the SFI Standard.			3	Positive editorial comment.	None
Comment intended for Objectives 8-13 Do these objectives, performance measures and indicators apply only to non-certified fiber sources?	Rationale intended for Objectives 8-13 If so, then the standard should explicitly state that these indicators do not apply when sourcing from certified forests.	Proposed new language intended for Objectives 8-13 In the header: SFI 2010-2014 Standard Objectives 8-13 for Fiber Sourcing – Fiber sourcing within the United States and Canada (Objectives 8-10 apply) Add: Objectives 8 - 13 do not apply when sourcing from forests certified to an acceptable forest management standard as defined in Section 13, SFI Definitions.	2	Comment reviewed by Task Group and comment to be incorporated during next review period.	

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Landowners should have access to the same information as program participants however, this performance measure does not include the protection and maintenance of forest and soil productivity, water quality and quantity, and special sites mentioned in other objectives.	Landowners should have access to the same information as program participants to ensure the standards set by the SFI are upheld in all holdings.	Program Participants shall provide information to landowners for reforestation following harvest, for the use of best management practices for the protection and maintenance forest and soil productivity and water quality and quantity, and for identification and protection of special sites and of important habitat elements for wildlife and biodiversity, including Forests with Exceptional Conservation Value.	2	Task group considered comment and has revised selected fiber sourcing requirements to reflect comment.	See proposed revisions to Objectives 9, 10 and 11 and Objective 15 for fiber sourcing from US and Canada.
Procurement organizations don't always buy direct from forest owners. Need to recognize that open market wood comes in through Wood Producers		...by forest landowners and wood producers...	2	Task group considered comment and has revised selected fiber sourcing requirements to reflect comment.	See proposed revisions to Objectives 9, 10 and 11 and Objective 15 for fiber sourcing from US and Canada.
We support and echo the comments submitted by the Minnesota Master Logger Certification Program on 8/6/13. Please reference those comments and address them during the standard revision.			2	Task group considered comment and has revised selected QLP training requirements to reflect comment.	See proposed revision to training requirements in Objective 17.
management practices, and for identification and protection of important habitat elements for wildlife and biodiversity, including Forests with Exceptional					
Need to recognize most wood comes in through wood producers, and not direct purchased stumpage from landowners.		..information to landowners and wood producers for...	2	Task group considered comment and has revised selected fiber sourcing requirements to reflect comment.	See proposed revisions to Objectives 9, 10 and 11 and Objective 15 for fiber sourcing from US and Canada.
workshops, tours, etc.) to forest landowners, describing the importance and providing implementation guidance on: a. best management practices; b.					
Need to include Wood Producers that supply gatewood.		...to forest landowners and wood producers, describing the importance...	2	Task group considered comment and has revised selected fiber sourcing requirements to reflect comment.	See proposed revisions to Objectives 9, 10 and 11 and Objective 15 for fiber sourcing from US and Canada.
These should stay the same. It takes significant time and effort for the SICs to develop this material. Our several SICs are still adjusting somewhat to the last change. Additionally, these cover the essentials of timber harvesting.			2	Task group considered comment and has revised selected Landowner Outreach requirements to reflect comment.	See proposed revisions to Objective 18 for Landowner Outreach from US and Canada.

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This indicator too rigidly specifies what counts as acceptable information a Participant is to provide landowners, and should be modified.	Allow flexibility in what counts as meeting this criteria. For auditing purposes, only efforts covering all seven topics conform to the Indicator's requirements. Tours and newsletters are cited as possible venues. It is often not desirable or appropriate to cover all the required topics.	Program Participants shall provide regionally appropriate information or services (e.g. information packets, websites, newsletters, workshops, tours, etc.) to forest landowners, describing the importance of, and providing implementation guidance on, critical sustainable forestry concerns. The minimum topics to be covered through one or any combination of methods are;	2	Task group considered comment and has revised selected Landowner Outreach requirements but the major provisions remain in place.	See proposed revisions to Objective 18 for Landowner Outreach from US and Canada.
2. Program to address Forests with Exceptional Conservation Value in harvests of purchased stumpage.					
Program to address is too vague. Need a program to identify FECVs, communicate their location to purchased stumpage landowners and recommend management measures to conserve habitat.		Program to identify FECVs, communicate their location to landowners and recommend management measure to conserve their habitat.	2	Task group considered comment and has revised selected fiber sourcing requirements, QLP training and Landowner Outreach to reflect comment.	See proposed revisions to Objectives 9, 10, 11, 15 and 18.
3. Encourage forest landowners to participate in forest management certification programs.					
AFF supports the continued inclusion of this indicator. We further suggest specific inclusion of the ATFS standard for eligible family and small-scale ownerships and coordination with AFF in the development of those outreach materials.	ATFS draws on more than 70 years of experience is working with family woodlands and continues to serve as a central means for engaging family woodland owners utilizing a suite of tools and resources to promote sustainable forest management and engage them in certification on their own lands.	Encourage forest landowners to participate in forest management certification programs, including ATFS for eligible small-scale and family ownerships.	2	SFI standard still has requirement to communicate benefits of certification to landowners.	Requirement now Indicator 18.1.2.
I think we need to be specific that we are encouraging SFI and American Tree Farm System Certification.			2	Task group does not believe it is necessary identify specific standards - current standard requirement is addressing the comment.	None
This requirement to encourage landowners to become certified is too broad, and should be changed.	As written, any type of certification counts. Credible or not. Recognized by SFI, Inc. or not. This is not the intent.	Encourage landowners to become certified to the SFIS, CSA, American Tree Farm System®, or other forest management standard recognized as credible by SFI, Inc.	2	SFI currently recognizes all US and Canadian PEFC endorsed forest management standards - no change to standard required.	None

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We support the continued inclusion of this indicator.	We propose inclusion of the American Tree Farm Standard for eligible family and small-scale ownerships. The American Forest Foundation and its Tree Farm standard have demonstrated a 70+ year commitment to family forest landowners through policy actions, public communications and direct support through education and outreach.	Indicator 8.1.3: Encourage forest landowners to participate in forest management certification programs. In the U.S., promote the American Tree Farm Standard for certification of eligible family and small-scale ownerships.	3	General editorial comment.	None
Use this space to propose any removals or additions for Objective 8:					
raise a concern about the Qualified Logging Professional standard. The current program does not create sufficient differentiation between logging companies/loggers. SFI needs to place higher consideration to logger certification programs such as the Master Logger Certification program that operates in several states. The MLC program is a third party certification system that measures/evaluates actual performance and not simply a seat-time exposure to "training" events. As a member of a SFE committee I have been challenging some of the events that we have been giving credit for in the past (I recognize that this is local state issue). I feel that too often we have been more concerned with making it easy for a logger to get their required training hours rather than providing training that is relevant to loggers real needs.			2	Logger Forum was convened to look at issue of QLP requirements. Logger Forum drawn from SICs, Program Participants, American Loggers Council and loggers. New definition for QLP has been added to Section 13. New requirements for QLP continuing education have also been added to Objectives 17.	See proposed new requirements in Objective 17 - Training and Education. See new definition of WLP in Section 13.
Remove Objective 8 on landowner outreach from the sourcing requirements and move to Objective 17, which will be a landowner outreach requirement that applies to all SFI forest management and sourcing certificate holders. Landowner outreach has changed due to the movement away from direct fiber purchases with landowners. However, the SICS remained focused on providing landowner packets at each state level. The revision should help direct a change in focus to more proactive outreach (e.g. workshops with landowners through other organizations (not just the SICS), financial support to local level organizations other than SICs etc.) rather than just producing landowner packets. Producing landowner packets is not as efficient, nor as meaningful, as it was when we began in the 1990s.			2	Task group considered comment. Current Objective 8 Landowner Outreach requirements have been moved to revised Objective 18.	See proposed revisions to Objectives 18.

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We need some preamble language that states that expectations for procurement on Purchased Stumpage tracts are greater than for open-market sources. Thus, for purchased stumpage where the procurement organization has a timber deed to purchase the landowners timber, then there is an expectation that BMPS are required and FECVs identified and management measures are recommended.			2	Task group considered comment and has revised selected fiber sourcing requirements to reflect comment.	See proposed revisions to Objectives 9, 10 and 11 and Objective 15 for fiber sourcing from US and Canada.

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use of certified logging professionals, it must do more. 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. 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. Across the country, Private Forest Management (PFM) programs are facing budget reductions. In Minnesota, the PFM program is facing significant reductions and capacity as well. As a result, landowners won't be receiving the type of public management support and access to management plans as they have in the past. Yet, timber harvests on these lands will continue and are likely to increase as the market improves. With the success of Sustainable Forestry Initiative (SFI) in certifying large ownerships – a real growth potential for sustainable management and certification is family forestland. However, increasing the number of forest stewardship plans on family			2	Logger Forum was convened to look at issue of QLP requirements. Logger Forum drawn from SICs, Program Participants, American Loggers Council and loggers. New definition for QLP has been added to Section 13. New requirements for QLP continuing education have also been added to Objectives 17.	See proposed new requirements in Objective 17 - Training and Education. See new definition of QLP in Section 13.
Objective 9. Use of Qualified Resource and Qualified Logging Professionals. To broaden the practice of sustainable forestry by encouraging forest landowners to utilize the services of forest management and harvesting professionals.					
Comment	Rationale for proposed change	Proposed new language			

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In general, these terms need better defined. Several of the states use vastly different terms for the same trained logger and the differences are nuanced. The difference between trained and certified must be clearly laid out.			2	Logger Forum was convened to look at issue of QLP requirements. Logger Forum drawn from SICs, Program Participants, American Loggers Council and loggers. New definition for QLP has been added to Section 13. New requirements for QLP continuing education have also been added to Objectives 17.	See proposed new requirements in Objective 17 - Training and Education. See new definition for QLP in Section 13.
need to encourage wood producers to use Qualified Logging Professionals as well.			2	Task group considered comments and have made revisions to Objective 17.	See proposed revision to Indicator 17.1.5.
Remove objective 9	10.1.1 Fiber Sourcing Participants shall have a program for the purchase of raw material from wood producers that have completed training programs and are recognized as qualified logging professionals.	Remove Objective, and place a word like "promote" in 10.1.1	2	Task group considered comment but disagrees with suggestion to remove requirements for Objective 9 Use of Qualified Resource Professionals and Qualified Logging Professionals. Objective 9 requirements have been renumbered as Objective 11 in SFI 2015-2019.	See proposed Objective 11
PM 9.1 Indicators: 1. Program to promote the use of certified logging professionals (where available), qualified resource professionals and qualified logging professionals.					
"Certified logging professionals" are not available in most states and provinces.	Because "certified logging professionals" are not widely available, it will be important to maintain the "where available" qualifier in Indicator 9.1.1.	Maintain as is: Program to promote the use of certified logging professionals where available, qualified resource professionals and qualified logging professionals.	2	Requirement for use of certified logger professionals where available is in the new standard.	See proposed Indicator 17.1.5.
As written, the indicator focuses only on purchases direct from the forest landowner.	Certified sourcing should encourage trained loggers throughout their supply, both direct purchase from landowners and through suppliers.	Program for the purchase of raw material from certified logging professionals (where available) and from wood producers that have completed training programs and are recognized as qualified logging professionals.	2	Task group considered comments and have made revisions to Objective 17.	See proposed revision to Indicator 17.1.5.
		This should include trained loggers not just certified.	2	Task group considered comments and have made revisions to Objective 17.	See proposed revision to Indicator 17.1.5.
2. List of certified logging professionals and qualified logging professionals maintained by Program Participant, state or provincial agency, loggers' association or other organization.					

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Est-ce un indicateur essentiel ? Problématique de mise à jour ? Risque de faire des préférences ou des omissions ? Est-ce vraiment le rôle du participant au programme ?	none.	none.	2	Task group disagrees with the suggestion to remove this requirement. This requirement remains unchanged but is now renumbered as Indicator 11.1.2.	See Indicator 11.1.2.
Objective 10. Adherence to Best Management Practices. To broaden the practice of sustainable forestry through the use of best management practices to protect water quality.					
Eliminate 10.2.1 when effectively demonstrating conformance to 10.1.1, 10.1.2, and 10.1.3 for open market fiber sourcing.	Fiber Sourcing Participants shall implement policies, programs and contracts to harvest and purchase raw material requiring the use of Best management practices (10.1.1, 10.1.2, 10.1.3), then monitoring the use of BMP's (10.2.1) is redundant, unnecessary and an outdated requirement.	However, we are okay promoting BMP's, and that word can be placed in Objective 10.	2	Task group disagrees with eliminating Performance Measure 10.2.1 but does agree that written contracts should include requirement for use of BMPs.	See proposed language for Indicator 10.1.2
It is important this this continues to identify water quality as the overriding goal. Other BMPs can conflict with each other etc. This is the primary exposure to damage in timber harvesting.			2	Objective title and Performance Measure 10.2 still reflect emphasis on BMPs for water quality.	None

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	The SFI lacks performance measures for legal compliance, including in SFI certified forests, leaving certified operations' legality in question. While the Standard's core requirements for legal compliance in certified forests include a "system to achieve compliance with applicable federal, provincial, state, or local laws and regulations," and in the case of BMPs for water quality, "contract provisions that specify conformance…," there are no performance standards that trigger audits of whether actual practices in the forest are compliant with all applicable laws. At best, the Standard just requires auditors to look for "available regulatory action information. This approach will be inherently inadequate, given that regulators in many jurisdictions lack the resources to consistently assess compliance, and some agencies like the US Fish & Wildlife Service, which is the agency responsible for protecting threatened and endangered species, have virtually no enforcement capacity at all. As discussed below, the requirements for legal compliance for sourcing from non-certified forests are likely to be even less effective; these requirements tend to focus on only a couple of types of illegality out of many (timber theft from parks outside of North America and violations of BMPs within North America), and have virtually no requirements in terms of actual levels of compliance achieved in source forests. Relevant SFI provisions: Performance Measures 14.1 and 14.2 and their indicators; Performance Measure 3.1 and its indicators; Objectives 10 and 12 and their performance measures and indicators.		2	The comments provided are not accurate in describing SFI Standard requirements. SFI has existing requirements to address protection of water quality in Objective 3 and the Task Group has proposed enhancements to Performance Measures 3.1 amd 3.2. SFI Objective 15 - Legal and and Regulatory Compliance requires compliance with all applicable federal, provincial, state and local forestry and related social and environmental laws and regulations. The Task Group has proposed langauge addressing avoidance of illegally harvested wood from the United States and Canada. Finally, annual third-party audits verify that the requirements regarding legal compliance are being addressed by the program participant.	See proposed language for Indicators 3.1.1, 3.1.3, 3.2.1 and 3.2.3 and Performance Measure 15.1 and Indicators 15.1.4 and 15.1.5.

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We suggest the focus be expanded to also include best management practices for the protection and maintenance of water quantity and forest and soil productivity.	The objective as stated focuses on the use of best management practices to protect only water quality. Best management practices can be used to achieve many desired management objectives (e.g., forest productivity and soils). However, the definition of best management practices used in the current standard focuses only on water quality protection and is focussed on BMPs developed only by governments (see definition recommendations). BMPs developed internally (company and/or industry led) and externally (NGOs and/or government led) should be incorporated to support program participants that are exceeding minimum requirements.	To broaden the practice of sustainable forestry through the use of best management practices to manage and protect water quality and quantity as well as forest and soil productivity.	2	Task group reviewed comment but believe that BMPs for forest and sol productivity are addressed in other Objectives hence no change needed to this Objective.	None
Performance Measure 10.1. Program Participants shall clearly define and implement policies to ensure that facility inventories and fiber sourcing activities do not compromise adherence to the principles of sustainable forestry.					
Chain of custody reporting must take into consideration that forest sustainability best practices are adhered to regardless of where fiber is acquired from, crown vs private land.			4	Comments addressed by Chain of Custody Task Group. For content to be considered as certified for use in product with an SFI CoC claim or SFI CoC label it must by certified to one of the acceptable forest management standards.	None
PM 10.1 Indicators:1. Program for the purchase of raw material from certified logging professionals (where available) and from wood producers that have completed training programs and are recognized as qualified logging professionals. -					
Dans certains cas, les achats se font par l'intermédiaire d'organismes de vente (ex.: Syndicats) qui se spécialisent dans le transfert de la matière première. La reconnaissance de professionnels qualifiés en matière d'exploitation forestière n'est pas toujours établie et pas toujours de façon équivalente entre les états ou provinces.	none.	none.	3		None
Indicators 10.1 and 10.2 could be combined.	Clarification. Is there a specific reason why these two indicators are separated? There appears to be an opportunity to combine them.	Combine indicator 1 and 2 into a single indicator.	2	Task group believe that Indicators 10.1.1 and 10.1.2 should remain separate but is proposing new language for Indicator 10.1.2.	See proposed language for Indicator 10.1.2

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See comments in removals/additions comments box.			3	General editorial comment.	None
Chain of custody reporting must take into consideration that forest sustainability best practices are adhered to regardless of where fiber is acquired from, crown vs private land.			4	Comments addressed by Chain of Custody Task Group. For content to be considered as certified for use in product with an SFI CoC claim or SFI CoC label it must by certified to one of the acceptable forest management standards.	None
3. Contracts for the purchase of raw material include provisions requiring the use of best management practices.					
This is unenforceable due to employee contractor relationships. There is no requirement to verify and there should not be. It adds language to a purchase agreement that adds little value		Eliminate.	2	Task group disagrees with eliminating Indicator 10.1.2 and believes that written contracts should include requirement for use of BMPs.	See proposed language for Indicator 10.1.2
4. Program to address adverse weather conditions.					
Mieux définir cet indicateur.	none.	none.	2	Task group believes that current wording for this indicator is sufficient and doe not need further definition.	None
Performance Measure 10.2. Program Participants shall monitor the use of best management practices.					
The Performance measure makes no mention of the monitoring frequencies or by whom. To ensure compliance there must be a frequency of monitoring developed and a third party to perform the monitoring.			2	Task group reviewed comment but believes the current indicator language is sufficient.	None
We need to move on. With BMPs at 90-95% in most states, we need to delete the requirement to monitor BMPs.		Remove 10.2. We have accomplished the objective and we need to take a new challenge and stop beating on this.	2	Task group disagree with the comment - Performance Measure 10.2 remains unchanged.	None
PM 10.2 Indicators: 1. A verifiable monitoring system to: a. monitor the use of best management practices by wood producers supplying the Program Participant; and b. evaluate use of best management practices across the wood and fiber supply area.					
Delete these Indicators. Implementation of BMPS is effectively accomplished. Lets move on!			2	Task group disagrees with comment.	None
2. Use of information from the verifiable monitoring system to maintain rates of conformance to best management practices and to identify areas for improved performance.					
Delete these Indicators. Implementation of BMPS is effectively accomplished. Lets move on!			2	Task group disagrees with comment.	None

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Drop the word "maintain"	Changes in sampling system often cause drops in %	Use of information from the verifiable monitoring system to promote improvement of conformance.....	2	Task group reviewed this comment. Concern was that auditors are focused on the ability of Program Participants to demonstrate maintenance of compliance figures year over year. In some state monitoring programs the sampling methodologies/intensities have been changed and these changes can have an effect on trends in rates of compliances. During the 2013 SFI Annual Conference this comment was brought up for discussion in the Auditors Forum. Auditors believe that Program Participants may need to develop alternative approaches for demonstrating conformance to this indicator if existing measures are no longer as effective as they once were.	None
The requirement for use of the monitoring system results does not specifically recognize the value of providing information directly to wood producers, which is a key “low-hanging-fruit” opportunity for improvement.	The most significant result of the monitoring system is its direct impact on wood producers who are aware they are being monitored, often take part in the inspections, and should always know the results. This facilitates maintaining high levels of BMP compliance, as well as fostering improvement. And as this is already occurring, either formally or informally, it should be recognized in the Indicator.	Different additions or changes could be considered, such as: Use of the information to provide direct feedback to monitored wood producers on performance, encourage improvement when needed, and to ensure corrective actions are taken on significant BMP noncompliance's discovered that impact or may impact water quality. (new Indicator) or; Use of information from the verifiable monitoring system to maintain rates of conformance to best management practices, identify areas for improved performance, and to interact with monitored wood producers to foster continuous improvement. (modify existing Indicator)	2	Task group reviewed this comment. Task group is of the opinion that direct feedback is passed back to wood producers where it is possible to make this directly linkage. Likewise, SIC do review trends in BMP monitoring items and use these to refine logger training. Indicator wording is sufficient.	None

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Use this space to propose any removals or additions for Objective 10:					
Remove indicator 10.1.1 based on the proposed revision to Objective 9 to encompass trained logger requirements for all supply in one objective.			2	Task group has moved this requirement to revised Objective 17	See proposed language for Indicator 17.1.5.
The objective specifically addresses BMP's for water quality yet none of the indicators do.				Task group reviewed comment. Current definition of BMPs is specific to protection of water quality therefore specific reference to water quality in the Performance Measures and Indicator is not necessary.	None
Objective 11. Promote conservation of biological diversity, biodiversity hotspots and High-Biodiversity Wilderness Areas. To broaden the practice of sustainable forestry by conserving biological diversity, biodiversity hotspots and high-biodiversity wilderness areas.					
Comment	Rationale for proposed change	Proposed new language			
These Objectives are so rare that they should be a Module to the SFI, not three of the major Objectives. Remove to a Module dealing with procurement outside of North America.			2	Task group disagrees with the comment. The "off-shore" (outside US and Canada) fiber sourcing requirements of the SFI standard are to remain in the main body of the Standard.	None
The SFI requires no protection for roadless wildlands, biodiversity hotspots, and many other endangered forests in North America, except in those limited cases where they are already protected by law. The Standard has no provisions requiring protection of roadless wildlands, biodiversity hotspots, and other endangered forests in North America, except for its limited measures for threatened and endangered species (which are discussed below). The SFI Standard's provisions for biodiversity hotspots are only applicable to sourcing from outside of North America, despite the presence of significant hotspots within North America. "Special sites" are also defined as "sites that include ecologically or geologically unique or culturally important features" meaning companies can choose to not include roadless areas, biodiversity hotspots, and other endangered forests. Relevant SFI provisions: Objective 4 Conservation of Biological Diversity, Objective 6 Protection of Special Sites, and Indicator 11.1.1. The SFI's requirements for biodiversity hotspots and similar areas outside North America are also incomplete, and do not require any particular protection outcomes. While the SFI purports to protect biodiversity and wilderness outside of North America via the Standard's requirements for fiber sourcing, the Standard's requirements only invoke the conservation of areas that happen to be designated as "biodiversity hotspots" and "high biodiversity wilderness areas" by a particular SFI program supporter. No recognition is afforded to other intact forests, endangered species' habitats, or other endangered forests. More importantly, the relevant indicator does not require that such areas actually be protected to any degree, but instead just states that "fiber sourcing… promotes conservation of…" such areas. Relevant SFI provisions: Indicator 11.1.1, and the Guidance to SFI 2010-2014 Standard.			2	Roadless wildlands are found on public lands and are mandated and managed by rule of law. Task Group has developed requirements for a new Objective 9 the intent of which is to address biodiversity in fiber sourcing from non-certified lands. Also, the Task Group has proposed language addressing avoidance of illegally harvested wood.	See proposed language for Objective 9 and Performance Measure 9.1, and Performance Measure 15.1 and Indicators 15.1.4 and 15.1.5.

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		Change title to "Objective 11. Promote Conservation of Biological Diversity." Eliminate "biodiversity hotspots and high biodiversity wilderness areas"	2	Objective 11 has been renumbered as Objective 12 but the title has not been changed.	None
Performance Measure 11.1. Program Participants shall ensure that their fiber sourcing programs support the principles of sustainable forestry, including efforts to promote conservation of biological diversity.					
PM 11.1 Indicators: 1. Fiber sourcing from areas outside the United States and Canada promotes conservation of: a. biodiversity hotspots and high-biodiversity wilderness areas utilizing information from Conservation International; and b. biological diversity utilizing information from organizations such as the Alliance for Zero Extinction, World Wildlife Fund, World Resources Institute and International Union for Conservation of Nature.					
The SFI standard should address biodiversity more proactively in the United States and Canada, not just outside of North America.	Currently, the standard addresses biodiversity in the land management section and in procurement section it focuses on diversity when a participant buys timber directly. The standard currently also focuses on biodiversity when sourcing outside of the United States. Language on biodiversity as it is addressed in the United States should be strengthened.	"Fiber sourcing promotes conservation of : (a)Biodiversity hotspots and high-biodiversity wilderness areas utilizing information from Conservation International; and (b)biological diversity utilizing information from organizations such as Alliance for Zero Extinction, World Wildlife Fund, World resources Institute, International Union for Conservation of Nature, The Nature Conservancy, Nature Serve and other credible sources. (c) Biodiversity through local and regional level landscape assessments (d) Biodiversity through involvement with local or regional conservation projects (moving from Objective 17.1.5)	2	Task group reviewed comment and has proposed a new ***Objective 9 Biodiversity in Fiber Sourcing - To broaden the practice of sustainable forestry by conserving biological diversity.***	See proposed new Objective 9
3. Documented information that includes knowledge about direct suppliers' application of the principles of sustainable forestry.					
11.1.3 would still be appropriate for outside of North America only.	Supply outside of North America may have greater risk, so some additional due diligence should be required to demonstrate that risk is being managed by certificate holders.	Program to address direct suppliers' application of the principles of sustainable forestry when sourcing outside of the United States and Canada.	2	This requirement is unchanged but has been renumbered as 12.1.3.	None
Redundant to other indicators.	If the supplier is following BMPs and there is provision for regeneration as provided in other sections then this indicator is unnecessary.	Remove (3).	2	Task group disagrees with comment - Indicator remains but has been renumbered as 12.1.3.	None

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SFI 2010-2014 STANDARD COMMENT	RATIONALE FOR PROPOSED CHANGE	PROPOSED NEW LANGUAGE	COMMENT REVIEW	RATIONALE	REVISED OR PROPOSED NEW LANGUAGE
Objective 12. Avoidance of Controversial Sources including Illegal Logging. To broaden the practice of sustainable forestry by avoidance of illegal logging.					
Clarification needed.	Wording doesn't cover intent. There is not a clear link to how the practice of sustainable forestry will be broadened by avoiding illegal logging. Re-word the sentence "To broaden the practice...."	Illegal logging is recognized as being detrimental to sustainable forestry practices.	2	Objective has been renumbered as Objective 13 but otherwise remains unchanged.	None
Fiber sourcing by facilities enrolled in the SFI program from sources outside the United States and Canada: We recognize that currently wood imports represent only a small percentage of wood sourced by SFI Program Participants. However, given the legal risks under Lacey Act, EUTR and timber legality legislation, strengthening this language and providing accompanying auditor guidance is important. Currently the standard reads that if a participant just has a process or program, that would meet the standard.	We recommend a clearer articulation in the SFI standard for what constitutes a rigorous and auditable “process” and “program” for this element.	We recommend a clearer articulation in the SFI standard for what constitutes a rigorous and auditable “process” and “program” for this element.	2	Task group has proposed new language with example sources of information that could be used to develop a more rigorous process for assessing risk of sourcing materials from illegal logging.	See proposed language for Indicator 13.1.1 and 13.1.2.

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SFI 2010-2014 STANDARD COMMENT	RATIONALE FOR PROPOSED CHANGE	PROPOSED NEW LANGUAGE	COMMENT REVIEW	RATIONALE	REVISED OR PROPOSED NEW LANGUAGE
	The SFI lacks performance measures for legal compliance, including in SFI certified forests, leaving certified operations' legality in question. While the Standard's core requirements for legal compliance in certified forests include a "system to achieve compliance with applicable federal, provincial, state, or local laws and regulations," and in the case of BMPs for water quality, "contract provisions that specify conformance…," there are no performance standards that trigger audits of whether actual practices in the forest are compliant with all applicable laws. At best, the Standard just requires auditors to look for "available regulatory action information. This approach will be inherently inadequate, given that regulators in many jurisdictions lack the resources to consistently assess compliance, and some agencies like the US Fish & Wildlife Service, which is the agency responsible for protecting threatened and endangered species, have virtually no enforcement capacity at all. As discussed below, the requirements for legal compliance for sourcing from non-certified forests are likely to be even less effective; these requirements tend to focus on only a couple of types of illegality out of many (timber theft from parks outside of North America and violations of BMPs within North America), and have virtually no requirements in terms of actual levels of compliance achieved in source forests. Relevant SFI provisions: Performance Measures 14.1 and 14.2 and their indicators; Performance Measure 3.1 and its indicators; Objectives 10 and 12 and their performance measures and indicators.		2	Comment does not accurately describe the requirements of the SFI Standard. Legal compliance with applicable legislation and regulation is a requirement for all Program Participants. Task Group has however, revised language for Indicator 15.1.4 and 15.1.5.	See proposed language for Indicator 15.1.4 and 15.1.5.

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	Fiber sourcing by facilities enrolled in the SFI program from sources outside the United States and Canada: We recognize that currently wood imports represent only a small percentage of wood sourced by SFI Program Participants. However, given the legal risks under Lacey Act, EUTR and timber legality legislation, strengthening this language and providing accompanying auditor guidance is important. Currently the standard reads that if a participant just has a process or program, that would meet the standard. Current Language: 12.1.1 Process to assess the risk that the Program Participant's fiber sourcing program could acquire material from illegal logging 12.1.2. Program to address any significant risk identified under 12.1.1	Recommendation: We recommend a clearer articulation in the SFI standard for what constitutes a rigorous and auditable "process" and "program" for this element.	2	Legal compliance with applicable legislation and regulation is a requirement for all Program Participants. Task Group has proposed several revisions to the Standard to enhance the assessment of risk of sourcing from illegal logging. These changes include a revise Illegal Logging definition (now has a reference to the EU Timber Regulation), a revised definition for Controversial Sources, revisions to Performance Measure 13.1 and to Indicators 15.1.4 and 15.1.4.	See proposed language for Performance Measure 13.1; Indicator 15.1.4 and 15.1.5; Illegal Logging definition and Controversial Logging definition.
These Objectives are so rare that they should be a Module to the SFI, not three of the major Objectives. Remove to a Module dealing with procurement outside of North America.			2	Task group disagrees with the comment. The "off-shore" (outside US and Canada) fiber sourcing requirements of the SFI standard are to remain in the main body of the Standard.	None
Performance Measure 12.1. Program Participants shall ensure that their fiber sourcing programs support the principles of sustainable forestry, including efforts to thwart illegal logging.					

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SFI 2010-2014 STANDARD COMMENT	RATIONALE FOR PROPOSED CHANGE	PROPOSED NEW LANGUAGE	COMMENT REVIEW	RATIONALE	REVISED OR PROPOSED NEW LANGUAGE
Fiber sourcing by facilities enrolled in the SFI program from sources outside the United States and Canada: We recognize that currently wood imports represent only a small percentage of wood sourced by SFI Program Participants. However, given the legal risks under Lacey Act, EUTR and timber legality legislation, strengthening this language and providing accompanying auditor guidance is important. Currently the standard reads that if a participant just has a process or program, that would meet the standard.	We recommend a clearer articulation in the SFI standard for what constitutes a rigorous and auditable "process" and "program" for this element.	We recommend a clearer articulation in the SFI standard for what constitutes a rigorous and auditable "process" and "program" for this element.	2	Task group has proposed new language with example sources of information that could be used to develop a more rigorous process for assessing risk of sourcing materials from illegal logging.	See proposed language for Indicator 13.1.1 and 13.1.2.
Trespassing outside of allocated harvest stands is an offense under the CFSA, therefore must be considered illegal logging. All such offenses must be report regardless of size and scope.			2	This comment is specific to the Ontario Crown Forest Sustainability Act and therefore is not applicable in the context of fiebr sourced from illegal logging outside of the US and Canada.	None
Suggest rewording.	Clarification.	Reword current performance measure as follows: Program Participants shall ensure that their fiber sourcing programs support the principles of sustainable forestry, including efforts to reduce the risk of illegal logging.	2	Task group has made one editorial change to this Performance Measure otherwise requirement is unchanged. Performance Measure is now numbered 13.1.	None
This Performance Measure addresses illegal logging, but does not reference Section 7 Guidance - Legality Requirements and Policies for Avoidance of Illegal Logging.	This Guidance provides significant information and requirements. It would provide better clarity if it was referenced in the standard.	Add reference to Legality Guidance	2	Performance Measure 13.1 now has reference to SFI Illegal Logging Policy in Section 7.	See Performance Measure 13.1.
PM 12.1 Indicators: 1. Process to assess the risk that the Program Participant's fiber sourcing program could acquire material from illegal logging.					
Fiber sourcing by facilities enrolled in the SFI program from sources outside the United States and Canada: We recognize that currently wood imports represent only a small percentage of wood sourced by SFI Program Participants. However, given the legal risks under Lacey Act, EUTR and timber legality legislation, strengthening this language and providing accompanying auditor guidance is important. Currently the standard reads that if a participant just has a process or program, that would meet the standard.	We recommend a clearer articulation in the SFI standard for what constitutes a rigorous and auditable "process" and "program" for this element.	We recommend a clearer articulation in the SFI standard for what constitutes a rigorous and auditable "process" and "program" for this element.	2	Task group has proposed new language with example sources of information that could be used to develop a more rigorous process for assessing risk of sourcing materials from illegal logging.	See proposed language for Indicator 13.1.1 and 13.1.2.

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SFI 2010-2014 STANDARD COMMENT	RATIONALE FOR PROPOSED CHANGE	PROPOSED NEW LANGUAGE	COMMENT REVIEW	RATIONALE	REVISED OR PROPOSED NEW LANGUAGE
2. Program to address any significant risk identified under 12.1.1.					
Fiber sourcing by facilities enrolled in the SFI program from sources outside the United States and Canada: We recognize that currently wood imports represent only a small percentage of wood sourced by SFI Program Participants. However, given the legal risks under Lacey Act, EUTR and timber legality legislation, strengthening this language and providing accompanying auditor guidance is important. Currently the standard reads that if a participant just has a process or program, that would meet the standard.	We recommend a clearer articulation in the SFI standard for what constitutes a rigorous and auditable "process" and "program" for this element.	We recommend a clearer articulation in the SFI standard for what constitutes a rigorous and auditable "process" and "program" for this element.	2	Task group has proposed new language with example sources of information that could be used to develop a more rigorous process for assessing risk of sourcing materials from illegal logging.	See proposed language for Indicator 13.1.1 and 13.1.2.
4. Documented information that includes knowledge about direct suppliers' application of the principles of sustainable forestry.					
How does this relate to Controversial Sources?	Eliminate this section.		2	Task group believes that Program Participants sourcing from outside US and Canada should have access to information that documents their suppliers' application of SFM in the country of origin. This is a coarse filter approach that is further reinforced with the requirements of Indicator 13.1.1 and 13.1.2.	Indicator renumbered but otherwise Is unchanged.
Use this space to propose any removals or additions for Objective 12:					
Eliminate Objective 12 and move to Objective 14.1 as a requirement for all wood and fiber sources for all certificate holders. It can be perceived that legality is an issue we address only outside of U.S. Strengthen the legality requirements and avoiding controversial sourcing so as to cover what we are doing in the United States and by making it clear these issues apply everywhere and are addressed by both fiber sourcing and land management within the U.S. and outside of the U.S.			2	Task group reviewed comment and has proposed new language in Objective 15 (Legal and Regulatory Compliance) that makes avoidance of materials sourced from illegally harvested wood a requirement for all fiber regardless of geography of origin.	See proposed language for Performance Measure 15.1 and Indicator 15.1.4.
I think that this indicator should be removed from the exempt portion. Even small scale illegal logging or timber theft should be eliminated from the program. A due diligence approach and exclusion of suppliers engaged in illegal or fraudulent activity is prudent.			3	Not possible to determine which Indicator this comment is linked to.	None
avoiding controversial sources.					

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How do you broaden the practice of sustainable forestry by avoiding controversial sources? The intent seems to be to promote social change rather than promote sustainable forestry. If there is an expectation that avoiding social controversy will result in broadening sustainable forestry I think is not a logical, defendable conclusion.	Avoiding something doesn't change it.	Think through what the intent of this objective is. The goal has negative emphasis rather than positive.	2	Task Group reviewed this comment and decided to retain this Objective. Trend in other recognized SFM and CoC standards is to not support logging from unacceptable practices including regions without effective social laws. Retaining this objective means SFI standard continues to be consistent with this global practice.	Objective renumbered but otherwise unchanged.
Objective 13. Avoidance of Controversial Sources: The current SFI standard assumes that no wood from North America is "controversial". While the US and Canada have a stronger system of laws and law enforcement than many countries, there are still instances of timber theft and impacts on indigenous peoples that could put some fiber into this category.	Articulate in the SFI standard that controversial sources could occur anywhere, not just outside North America and that adequate due diligence is required regardless of geographic region.	Articulate in the SFI standard that controversial sources could occur anywhere, not just outside North America and that adequate due diligence is required regardless of geographic region.	2	Task group reviewed comment and has proposed new language in Objective 15 (Legal and Regulatory Compliance) that makes avoidance of materials sourced from illegally harvested wood a requirement for all fiber regardless of geography of origin.	See proposed language for Performance Measure 15.1 and Indicator 15.1.4.
The current SFI standard assumes that no wood from North America is "controversial". While the US and Canada have a stronger system of laws and law enforcement than many countries, there are still instances of timber theft and impacts on indigenous peoples that could put some fiber into this category.	While the US and Canada have a stronger system of laws and law enforcement than many countries, there are still instances of timber theft and impacts on indigenous peoples that could put some fiber into this category.	Recommendation: Articulate in the SFI standard that controversial sources could occur anywhere, not just outside North America and that adequate due diligence is required regardless of geographic region.	2	Task group reviewed comment and has proposed new language in Objective 15 (Legal and Regulatory Compliance) that makes avoidance of materials sourced from illegally harvested wood a requirement for all fiber regardless of geography of origin.	See proposed language for Performance Measure 15.1 and Indicator 15.1.4.
These Objectives are so rare that they should be a Module to the SFI, not three of the major Objectives. Remove to a Module dealing with procurement outside of North America.			2	Task group disagrees with the comment. The "off-shore" (outside US and Canada) fiber sourcing requirements of the SFI standard are to remain in the main body of the Standard.	None

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	Objective 13. Avoidance of Controversial Sources: The current SFI standard assumes that no wood from North America is "controversial". While the US and Canada have a stronger system of laws and law enforcement than many countries, there are still instances of timber theft and impacts on indigenous peoples that could put some fiber into this category.	Recommendation: Articulate in the SFI standard that controversial sources could occur anywhere, not just outside North America and that adequate due diligence is required regardless of geographic region.	2	Legal compliance with applicable legislation and regulation is a requirement for all Program Participants. Task Group has proposed several revisions to the Standard to enhance the assessment of risk of sourcing from illegal logging from within the United States and Canada. These changes include a revise Illegal Logging definition (now has a reference to the EU Timber Regulation), a revised definition for Controversial Sources, revisions to Indicators 15.1.4 and 15.1.4 .	See proposed language for Indicators 15.1.4 and 15.1.5; Illegal Logging definition and Controversial Logging definition.
		Recommendation is to move current objectives 12 and 13 to Objective 14, therefore requirements for both forest land management and fiber sourcing. (See objective 14.2 for new language)	2	Task group disagrees with the comment. Objectives 12 and 13 have been retained, Objective 12 revised and both are have been renumbered. However, Objective 15 has been revised to make avoidance of material from illegal logging a requirement a requirement for all purchased fiber regardless of geography of origin.	See proposed language for Objectives 13 and 15.
Performance Measure 13.1. Program Participants shall avoid controversial sources and encourage socially sound practices.					
		"...shall avoid controversial sources within the context of generally accepted socio-economic standards."	2	Task group reviewed comment but decided that suggested change would not add clarity to this Indicator.	None
following: a. workers' health and safety; b. fair labor practices; c. indigenous peoples' rights; d. anti-discrimination and anti-harassment measures; e. prevailing wages;					
We are already buried under mountains of "social mandates", so I presume that this only applies to timber from other countries.			3	General editorial comment - by "other countries" it is assumed that the commenter means outside US and Canada.	None
Use this space to propose any removals or additions for Objective 13:					

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Eliminate Objective 13 and move to Objective 14.3 to apply to all wood and fiber sources for all certificate holders. It can be perceived that social issues are addressed only outside of North America. Strengthen the social requirements so as to cover what we are doing in North America and make it clear these issues apply everywhere and are addressed by both fiber sourcing and land management within and outside of North America.			2	Task group disagrees with this comment. Objective 15 requires legal compliance with all applicable federal and state / provincial legislation. Much of this legislation is directed at labor practices, and the workplace health and safety of workers.	None
Objective 14. Legal and Regulatory Compliance. Compliance with applicable federal, provincial, state and local laws and regulations.					

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	The SFI lacks performance measures for legal compliance, including in SFI certified forests, leaving certified operations' legality in question. While the Standard's core requirements for legal compliance in certified forests include a "system to achieve compliance with applicable federal, provincial, state, or local laws and regulations," and in the case of BMPs for water quality, "contract provisions that specify conformance…," there are no performance standards that trigger audits of whether actual practices in the forest are compliant with all applicable laws. At best, the Standard just requires auditors to look for "available regulatory action information. This approach will be inherently inadequate, given that regulators in many jurisdictions lack the resources to consistently assess compliance, and some agencies like the US Fish & Wildlife Service, which is the agency responsible for protecting threatened and endangered species, have virtually no enforcement capacity at all. As discussed below, the requirements for legal compliance for sourcing from non-certified forests are likely to be even less effective; these requirements tend to focus on only a couple of types of illegality out of many (timber theft from parks outside of North America and violations of BMPs within North America), and have virtually no requirements in terms of actual levels of compliance achieved in source forests. Relevant SFI provisions: Performance Measures 14.1 and 14.2 and their indicators; Performance Measure 3.1 and its indicators; Objectives 10 and 12 and their performance measures and indicators.		2	Comment does not accurately describe the requirements of the SFI Standard. Legal compliance with applicable legislation and regulation is a requirement for all Program Participants. Task Group has revised language for Indicators 15.1.4 and 15.1.5.	See proposed language for Indicator 15.1.4 and 15.1.5.

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Review the mandatory U.S and Canadian biotech regulatory processes and procedures.	In our experience the U.S. and Canada both have robust biotech regulatory systems in place as well as the capacity to enforce those regulations. As certification systems such as the SFI are voluntary steps that go beyond legally required actions, we encourage the SFI to consider the legal requirements imposed on biotech trees. Both countries employ evaluation processes that require environmental, health, and safety analyses of biotech products. By understanding what is required of biotech trees by the government, the SFI will be in a position to make decisions regarding biotech tree use that complement regulations.	NA	2	Task group has revised language to clarify the scope of forest tree biotechnology indicator. Indicator now applies to international forest tree biotechnology protocols that have been ratified by the US or Canada depending on jurisdiction.	See proposed language for Indicator 16.1.2.
environmental laws and regulations.					
Objective 14, Performance Measures 14.1 and 14.2 – There appears to be duplication with these two PMs. Both require program participants to "comply with applicable federal, state . . . . social laws." Since 14.2 is specific to social laws, it would seem reasonable to remove it from 14.1.			2	task group reviewed comment but believes it is important to maintain two separate performance measures: one requires a system to address compliance with social and environmental laws and another to require a policy demonstrating commitment to all social laws for the country in which they operate (US or Canada). However requirements of Performance Measure 15.1 have been revised.	See proposed language for Indicators 15.1.1, 15.1.4 and 15.1.5.
PM 14.1 Indicator: 3. Demonstration of commitment to legal compliance through available regulatory action information					
Should be dropped.	Regulatory action information is available for "bad actors".		3	General editorial comment - requirement is retained but Indicator has been renumbered.	None
This is really about taking Corrective Action where a legal non-compliance issue is identified either internally or through enforcement action.	Available regulatory action information is not English. Use terminology that people can understand!	System to take Corrective and Preventive Action to fully address regulatory non-compliance.	2	Task group believes that suggested revision does not add any clarity to the requirement.	None
the country in which the Program Participant operates.					

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Delete this Performance Measure and existing Indicators	The language seems repetitive of PM 14.1 and the language of these two PM's could easily be combined for simplicity.	Move Indicators 14.2.1 and 14.2.2 under PM 14.1.	2	task group reviewed comment but believes it is important to maintain two separate performance measures: one requires a system to address compliance with social and environmental laws and another to require a policy demonstrating commitment to all social laws for the country in which they operate (US or Canada). However requirements of Performance Measure 15.1 have been revised.	See proposed language for Indicators 15.1.1, 15.1.4 and 15.1.5.
No comment					
Objective 14, Performance Measures 14.1 and 14.2 – There appears to be duplication with these two PMs. Both require program participants to "comply with applicable federal, state . . . . social laws." Since 14.2 is specific to social laws, it would seem reasonable to remove it from 14.1.			2	task group reviewed comment but believes it is important to maintain two separate performance measures: one requires a system to address compliance with social and environmental laws and another to require a policy demonstrating commitment to all social laws for the country in which they operate (US or Canada). However requirements of Performance Measure 15.1 have been revised.	See proposed language for Indicators 15.1.1, 15.1.4 and 15.1.5.
Sujet pouvant être couvert avec 14.1 (se conformer aux lois et règlements). Vérifier la possibilité de fusionner avec 14.1 dans un objectif de simplification.	none.	none.	2	task group reviewed comment but believes it is important to maintain two separate performance measures: one requires a system to address compliance with social and environmental laws and another to require a policy demonstrating commitment to all social laws for the country in which they operate (US or Canada). However requirements of Performance Measure 15.1 have been revised.	See proposed language for Indicators 15.1.1, 15.1.4 and 15.1.5.
discrimination and anti-harassment measures, workers' compensation, indigenous peoples' rights, workers' and communities' right to know, prevailing wages, workers'					
Combine PM 14.1 & 14.2 and move this Indicator under 14.1.	Repetition in PMs 14.1 and 14.2				

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Limiting the ability of Program participants to achieve compliance through a single policy seems arbitrary. A participant should be able to use a single or multiple policies to achieve compliance.	Clarification and increased efficiency for program participants.	Revise 14.2.1 as follows: "Written policy or policies demonstrating commitment to comply with social laws, such as those covering civil rights, equal employment opportunities, anti-discrimination and anti-harassment measures, workers' compensation, indigenous peoples' rights, workers' and communities' right to know, prevailing wages, workers' right to organize, and occupational health and safety".	2	Task group believes that use of the word "policy" does not preclude the use of one or more policies to meet the requirements of this Performance Measure.	None
Préciser que la politique écrite doit démontrer l'engagement à se conformer aux lois sociales. Toutefois, il n'est pas nécessaire d'énumérer dans la politique écrite, tous les exemples de sujets pouvant être abordés.	none.	none.			
core conventions.					
Any reference to the ILO Core Conventions needs to recognize that the conventions are for countries, not individual organizations, and organizations must follow the applicable laws, regulations, etc. of the countries in which they operate.	We believe the added language increases consistency between PM 14.2 and Indicator 14.2.2.	Revise 14.2.2 as follows: "Forestry enterprises will respect the rights of workers and labor representatives in a manner that encompasses the intent of the International Labor Organization (ILO) core conventions consistent with applicable national law, rights, regulations and administrative /judicial rules".	2	Task groups believes that he suggested revision does not bring additional clarity to the requirement.	None
Combine PM 14.1 & 14.2 and move this Indicator under 14.1.	Repetition in PMs 14.1 and 14.2		2	task group reviewed comment but believes it is important to maintain two separate performance measures: one requires a system to address compliance with social and environmental laws and another to require a policy demonstrating commitment to all social laws for the country in which they operate (US or Canada). However requirements of Performance Measure 15.1 have been revised.	See proposed language for Indicators 15.1.1, 15.1.4 and 15.1.5.

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Dans la version française, cet indicateur est considéré comme une mesure de performance (14.3)	none.	none.	3	This comment makes reference to PM 14.3 in the French version of the SFI 2010-2014 Standard which is Indicator 14.2.2 in the English SFI 2010-2014 standard.	None
Nobody knows how to interpret the intent of the ILO Core Conventions. We need to be more specific about what the requirement is here!			2	Regarding 15.2.2 , guidance for the interpretation of ILO Core Conventions can be found in SFI Program Section 6 Guidance, chapter 8 - ILO Core Conventions.	None
This Indicator requires compliance with the intent of the ILO Core Conventions, which have not all been ratified in the U.S. or Canada. It does not reference the ILO guidance in Section 9	While it may be acceptable to reference the ILO Core Convention compliance in terms of "intent' only, the potential legal issues involved justify changing this to compliance with the intent of the ILO Declaration on Fundamental Principles and Rights at Work to avoid confusion in interpretation.	Forestry enterprises will respect the rights of workers and labor representatives in a manner that encompasses the intent of the International Labor Organization's (ILO) Declaration on Fundamental Principles and Rights at Work.	2	Task groups believes that he suggested revision does not bring additional clarity to the requirement.	None
This is OK as long as it does not violate an individual's "right to work" without forced participation in a union or forced payment of union dues.			3	General editorial comment - no revised language proposed.	None
well worded. Do not change this.			3	General editorial comment.	None
Use this space to propose any removals or additions for Objective 14:					
Add new indicator regarding worker safety. Rationale: Worker safety is noticeably absent from the SFI Standard. Relative to Program Participant's social obligations, safety of employees and contractors comes first. As so, the SFI Standard would benefit from including an indicator related to worker safety. Proposal: Program Participants shall encourage safe work practices for employees through establishment of worker safety procedures, awareness training, or other related requirements, such as a. Safety manual; b. Regularly scheduled safety meetings; c. Procedure for employees to check-out and check-in; d. Procedure for emergency response; e. Procedure for sharing safety incidents; f. Requirements for use of personal protective equipment; or g. Third party safety inspections.			2	Task group believes that existing requirements of Objective 15 address the intent of the comment.	None

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Combine PM 14.1 and 14.2 and join Indicator lists under these.			2	task group reviewed comment but believes it is important to maintain two separate performance measures: one requires a system to address compliance with social and environmental laws and another to require a policy demonstrating commitment to all social laws for the country in which they operate (US or Canada). However requirements of Performance Measure 15.1 have been revised.	See proposed language for Indicators 15.1.1, 15.1.4 and 15.1.5.
Please consider dropping 14.1.3 Difficult to accomplish and satisfy auditors. Regulatory action information is not available for "good actors".			2	Task group believes access to regulatory action is useful for identifying issues regarding BMP implementation. This information can be used for updating logger training and communications with loggers.	None

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The additions to Objective 14 below fold in the requirements from Objectives 12 and 13 and would apply to all program participants for legal sourcing and social requirements, both for wood and fiber sources within and outside of North America. Add to 14.1 4. Process to assess the risk that Program Participant's fiber sourcing program could acquire material from illegal logging 5. Program to address any significant risk identified under 14.1.4. Create Objective 14.3, which picks up the requirements from Objective 13 14.3 Program Participants shall avoid controversial sources and encourage socially sound practices for fiber sourced from areas without effective social law. Indicators: 1. Process to assess the risk that the Program Participant's fiber sourcing could take place in countries without effective laws addressing the following: a. workers' health and safety; b. fair labor practices; c. indigenous peoples' rights; d. anti-discrimination and anti-harassment measures; e. prevailing wages; and f. workers' right to organize. 4. Program to address any significant risk identified under 14.1.4.			2	Task group has proposed language at Performance Measure 15.1 which addresses these comments.	See proposed language for Performance Measure 15.1, Indicators 15.1.4 and 15.1.5.
Objective 15. Forestry Research, Science, and Technology. To support forestry research, science, and technology, upon which sustainable forest management decisions are based.					

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	The SFI does not prohibit companies from using genetically modified trees and other species. The SFI Standard contains no prohibition on the use of genetically modified trees and other GMO species, for either research or commercial production. While an indicator calls for such usage to comply with applicable laws, this does not equate to a prohibition on using dangerous GMO trees. The US government, for example, is considering an industry request to legalize the commercial sale of half a billion genetically engineered eucalyptus seedlings for use across the Southern US, and typically approves such requests. Other GMO tree species are also currently allowed in smaller test plots. Relevant SFI provisions: Indicator 15.1.2.		2	Comment does not accurately describe the SFI policy or Standard requirements regarding forest tree biotechnology. Commercial deployment of trees derived from forest tree biotechnology is not permitted on SFI certified lands. The Task Group has revised the current Indicator addressing biotechnology research to require that research will adhere to international protocols ratified by either the United States or Canada depending on jurisdiction. SFI has also formalized its position in the SFI Inc. Policy on Forest Tree Biotechnology.	See proposed language for Indicator 16.1.2 and the SFI Inc. Policy on forest Biotechnology.
Recommend the title of objective be changed to the more broad term "Forest Research" rather than the more restrictive term Forestry.	This change will better reflect the intent of the Objective outlined in the performance measures.				
partners provide in-kind support or funding for forest research to improve forest health, productivity, and sustainable management of forest resources, and the					
Comment	Rationale for proposed change	Proposed new language			
At no time will the XXX support the use of genetically engineered trees for the use in reforestation within any of the XXX traditional territories. Any reference to genetically engineered tree must be removed from the SFI Standards.			2	Task group believes that current Objective title captures the scope of the objective requirements related to research and technology.	None
PM 15.1 Indicators: 1. Financial or in-kind support of research to address questions of relevance in the region of operations. The research shall include some of the following issues: a. forest health, productivity, and ecosystem functions; b. chemical efficiency, use rate and integrated pest management; c. water quality and/or effectiveness of best management practices including effectiveness of water quality and best management practices for protecting the quality, diversity and distributions of fish and wildlife habitats; d. wildlife management at stand and landscape levels; e. conservation of biological diversity; f. ecological impacts of bioenergy feedstock removals on productivity, wildlife habitat, water quality and other ecosystem functions; g. climate change research for both adaptation and mitigation; h. social issues; i. forest operations efficiencies and economics; j. energy efficiency; k. life cycle assessment; l. avoidance of illegal logging; and m. avoidance of controversial sources.					

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		n. reduction of catastrophic wildland fire	2	Task group has considered the comment and has incorporated into Indicator 16.1.1	See proposed language for Indicator 16.1.1.
	Research into water quantity, soil productivity issues and best management practices would also round out the research priorities listed.	1a) forest health, forest and soil productivity, and ecosystem functions 1c) water quality and quantity and/or effectiveness of best management practices including effectiveness of water quality and quantity and best management practices for protecting the quality, diversity and distributions of fish and wildlife habitats	2	Task group reviewed comment and believes that scope of Objective is broad enough to accommodate these issues without identifying them specifically in in the Objective title.	None
2. Research on genetically engineered trees via forest tree biotechnology shall adhere to all applicable federal, state, and provincial regulations and international protocols.					
Consider using some or all of the Responsible Use: Biotech Tree Principles.	These Principles were developed with a broad array of stakeholder input, are open, free, and available to use in part or whole in any way that would be useful to the SFI. The Principles are not a sustainable forest management system. They incorporate communication, outreach, and transparent management elements that might be helpful to the SFI as it undergoes this review process.	Any or all of the language, as-is or modified, in the Responsible Use: Biotech Tree Principles; available at: www.responsibleuse.org	2	Task group did discuss use of the Bio-use Tree Principles. SFI has summarized its current position regarding Forest Tree Biotechnology in its Forest Tree Bio-technology Policy approved in December 2013.	See December 2013 SFI Policy on Forest Tree Biotechnology.
I think it is wrong to require adherence to "all international protocols" for biotechnology.		Research on genetically engineered trees via forest tree biotechnology shall adhere to all applicable federal, state, and provincial regulations.	2	Task group concurs with comment and has revised language for Indicator 16.1.2 to require adherence with all international protocols that have been ratified by either US or Canada - depending on jurisdiction.	See proposed language for Indicator 16.1.2.
provincial or regional level, in the development or use of some of the following: a. regeneration assessments; b. growth and drain assessments; c. best management					
Comment	Rationale for proposed change	Proposed new language			
Even though the analyses listed (a-e) are examples, SFI should consider eliminating “regeneration assessments” from the list due to limited availability of such assessments.	Regional assessments of regeneration are difficult to find or fund due to the overwhelming success of reforestation across the country.	Delete 15.2.1(a)	2	the list of cooperative effort is not meant to be all inclusive so if regeneration assessments are not applicable in a given region then other options should be considered.	None

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There are five individual Indicators that require support of the efforts of the SICs. We really only need one Performance Measure and one Indicator, not five.	Combine all five Indicators that address support of the SICs into one. This is excessive duplication that adds bulk but no substance.		2	Task group decided to continue to identify SIC related indicators under the relevant topic (forest research, sustainable forestry programs, and climate change) and not group under one SIC Performance Measure.	None
partners broaden the awareness of climate change impacts on forests, wildlife and biological diversity.					
Drop the reference to SICs.			3	General editorial comment - no rationale given for this comment.	None
Climate change will have a dramatic effect on reforestation today and into the future. The XXX encourage the Program Participants to conduct scientific research into climate change so there is a better understanding of the effects, so better growth pattern modeling can be achieved and species of interest to the Métis rights-bearing communities maintained. The XXX is interested in being involved in both Climate Adaptation and Mitigation programs that are envisioned by forest companies.			3	General Editorial comment supportive of Program Participants monitoring developments in climate change and its impacts on conservation of biological diversity.	None
PM 15.3 Indicators: 1. Where available, monitor information generated from regional climate models on long-term forest health, productivity and economic viability.					
Monitoring information and being knowledgeable are not real requirements. So what? Either add substance or remove Climate Change from the Standard.			2	Task group decided to retain this indicator until and if a better indicator can be identified.	None
See comments in removals/additions comment box.			3	Not possible to determine which Indicator this comment is linked to.	None

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There seems to be an opportunity to combine indicators 1 & 2.	Clarification.	Reword current indicator as follows "Program participants monitor information on the potential impacts due to climate change on long-term forest health, productivity, and economic viability, wildlife, wildlife habitats and conservation of biological diversity."	2	Task group decided to keep as two separate indicators - one looking at regional climate models and one looking at impacts of climate change.	None
2. Program Participants are knowledgeable about climate change impacts on wildlife, wildlife habitats and conservation of biological diversity through international, national, regional or local programs.					
15.3.1 & 2 can be combined into one indicator.	there is a lack of credible, science-based climate models that demonstrate impacts on forest and wildlife issues. It would make more sense for certificate holders to be knowledgeable on models that exist and have the ability to determine how to utilized the information.	"Program participants are knowledgeable about climate change impacts through international, national or local programs which include some of the following: a.Wildlife b.Wildlife habitats c.Conservation of biological diversity d.Long-term forest health productivity e.Economic viability	2	Task group decided to keep as two separate indicators - one looking at regional climate models and one looking at impacts of climate change.	None
Change the word "knowledgeable" causes to many audit issues.	judgemental	Program participants have access to information regarding climate.....	2	Tasks group believe that having access to climate change models and information is not the same as having staff who monitor developments in climate change science. The latter requires that some staff be knowledgeable about developments.	None
Use this space to propose any removals or additions for Objective 15:					
The removal of Performance Measure 15.3.			3	General editorial comment - no rationale given for comment.	None
Eliminate 15.3.1 because it is now covered in Objective 15.3.2.			2	Task group disagrees - need for two separate indicators remains.	None
Objective 16. Training and Education. To improve the implementation of sustainable forestry practices through appropriate training and education programs.					
We support the comments submitted by the Minnesota Master Logger Certification Program on 8/6/13. Please reference and address those comments during the standard revision process.			3	General editorial comment supportive of the MN Master Logger Program comment submission.	None

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Striving to obtain the vast majority of raw materials from logging professionals who have completed training materials has become very difficult for some of our procurement operations in the Southeast.	SFI Implementation Committees widespread adoption of continuing educations requirements for the loggers to maintain their trained status, Logging associations not able to receive credit or funding to train loggers, price requirements for the logger's training programs, Loggers stressed financial survival, Forestry organizations reductions in professional headcount to teach, Feast and famine wood supply cycles that are testing the limits of contractual expectations between the wood buyers and loggers, and with the addition of pellet plants and biomass plants, which are most times subsidized, places a burden on the number and profitable of qualified loggers.	These circumstances are creating a dilemma on those SFI Participants who source the greatest majority of their fiber from uncertified lands. There needs to be an understanding in every SFI Implementation Committee, that recognized qualified logger association should be granted the right to offer logger training, and that training be recognized by the SFI Inc. Also, we believe the SFI Implementation Committees should do their best to have more reciprocating agreements with logger in other States. Also, the Forest Resources Association may be a very good place to house logger training.	2	This comment and the issues related to it have been under intial review by the Task Group and will be the subject of further discussion during the second review period.	
Objective wrongly implies that training alone can provide sustainable forestry, and it further implies wrongly that without training current forestry cannot be sustainable. Furthermore, objective fails to sufficiently stratify between participant employees, wood producers, or states having stringent forestry regulations. Objective poorly attempts to lump too many issues into a single metric, "training."	As written, objective 16 harmfully muddles participant employees with wood producers, and also with "contractors" (undefined in STD). Furthermore, the training standard patently discriminates against states and their professional logger programs that already have compliance with stringent forestry regulations, by requiring redundant "training" additionally-- training added beyond an already rigorous regulatory compliance platform. This SFI STD discrimination against stringent regulatory states penalizes the state logger training program in those states, as well as those SFI participants, with a training standard that is a false surrogate for long-standing regulatory compliance that's been occurring for decades in such states.	This objective would be more clear if stratified into two issues: 1/participant employees; and 2/wood producers. The use of the "contractor" term is undefined in the SFI STD. Then, the objective 16 should also offer separate indicators for each of the 2/ above to address: a/states with stringent forestry regulations; and b/states lacking stringent forestry regulations. "Obj. 16. Training, Education and Forestry Compliance. To continuously advance the implementation of current sustainable forestry through education, training, and successfully compliance with forestry regulations."	2	Task group believes that the existing requirements at 16.1 (for program participants) and 16.2 (contractors) are clear. Regarding the need for a definition for the term "contractor" this has been examined in prior standard revisions and the decision made not to define contractor due to he many different kinds of contractors (site prep, herbicide application, road builder, gravel hauler, bridge builder, management contractor, etc). Both employees and contractors contractor must have whatever knowledge and training is necessary to ensure their work (if it impacts forest management or procurement) does not compromise a Program Participants SFI program for meeting standard requirements.	None
under the SFI 2010-2014 Standard.					
Comment	Rationale for proposed change	Proposed new language			

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See above recommendation. separate measure for participant employees; separate measure for wood producers; drop "contractor" or other undefined terms.	See above.	I would be glad to participate in revision of Objective 16. and its PMs. I am reluctant to provide detailed revisions at this time, because our comments provided a three junctures during the 2010-14 SFI STD revision process in 2008-2009 were all ignored. If you are serious about addressing our concerns, please contact me for further involvement.	2	Task group believes that the existing requirements at 16.1 (for program participants and contractors) and 16.2 (wood producers) are clear. Regarding the need for a definition for the term "contractor" this has been examined in prior standard revisions and the decision made not to define contractor due to he many different kinds of contractors (site prep, herbicide application, road builder, gravel hauler, bridge builder, management contractor, etc). Both employees and contractors must have whatever knowledge and training is necessary to ensure their work (if it impacts forest management or procurement) does not compromise a Program Participants SFI program for meeting standard requirements. Regarding enhancement of training requirements, the Task Group has proposed language in Indicators 17.1.5 and 17.2.1.	See proposed language for Indicators 17.1.5 and 17.2.1.
SFI does not require and train for an understanding of the Aboriginal Way of Life, Cultural sensitivities and Spirituality. Clear guidelines and training materials must be developed and implemented into the SFI Standards. Staff, Employees and Contractors must know the differences of being a Stakeholder versus being a Rights Holder (rights-bearing Aboriginal community). Even though employees and contractors have received the necessary training; it does not confirm that they have knowledge of the training. By means of verification, testing of established policy and procedures should confirm sufficient knowledge exchange. Testing will demonstrate there has been a knowledge exchange, and workers and contractors are competent to carry out the tasks asked of them. With testing, suitable records should also be maintained as part of a means of verification.			2	Training regarding awareness of Indigenous peoples values can be addressed by the individual program participant however SFI task group recognizes that this could feature be made more prominent.	See proposed language for Objective 8

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Contractors is not defined in the SFI. Who are these people?	Contractors are those that the company's have a contract with to perform some form of forestry work that could impact the environment. We need to specify what kinds of contractors need to be trained. We should limit this to logging and site preparation contractors	..training of internal personnel and logging and site preparation contractors so that they...	2	Regarding the need for a definition for the term "contractor" this has been examined in prior standard revisions and the decision made not to define contractor due to he many different kinds of contractors (site prep, herbicide application, road builder, gravel hauler, bridge builder, management contractor, etc). A contractor can be anyone providing services in support of forest management. Contractors must have whatever knowledge and training is necessary to ensure their work (if it impacts forest management or procurement) does not compromise a Program Participants SFI program for meeting standard requirements. Regarding enhancement of training requirements, the Task Group has proposed language in Indicators 17.1.5 and 17.2.1.	See proposed language for Indicators 17.1.5 and 17.2.1.
PM 16.1 Indicator: 2. Assignment and understanding of roles and responsibilities for achieving SFI 2010-2014 Standard objectives.					
Comment	Rationale for proposed change	Proposed new language			
This indicator is intended to apply to Program Participant employees (versus 16.1.4 which applies to contractors). As such, it would benefit from clarification.	The indicator is currently not explicit relative to its applicability to Program Participant employees versus contractors.	Assignment and understanding of Program Participant employee's roles and responsibilities for achieving SFI Standard objectives.	2	This indicator is inclusive of both program participants employees and contractors.	None

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The standard is in places too SFI standard-centric. For example, under objective 16 (training & education) the performance measure says that certificate holders need to require training "to fulfill . . . responsibilities under the SFI 2010-2014 Standard' and indicator 2 says "assignment and understanding of roles and responsibilities for achieving the 2010-2014 Standard objectives." Another example is under Objective 20 where the performance measure is to establish a management review system to examine findings and progress in "implementing the SFI Standard." The DNR's goal should not be achieve or implement the SFI standard. Our goal should be to implement our own policies and programs. The policies and programs are evaluated against the standard, but our goal shouldn't be the standard.			3	General editorial comment. Purpose of the SFI program is voluntary certification of forest management and fiber procurement practices; not to direct government agency policies or goals.	None
See above. This indicator is counterproductive, and likely violates arms length independent contractor relationship between purchaser and contractor. It only applies to participant employees.	See above.	I would be glad to participate in revision of Objective 16. and its PMs. I am reluctant to provide detailed revisions at this time, because our comments provided a three junctures during the 2010-14 SFI STD revision process in 2008-2009 were all ignored. If you are serious about addressing our concerns, please contact me for further involvement..	2	This indicator is inclusive of both program participants employees and contractors.	None
PM 16.1 Indicator: 4. Contractor education and training sufficient to their roles and responsibilities.					
Limit Contractor training to those contractors that need to be competent in BMPS and forest practices.		Logging and site preparation contractor education and training sufficient...	2	Program participants determine the scope of the contractor training - nothing to suggest that this practice is not working.	None

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See above. This indicator is counterproductive, and likely violates arms length independent contractor relationship between purchaser and contractor. It only applies to participant employees. Furthermore, PM 16.1 is redundant and somewhat contradicts PM 16.2. Which is it; or is the professional logger program supposed to be the surrogate to green-stamp a "CLP" or "QLP" "person" as only sustainable after completion? This is rather irrational and condescending to imply that only a so-called "SFI-trained logger" is sustainable. As written, PM 16.1 and 16.2 prescribe a naïve, schizophrenic, and misleading basis for professional wood producer training. please do not discriminate against the contract sector via the implication that sustainable forestry is derived through so-called "logger training." Even the schizophrenic conglomeration of terms used to refer to these contractors is indicative of the muddled and misleading direction in the Standard (wood producer, contractor, CLP, QLP, person, QRP, secondary producer, logger, logging crew, individual, to name a few).	See above.	See above.	3	Task group consensus and feedback from certification bodies is that historically there has not been an issue with distinguishing between training employees and contractors on the requirements of the SFI standard. Also, the use of CLPs, QLPs, & is just one part of implementation the SFI program - the use of "trained loggers" in insolation does not imply sustainability. Finally, defining the training requirements for CLPS/QLP/QRPs is the role of the SICs though this role is often shared with State loggers associations.	None
PM 16.1 Indicator: 5. Forestry enterprises shall have a program for the use of certified logging professionals (where available) and qualified logging professionals.					
Very few states (and none in the South) have "certified logging professional" programs. Auditors use this as a trick question as most foresters do not know the difference between “certified” and “qualified”. SFI should stress the required use of qualified logging professionals (master logger, Professional Logging Manager, etc.) supported by the SICs and then recognize certified logging professional programs.	Reordering the indicator to put “qualified logging professionals” first will appropriately emphasize these types of trained professionals. As it is written, certified logging professionals appears to be the norm despite the parenthetical “where available” language.	Forestry enterprises shall have a program for the use qualified logging professionals. Such programs shall include provisions for use of certified logging professionals, where available.	2	Task group understands that few states have Certified Logging Professional training programs which have been recognized as such by their SIC. Where CLP programs exist Program Participants are to have a program for the use of CLPs.	None
agencies or others in the forestry community to foster improvement in the professionalism of wood producers.					
Don't need to list examples of SICs, associations, agencies and others. Lets just say work individually and/or collectively.		PPs shall work individually and/or collectively to foster improvement...	2	Task group believes that proposed language does not enhance the existing requirement.	None

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See above comments for PM 16.1 and Objective 16. Obj. 16 and its performance measures should be reorganized, rewritten, and re-tempered to distinguish between participants, wood producers, and those operating in a state with a stringent forest regulatory atmosphere. SFI cannot rationally have a one-size-fits-all logger training standard for state forest management regulatory sectors as different as Oregon and say Alabama. The laundry list of PM 16.2 indicators a. to j. (below) manifests how nonsensical the "one-size" tactic is. Here in Oregon, items a. to j. are either state statutory, administrative, or standard contract procedure for SFI participants. The SFI Standard's failure to recognize those state logger professional programs that operate in a stringent forestry regulatory climate is a patent failure of the 2010-14 SFI STD.	See comment box.	I would be glad to participate in revision of Objective 16. and its PMs. I am reluctant to provide detailed revisions at this time, because our comments provided a three junctures during the 2010-14 SFI STD revision process in 2008-2009 were all ignored. If you are serious about addressing our concerns, please contact me for further involvement.	2	Task group understands logger training programs will differ between jurisdictions. The standard does not advocate a one size fits all approach to logger training but does allow SICs to develop logger training programs are that reflective of state or regional BMPs and guidelines. The standards needs to allow for these differences between jurisdictions without implementing a two tired approach to logger training.	
Cette mesure de performance contribue à atteindre l'objectif 16. Toutefois, les indicateurs associés vont peut-être trop loin en regard des capacités de fonctionnement des comités d'implantation de la norme SFI. Les indicateurs seraient à ré-évaluer.	nones.	none.	2	Comment is concerned with the ability of SICs to achieve the requirements of the Performance Measure. However comment does not offer any new language.	None
PM 16.2 Indicators:1. Participation in or support of SFI Implementation Committees to establish criteria and identify delivery mechanisms for wood producers' training courses that address: a. awareness of sustainable forestry principles and the SFI program; b. best management practices, including streamside management and road construction, maintenance and retirement; c. reforestation, invasive exotic plants and animals, forest resource conservation, aesthetics, and special sites; d. awareness of responsibilities under the U.S. Endangered Species Act, the Canadian Species at Risk Act, and other measures to protect wildlife habitat (e.g. Forests with Exceptional Conservation Value); e. logging safety; f. U.S. Occupational Safety and Health Administration (OSHA) and Canadian Centre for Occupational Health and Safety (COHS) regulations, wage and hour rules, and other provincial, state and local employment laws; g. transportation issues; h. business management; i. public policy and outreach; and j. awareness of emerging technologies.					

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The purpose of the "wood producer training" more correctly should be continuing education, continuous improvement, and innovation--rather than the wrong implicit purpose in the current OBJ 16 and PMs (of "training" to be sustainable). The current standard is unproductive and wrongheaded. See above under PM 16.1 and Objective 16. This indicator is counterproductive, and it fails to accommodate reasonable and meaningful differences for states having stringent forestry regulatory programs. Furthermore, PM 16.2 is redundant and somewhat contradicts PM 16. Which is it; or is the professional logger program supposed to be the surrogate to green-stamp a "CLP" or "QLP" "person" as only sustainable after completion? This is rather irrational and condescending to imply that only a so-called "SFI-trained logger" is sustainable. As written, PM 16.1 and 16.2 prescribe a naïve, schizophrenic, and misleading basis for professional wood producer training. Please do not discriminate against the contract sector via the implication that sustainable forestry is derived through so-called "logger training." Even the schizophrenic conglomeration of terms used to refer to these contractors is indicative of the muddled and misleading direction in the SFI Standard (wood producer, contractor, CLP, QLP, person, QRP, secondary producer, logger, logging crew, individual, to name a few). For states having a stringent and comprehensive forestry regulatory program, the state SIC should be the entity defining contents of its unique professional logger program. The one-size-fits-all laundry list of what you think it takes to be a so-called "trained logger" is nothing more than bureaucratic redundancy for states having a stringent and comprehensive forest regulatory program. For example, item f. refers to "US OSHA." In Oregon, applicable forest activity safety is regulated under far more comprehensive Oregon-OSHA regulations--not US-OSHA. Furthermore, the Objective 16 and its PMs demand that the "person", "individual" is the "trained" "certified" logging entity. Again, this dictate is counter-productive, illogical, and unhelpful for every state. This dictate discriminates against established company-based forest contractor culture that has performed well in Oregon for decades. It is naïve for SFI to presume that its "person"-based STD should dictate a program to promote or encourage education and incentivize continuous improvement--in a state forestry sector where contract companies are the focal point(not the "person"). Please		I would be glad to participate in revision of Objective 16. and its PMs. I am reluctant to provide detailed revisions at this time, because our comments provided a three junctures during the 2010-14 SFI STD revision process in 2008-2009 were all ignored. If you are serious about addressing our concerns, please contact me for further involvement.	2	Task group consensus and feedback from certification bodies is that historically there has not been an issue with distinguishing between training employees and contractors on the requirements of the SFI standard. Also, the use of CLPs, QLPs, & is just one part of implementation the SFI program - the use of "trained loggers" in insolation does not imply sustainability. Finally, defining the training requirements for CLPS/QLP/QRPs is the role of the SICs though this role is often shared with State loggers associations.	None
La measure de performance contribute à attainder l'objectif 16. Toutefois, les indicateurs associés vont peut-être trop loin en regard des capacités de fonctionnement des comités d'implantation de la norme SFI. Les indicateurs seraient à ré-évaluer.	none.	none.			
Combine all Indicators that deal with the SICs.			3	General Editorial Comment	None

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2. Participation in or support of SFI Implementation Committees to establish criteria for recognition of logger certification programs, where they exist, that include: a. completion of SFI Implementation Committee recognized logger training programs and meeting continuing education requirements of the training program; b. independent in-the-forest verification of conformance with the logger certification program standards; c. compliance with all applicable laws and regulations including responsibilities under the U.S. Endangered Species Act, the Canadian Species at Risk Act and other measures to protect wildlife habitat; d. use of best management practices to protect water quality; e. logging safety; f. compliance with acceptable silviculture and utilization standards; g. aesthetic management techniques employed where applicable; and h. adherence to a management or harvest plan that is site specific and agreed to by the forest landowner.					

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SFI should further define the criteria to assess logger certification programs against.	Doing so will provide a base of minimum requirements to ensure the credibility of logger certification programs from state to state and the credibility of SFI. Not all logger certification programs are created equal and some are far less credible than others.	SFI should further define the criteria to assess logger certification programs against, To do so, we propose the addition the following: 1.Logger Certification Standard shall be consistent with SFI standard and state or provincial BMPs. 2.Logger Certification 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	2	While much of the comment is laudable in practice aspects of it go beyond logger certification requirements e.g. see 2. e. (i), (ii) and (iii). Those states that have SIC approved Certified Logging Professional training program have invested considerable time and effort into developing these programs to meet their states requirements. The task group believes that the responsibility for determining requirements for Certified Logging Professional program should rest with the recognized logging associations working in tandem with the respective SICs using the core parameters laid down in 17.2.1 and 17.2.3.	None

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See above comments. Word-smithing here cannot complete the needed reforms. Could it be written more simply and clearly? Yes. In particular, item 16.2.2.b.-- since when did "independent third party in-forest verification" become the litmus test for each and every practice that occurs. Why would the SFI write such an indicator into the wood producer continuing education program? This is illogical... and costly. Are we supposed to hire an auditor to come attend every seminar in Oregon to be sure every participant attends, learns, and is happy? Again, this is unhelpful redundancy and costly bureaucracy. The laundry lists may look great on paper in a glossy manual on your Washington, DC bookshelves, but the practicality is not cost-effective in practice in some 30+ SFI states and provinces. The last time I checked, SFI's goal was not to create "toll road commission" bureaucracies--which provide no value-added--in each state SIC and state professional logger program. Consider the terminology "professional logger program," rather than "logger training--when referring to this aspect of Objective 16. I'm curious why the SFI Standard did not refer to the participant's many awareness, improvement, research and forestry programs as "participant training"? Would it not be appropriate for the participants (yes, participant "individuals" and "persons") to be "trained" in the long lists of important "courses" too?		I would be glad to participate in revision of Objective 16. and its PMs. I am reluctant to provide detailed revisions at this time, because our comments provided a three junctures during the 2010-14 SFI STD revision process in 2008-2009 were all ignored. If you are serious about addressing our concerns, please contact me for further involvement.	2	The comment seems to imply that "in-woods verification" is a requirement for a QLP program which is not the case - "in woods verification" is only a requirement for Certified Logging Programs.	
Logger certification is vague and should be removed from the standard. Qualified or trained logging professional is adequate.			2	Task group believe that states with functioning CLP should be recognized and supported and therefore disagrees with the comment.	None
La measure de performance contribute à atteindre l'objectif 16. Toutefois, les indicateurs associés vont peut-être trop loin en regard des capacités de fonctionnement des comités d'implantation de la norme SFI. Les indicateurs seraient à ré-évaluer.	none.	none.	2	Comment is concerned with the ability of SICs to achieve the requirements of the Performance Measure. However comment does not offer any new language.	None
Combine all Indicators that deal with the SICs.			3	General Editorial Comment	None
Use this space to propose any removals or additions for Objective 16:					

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I would be glad to participate in revision of Objective 16. and its PMs. I am reluctant to provide detailed revisions at this time, because our comments provided a three junctures during the 2010-14 SFI STD revision process (2008-2009 comment periods and workshop attended) were all ignored. If you are serious about addressing our concerns, please contact me for further involvement.			3	General editorial comment	None
Performance Measure 17.1. Program Participants shall support and promote efforts by consulting foresters, state, provincial and federal agencies, state or local groups, professional societies, conservation organizations, indigenous peoples and governments, community groups, sporting organizations, labor, universities, extension agencies, the American Tree Farm System(R) and/or other landowner cooperative programs to apply principles of sustainable forest management.					

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	The SFI does not include sufficient independent standards addressing indigenous rights and local community impacts. The Standard does not consistently require that managers of certified forests consult with local communities to identify and avoid impacts on values and resources of interest to the community. Instead, Objective 17 of the Standard and its indicators focus on education of other forest landowners and other entities, and establishment of state and provincial level forums to address stakeholder concerns. The Standard also does not require that indigenous peoples' outstanding rights to forest resources and governance of forestlands in Canada and the US be respected, including through the concept of "free prior informed consent." Instead, the Standard merely requires that "program participants with forest management responsibilities on public lands shall confer with affected indigenous peoples" and "…to enable program participants to identify and protect spiritually, historically, or culturally important sites" and achieve other goals. However, the Standard does not require that forest management actually protect sites and resources important to indigenous people. Nor is such language helpful in cases where indigenous people have reserved rights in the context of non-public lands. Relevant SFI provisions: Objective 17 Community Involvement and its indicators, Performance Measure 18.2 and Indicator 18.2.1.		2	Comments do not accurately describe the Standard requirements for Community Involvement and Landowner Outreach and addressing Indigenous Rights. The comment ignore the existence and role of the 35 SFI Implementation Committees across the United States and Canada. Regarding the comments about Indigenous rights the current SFI standard has this requirement. The Task Group has proposed a new Objective 8 which will group all requirements for addressing Indigenous Peoples rights. This Objective has provisions for public and private forest lands.	See proposed Objective 8 - Recognize and Respect Indigenous Peoples' Rights.

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AFF supports the continued inclusion of this important indicator as means for involving communities at the local level. Specifically, inclusion of the American Tree Farm System is critical to engagement of family and small-scale landowners, as well as the local forestry community. ATFS draws on more than 70 years of experience is working with family woodlands and continues to serve as a central means for engaging family woodland owners utilizing a suite of tools and resources to promote sustainable forest management. In addition, Certified Tree Farms are a principle source of sustainable, local, certified fiber. In addition, ATFS also serves as a convening organization, bringing together a range of interests at the local, state and national level with involvement in the sustainable management of family woodlands. These include forest products and biomass companies, forest science and academia, federal and state agencies, forest and natural resource managers, landowner groups and conservation organizations. Thus, recognition and support of ATFS and State Tree Farms Programs serves to expand the practice of sustainable management on the ground and via local networks.			3	Task group appreciates AFF support for this Performance Measure.	None
The word “shall” implies there may not be a need to employ. (under contract “shall” indicates a duty, in the same way “must” does) The appropriate word to be used is “must” which in turn ensure compliance. The XXX is encouraged to read under Indicator 1 Support, including financial, for efforts of SFI Implementation Committees. The XXX must have full and meaningful representation on all sustainable forest planning teams and the financial support of the Program Participant.			3	The SFI standard incorporates ISO (International Organization for Standardization) preferred language, an example of which is the use of the word “shall”. "Shall" indicates that a task must be completed, that is is not optional.	None
PM 17.1 Indicators:					
1. Support, including financial, for efforts of SFI Implementation Committees.					

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Support for SICs should not be specified as financial.	The SFI SIC white paper addresses when financial support for SICs is required.	1. Support for efforts of SFI Implementation Committees.	2	Task group disagrees with the comment. SIC governance document addresses may items regarding the roles of SICs and the standard must be supportive of these roles.	None
2. Support for the development of educational materials for use with forest landowners (e.g. information packets, websites, newsletters, workshops, tours, etc.).					
We support the continued inclusion of this important indicator as means for involving communities at the local level.	Inclusion of the American Tree Farm System is critical to engagement of family and small-scale landowners, as well as the local forestry community.	Maintain the specific reference to the American Tree Farm System in Performance Measure 17.1.	3	supportive of keeping indicator. Task Group has developed revised requirements related to education and outreach to landowners.	See proposed language for Indicator 18.1.2.
Moving Objective 8 landowner outreach requirements to 17.1.2.	Since landowner outreach is already required in 17.1.2 for all program participants, it is not necessary to repeat it in Objective 8.	2 . Support for the development and distribution of educational materials for use with forest landowners (e.g. information packets, websites, newsletters, workshops, tours, support for grants/financial support at local level, etc.) which may include the following: a. best management practices; b. reforestation and afforestation; c. visual quality management; d. conservation of critical wildlife habitat elements, biodiversity, threatened and endangered species, and Forests with Exceptional Conservation Value; e. management of harvest residue (e.g. slash, limbs, tops) considers economic, social, environmental factors (e.g. organic and nutrient value to future forests) and other utilization needs; f. control of invasive exotic plants and animals; and g. characteristics of special sites. h. certification programs	2	Task Group has reviewed comment and incorporated its suggestion.	See proposed language for Objective 18 and PM 18.1.2

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17.1.2 and 17.1.3 are the same requirement. Both deal with education materials for landowners. We only need one of these. Take your pick.			2	Task group has revised requirements for 18.1.2 and removed 18.1.3.	See proposed language for Objective 18 and PM 18.1.2
3. Support for the development of regional, state or provincial information materials that provide forest landowners with practical approaches for addressing special sites and biological diversity issues, such as invasive exotic plants and animals, specific wildlife habitat, Forests with Exceptional Conservation Value, and threatened and endangered species.					
See comments in additions/removals comment box.			3	Not possible link comment to a standard requirement.	None
Combine this indicator with the one above.			2	Task group concurs with comment and has combined into one Indicator.	See proposed language for 18.1.2
17.1.2 & 3 could be interpreted as redundant. Generally speaking, the participant could provide similar evidence for both.	Combining these two indicators allows the participant to provide necessary evidence one time versus unnecessary duplication.	Support for the development of regional, state or provincial educational materials that provide forest landowners with practical approaches for addressing special sites and biological diversity issues, such as invasive exotic plants and animals, specific wildlife habitat, Forests with Exceptional Conservation Value, and threatened and endangered species (e.g. information packets, websites, newsletters, workshops, tours, etc.).	2	Task group concurs with comment and has combined into one Indicator.	See proposed language for 18.1.2
4. Participation in efforts to support or promote conservation of managed forests through voluntary market- based incentive programs such as current-use taxation programs, Forest Legacy Program (The Forest Legacy Program, a voluntary U.S. government program in partnership with the states, supports state efforts to protect environmentally sensitive forest lands that are privately owned) or conservation easements.					
The intent and scope of the requirement for "Participation in efforts to support or promote conservation of managed forests through voluntary market-based incentive programs such as current-use taxation programs, Forest Legacy Programs or conservation easements." is difficult to interpret.	This Indicator does not seem to be aligned with the Performance Measure, and seems to have a very narrow focus – "voluntary, market-based incentive programs".	Unknown. Re-write this Indicator using terminology that better explains its purpose and broadens what is acceptable to make conformance more feasible and understandable.			
5. Program Participants are knowledgeable about credible regional conservation planning and priority- setting efforts that include a broad range of stakeholders and have a program to take into account the results of these efforts in planning.					
See comments in additions/removals comment box.			3	Not possible to link comment to a standard requirement.	None

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Nobody knows what this means.		PPs are knowledgeable and take appropriate action to implement management measures dealing with the findings of conservation planning and priority setting efforts.	2	Task group believe current language for this requirement addresses comment.	None
Consider changing the word "knowledgeable"	judgemental	Program participants have access to information regarding credible.....	2	Task group believe that use of the term "knowledgeable" is appropriate. Having access to information is not the same as being knowledgeable of the information	None
Add requirement for engaging the conservation community and/or interested parties when considering regional conservation planning efforts.	The indicator currently requires Program Participants to be "knowledgeable about credible regional conservation planning and priority-setting efforts…", but doesn't require engaging the conservation community that is generally engaged in setting the priorities. Addition requirements to collaborate with the conservation community may strengthen this indicator.	Program Participants are knowledgeable about credible regional conservation planning and priority-setting efforts that include a broad range of stakeholders and have a program to take into account the results of these efforts in planning. Such programs should encourage collaboration with conservation, recreation or community groups.	2	Task Group believes that use of the phrase "broad range of stakeholders" is inclusive of all parties and therefore the need to high-light the conservation community is redundant.	None
Performance Measure 17.2. Program Participants shall support and promote, at the state, provincial or other appropriate levels, mechanisms for public outreach, education and involvement related to sustainable forest management.					
support for joint planning across ownership boundaries that reduce the risk to landowners and to the natural resources	nothing addresses the opportunity for communities and multiple landowners to work jointly on risk reduction, much of which requires a larger landscape than a single owner.	(insert between 3 and 4) new # 4 Support for the development of community wildfire protection plans and similar planning process that provide forest landowners with risk reduction methods from wildfire by addressing negative impacts from forest health issues (e.g. overstocking, bug outbreaks, drought and diseases etc.)	2	Task group concurs with suggestion to address wildfire risk in the context of land owner outreach.	See proposed language at 18.1.2
PM 17.2 Indicator:					

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1. Periodic educational opportunities promoting sustainable forestry, such as a. field tours, seminars, websites, webinars or workshops; b. educational trips; c. self-guided forest management trails; d. publication of articles, educational pamphlets or newsletters; or e. support for state, provincial, and local forestry organizations and soil and water conservation districts.					
Consider making Indicator 17.2.1 an indicator of Performance Measure 17.1	Performance Measure 17.2 and Indicator 17.2.1 are redundant with the intent of 17.1.	Delete PM 17.2 and create new indictor under 17.1 (see below)	2	Task group believe that retaining these two indicators should remain as separate indicators. However, indicator 18.1.2 has been revised.	See proposed language for Indicator 18.1.2
consulting foresters, employees, unions, the public or other Program Participants regarding practices that appear inconsistent with the SFI Standard principles and					
Comment	Rationale for proposed change	Proposed new language			
It is discouraging that Aboriginal Peoples have no avenue to bring their complaints forward in the same manner as others. In fact, there is no recognition in the performance measure whatsoever. The standard must be to change to recognize, and to provide the same level of opportunity.			2	Task group has developed a separate Objective addressing Indigenous Peoples rights (Objective 8 - Recognize and Respect Indigenous Peoples' Rights). Moreover, nothing in PM 18.3 precludes Indigenous Peoples from reporting an inconsistent practices.	See proposed language for Objective 8.
PM 17.3 Indicators:					
2. Process to receive and respond to public inquiries. SFI Implementation Committees shall submit data annually to SFI Inc. regarding concerns received and responses.					
This is a requirement for the SICs, not program participants. It doesn't belong here. Remove to a section addressing requirements for SICs.			2	Task group disagrees - requirement is for Program Participants to have a process in the event they are contacted regarding an inconsistent practice.	None
Use this space to propose any removals or additions for Objective 17:					
Remove 17.1.3 because it is already covered in proposed change to 17.1.2.d & f. Remove Objective 17.1.5 because it is now moved to Objective 11, Promote Conservation of Biological Diversity.			2	Indicator 18.1.2 has been revised incorporate comment regarding 17.1.3. However, Indicator for requirement to be knowledgeable about regional conservation planning and priority setting efforts has been retained and modified to include the planning and priority setting efforts of Indigenous Peoples.	See proposed language for Indicators 18.1.2 and 18.1.4.

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Add a new Indicator to 17.1 that reads: Program Participants shall support and promote at the state, provincial or other appropriate levels, mechanisms for public outreach, education, and involvement related to sustainable forest management, such as a. field tours, seminars, websites, webinars or workshops; b. educational trips; c. self-guided forest management tours; d. publication of articles, educational pamphlets or newsletters; or e. support for state, provincial, and local forestry organizations and soil and water conservation districts.			2	Task group has chosen to keep the indicator related to mechanisms for public outreach separate from the indicator addressing support for education and education of forestland owners.	See proposed language for 18.1.2.
Objective 18: Public Land Management Responsibilities. To promote and implement sustainable forest management on public lands.					
This is a Module for Canadian companies. Remove from the Standard to a Module for Public Land Managers in Canada.			2	This objective applies to all SFI program participants operating on public lands e.g. county, state and federal lands. Is not restricted to just SFI certification of Canadian public lands.	None

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	The SFI standards fail to require significantly more conservation-oriented management of publicly owned forests, including in the US. Under the SFI, public forests may be managed much as if they were private timber company forests. In the US, the citizens who own public forests typically expect their forests to be managed for broad public benefit, including through the establishment of areas where the management focus is on values other than commercial timber production, inclusion of the public in management planning, greater transparency, etc. However, the SFI Standard does not require public forests to be managed any differently than private commercial forests. The SFI Standard's only special requirements pertaining to public forests is for SFI certified entities to themselves participate in public land management planning, and for stakeholder consultation, including with indigenous peoples. Relevant SFI provisions: Indicators 18.1.1, 18.1.2, 18.2.1, and 18.2.2.		2	Comment completely ignores the fact that all SFI program participants operating on public forest land must adhere to legislated county, state, provincial or federal agency public involvement requirements. These public agencies also have requirements for transparency in the forest management planning process and recognition of all manner of forest uses in the planning process.	None

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	The SFI does not include sufficient independent standards addressing indigenous rights and local community impacts. The Standard does not consistently require that managers of certified forests consult with local communities to identify and avoid impacts on values and resources of interest to the community. Instead, Objective 17 of the Standard and its indicators focus on education of other forest landowners and other entities, and establishment of state and provincial level forums to address stakeholder concerns. The Standard also does not require that indigenous peoples' outstanding rights to forest resources and governance of forestlands in Canada and the US be respected, including through the concept of "free prior informed consent." Instead, the Standard merely requires that "program participants with forest management responsibilities on public lands shall confer with affected indigenous peoples" and "…to enable program participants to identify and protect spiritually, historically, or culturally important sites" and achieve other goals. However, the Standard does not require that forest management actually protect sites and resources important to indigenous people. Nor is such language helpful in cases where indigenous people have reserved rights in the context of non-public lands. Relevant SFI provisions: Objective 17 Community Involvement and its indicators, Performance Measure 18.2 and Indicator 18.2.1.		2	Comments do not accurately describe the Standard requirements for Community Involvement and Landowner Outreach and addressing Indigenous Rights. The comment ignore the existence and role of the 35 SFI Implementation Committees across the United States and Canada. Regarding the comments about Indigenous rights the current SFI standard has this requirement. The Task Group has proposed a new Objective 8 which will group all requirements for addressing Indigenous Peoples rights. This Objective has provisions for public and private forest lands.	See proposed Objective 8 - Recognize and Respect Indigenous Peoples' Rights.

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On public participation, the vision is quite reductionist and focuses mainly on having program participant informing/educating the public and taking part in public planning and participation process for public land. It might be appropriate for the US context where the State is in charge of public participation but in Canada where many provinces have delegated this responsibility, to the program participant it is odd to have no indicators to monitor how they do public participation and how they address public concerns raised on their management of public lands. How would anyone know that the participation did yield some results?			2	The fact that some Canadian provinces have devolved the responsibility for developing public land planning and management processes to individual program participants does not change the requirements of the Objective. These process have to conform to government regulations and guidelines and their conformance is verified by the relevant agencies and certification auditors.	None
Performance Measure 18.1. Program Participants with forest management responsibilities on public lands shall participate in the development of public land planning and management processes.					
An expanded? version of PM 18.1 contains a sentence as follows: "The Forest Legacy Program, a voluntary U.S. government program in partnership with the states, supports state efforts to protect environmentally sensitive forest lands that are privately owned" This language should be deleted.	This language seems to single out only one program while there may be a number of examples to list, e.g. National Forest Planning, Outdoor Recreation planning, other State programs, etc.		2	Reference to Forest Legacy Program is to serve as an example. Program Participants can support or promote other voluntary market based incentive programs of their choice.	None
Forest Management Planning requires input from all levels of the local Aboriginal communities (Métis and First Nations) with direct interest to the forest. Rights-bearing XXX Métis communities must have the opportunity for direct involvement in forest management planning. The Participant must provide financial capacity and must demonstrate they have entered into signed agreements with the XXX.			2	Certification to the SFI standard is a voluntary process and therefore separate from any government to government discussion undertaken between Indigenous Peoples and provincial or federal government. The SFI program has developed a new Objective addressing Indigenous Peoples rights (Objective 8 - Recognize and Respect Indigenous Peoples' Rights).	See proposed language for Objective 8.
PM 18.1 Indicators:					
Performance Measure 18.2. Program Participants with forest management responsibilities on public lands shall confer with affected indigenous peoples.					

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Program Participants must have a policy that deals with Aboriginal Peoples (Metis and First Nation) and must reflect the statements made in the indicators. Program Participants must have improved indicators demonstrating that the Program Participant have written agreements with the Aboriginal Communities (Métis and First Nations) indicating they have delegated control through full disclosure of information, with free and informed consent. Indicators must be extended to indicate the magnitude of Constitutional Rights vs. simply non-compliance of standards. Company policy on Aboriginal (First Nations and Métis) engagement must reflect these means of verification. Further any agreement must in turn contain these conditions: • The Program Participant keeps abreast of and is able to demonstrate a good working knowledge of the Aboriginal communities, their legal and customary rights and their interests related to forest lands within the forest management planning area. • The program Participant participates in and/or supports the efforts of the affected Aboriginal communities to develop their capacity to enable them to participate in all aspects of forest management and development. The word "capacity" requires definition as there is an opportunity not to understand the word as it is intended. It is the MNO's position that capacity be made clear to avoid confusion. Financial Compensation to participate in Forest Management activities in a full and meaningful manner must be the responsibility of the Manager. The Manager should not have ability to defer back to government (Crown) responsibility as a means of not meeting their obligations to the Aboriginal People. • The Program Participant has jointly established with affected and interested Aboriginal communities, opportunities for long-term economic benefits with the desired objectives: - Joint agreements signed by both parties clearly stating the nature of the economic opportunities, evidence of revenue-sharing from forest operations, and timelines; and - Indication of satisfaction from the affected and interested Aboriginal Community(ies). • A dispute resolution process is documented, where necessary, and has been jointly developed with the affected Aboriginal communities. All agreements must have a built in dispute resolution process that is applicable to the individual agreement and satisfactory to both parties. • These agreements must be in place prior to certification or re-certification of the forest management unit being granted. Agreements after the fact do not provide the manager with any incentive to establishing meaningful agreements. The granting of certificationfurther diminishes the Aboriginal Community's ability to negotiate a satisfactory agreement. When offering employment or contract of services opportunities in forestland activities the Program Participant must ensure that Aboriginal communities understand their business responsibility. For Example; (Does the Aboriginal community have a clear understanding of unit costs per cubic meters?) If the understanding cannot be demonstrated the Program Participant is promoting failure rather than success. The Program Participant supports the efforts of the affected Aboriginal communities to monitor forestry activities impacts over time on the values identified within the Aboriginal Areas of Concern Protection Agreement. The Program Participant must demonstrate that there is adequate financial and technical support in place to conduct these joint assessments on forest management activities. Traditional Knowledge studies are expansive in nature. The Program Participant must document that there is adequate financial and technical support to conduct meaningful land use studies and mapping. There must be evidence of a detailed work plan that indicates the work is systematically being completed and is achieving the desired results for both parties. Further, all indicators associated to Objective 18 – Public Land Management Responsibilities, identified outages must be assessed as a Major Corrective Action Required by the auditor team. The assessing of outages to the Aboriginal People as in minor in nature provides little to no incentive for Industry to engage in meaningful consultation. Understandably, there is a huge difference between Constitutional Rights as they pertain to Aboriginal Peoples (including Métis) verses a minor boundary trespass or failure to file a report on time. Therefore appropriate assessments must recognize the importance of Aboriginal Rights.			2	Comment ranges over many topics. As all Indigenous Peoples rights in Canada are protected by federal law a Canadian SFI certified company is bound to respect these laws and Objective 15 (Legal Compliance) re-iterates this commitment. The SFI standard is not meant to impact on any discussions/negotiations Indigenous Peoples have underway provincial or federal agency. Whether a Program Participants wishes to enter into a written disclosure agreements with an Indigenous organization is their choice and not a requirement of the standard. Likewise the decision to engage in capacity building efforts with Indigenous organizations is the decision of the SFI certified company and not a requirement of the SFI Standard. Similarly any decision to enter into joint agreements intended to promote economic development is a decision of the company and not a standard requirement.	See proposed language at Objective 8
PM 18.2 Indicator:					
1. Program that includes communicating with affected indigenous peoples to enable Program Participants to: a. understand and respect traditional forest-related knowledge; b. identify and protect spiritually, historically, or culturally important sites; and c. address the use of non-timber forest products of value to indigenous peoples in areas where Program Participants have management responsibilities on public lands.					

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SFI certification can / does occur on indigenous peoples traditional lands without them being aware of the fact.	Some indigenous peoples may not realize that their traditional lands are within the scope of an SFI forest management certificate. In Canadian provinces the government is charged with consultation with Indigenous peoples and the fact that the lands under discussion are being considered for SFI forest management certification or are already under a SFI forest management certificate is not made apparent to the affected Indigenous people.	18.2.1 (d): confirm the understanding of the affected indigenous peoples that their traditional lands are within the scope of an SFI forest management certificate and / or SFI forest management certification audit.	2	New objective 8 should address this comment.	See proposed language for Objective 8
Use this space to propose any removals or additions for Objective 18:					
Delete sentence in PM 18.1 that singly references the Forest Legacy Program. Either expand the example list or eliminate the examples altogether.			2	Reference to Forest Legacy Program is to serve as an example. Program Participants can support or promote other voluntary market based incentive programs of their choice.	None
Objective 19. Communications and Public Reporting. To broaden the practice of sustainable forestry by documenting progress and opportunities for improvement.					
Performance Measure 19.1. A Certified Program Participant shall provide a summary audit report, prepared by the certification body, to SFI Inc. after the successful completion of a certification, recertification or surveillance audit to the SFI 2010-2014 Standard.					
	Reporting: SFI Public Summaries continue to provide very little information about the audit findings. Essential components of a typical audit report should include evidence of conformity/nonconformity, which provides basic transparency for credible certification systems. Current language: Introduction, Section 10	Recommendation: For basic transparency, public summaries should include the evidence of conformity/nonconformity. See Governance above for complementary recommendations to strengthen transparency in reporting.	2	Comment does not accurately reflect the requirements for public reporting of SFI audit results. The public audit summary report requires a summary of the findings, including general descriptions of evidence of conformity and any nonconformities and corrective action plans to address them, opportunities for improvement, and exceptional practices.	None

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SFI Public Summaries continue to provide very little information about the audit findings. The foundation of a typical audit report consists of the evidence of conformity/nonconformity, which provides basic transparency for certification systems. Recommendation: For the sake of basic transparency, public summaries should include the evidence of conformity/nonconformity per each performance measure.	SFI Public Summaries continue to provide very little information about the audit findings. The foundation of a typical audit report consists of the evidence of conformity/nonconformity, which provides basic transparency for certification systems.	Recommendation: For the sake of basic transparency, public summaries should include the evidence of conformity/nonconformity per each performance measure.	2	Comment does not accurately reflect the requirements for public reporting of SFI audit results. The public audit summary report requires a summary of the findings, including general descriptions of evidence of conformity and any nonconformities and corrective action plans to address them, opportunities for improvement, and exceptional practices.	None
This should be a requirement of the certification body not the program participant. It add confusion. When the final report is complete, the CB should submit to both the participant and SFI.			2	The Task Group does not believe that the current requirement (the certification body prepares the public summary report and that the program participant submits it to SFI Inc.) is unclear or that there is a problem with this process.	None
PM 19.1 Indicator:					
1. The summary audit report submitted by the Program Participant (one copy must be in English), shall include, at a minimum, a. a description of the audit process, objectives and scope; b. a description of substitute indicators, if any, used in the audit and a rationale for each; c. the name of Program Participant that was audited, including its SFI representative; d. a general description of the Program Participant's forestland and manufacturing operations included in the audit; e. the name of the certification body and lead auditor (names of the audit team members, including technical experts may be included at the discretion of the audit team and Program Participant); f. the dates the certification was conducted and completed; g. a summary of the findings, including general descriptions of evidence of conformity and any nonconformities and corrective action plans to address them, opportunities for improvement, and exceptional practices; and h. the certification decision. The summary audit report will be posted on the SFI Inc. website (www.sfiprogram.org) for public review.					
19.1.e Why disclose individual audit team members and technical expert names?			2	Transparency of the audit process is key to maintenance of the integrity of the SFI audit process.	None
The requirement for discussion regarding indigenous peoples lands and their inclusion within the scope of the audit is absent from the SFI Public Summary report.	It is possible from reading of the Public Summary report to assume that no Indigenous lands were within the scope of the SFI audit.	new 19.1.1 (h): list of the affected indigenous peoples whose traditional lands are included within the scope of the SFI forest management certificate.	2	Task group to consider incorporating prposed changes this during the the second review period.	

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It would be useful for others viewing these public reports to understand in more depth the history and type of forest management occurring on these lands (19.1.1.d.).	Create a standard template to provide more history and background on the of the type of forest management (i.e. brief history, geologic/ecological setting, management objectives, major species & products, special sites and other protected areas, etc.) without disclosing business-sensitive or proprietary information.	19.1.1 - The summary audit report submitted by the Program Participant (one copy must be in English), shall include, at a minimum, d. a description of the Program Participant's forestland, forest management approach and manufacturing operations in accordance with [reference a template] included in the audit;	2	Task group to consider incorporating prposed changes this during the the second review period.	
Performance Measure 19.2. Program Participants shall report annually to SFI Inc. on their conformance with the SFI 2010-2014 Standard.					
The annual report to SFI, Inc. needs updated.	The annual report requirements should be reviewed and revised in order to address new metrics which better evaluate the success of SFI. For example, continuing to ask for how many landowner packets are delivered does not have value as landowner outreach is taking place in many other ways and there are questions about the value currently on "packets" especially in a world that is electronic, which uses social media and which uses more proactive field tours.	Have a working group review the annual report and recommend changes to better reflect the success of the SFI program.	2	The SFI annual progress report forms are reviewed periodically and always after a standard revision cycle to ensure the data requested are of value and current.	None
Objective 20. Management Review and Continual Improvement. To promote continual improvement in the practice of sustainable forestry, and to monitor, measure and report performance in achieving the commitment to sustainable forestry.					
Performance Measure 20.1. 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.					

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The term "management" is often taken to mean an organizations top level of management.	Often "management" for a program is delegated in a company and there is not a need for all employees to have an understanding of the management of the SFI Program within the company.	Program Participants shall examine findings and progress in implementing the SFI Standard and make appropriate improvements in programs.	2	Use of the term "management" is intentional and is targeted at those with decision-making authority in the organization regardless of where they are on the org chart. There is no requirement that "all employees" within the company be involved in management review but it is critical that the right ones are.	
PM 20.1 Indicators:					
1. System to review commitments, programs and procedures to evaluate effectiveness.					
Current indicator language does not acknowledge a review of audit findings.	Self-assessments and third-party assessment of conformance to the SFI Standard are often valuable tools for improving SFI programs and procedures. The work that is done to respond to audit findings should be recognized as a way companies can drive improvement.	System to review audit findings, commitments, programs and procedures to evaluate effectiveness.	2	The Performance Measure requires a "management review system to examine findings" but it could be made more explicit if the term "audit" was inserted. Task group to consider comment for incorporation during he second review period.	
The order of this doesn't flow right. The five Indicator System is to: 1) collect information, 2) monitor and document performance, 3) report the findings and recommendations to management, 4) make improvements to the program and then 5) communicate those changes to responsible personnel.			2	Task Group does not believe this language has caused significant problems among all the program participants. It is key for the PP to clearly define in their policies who is to be included in the management review and why	None
2. System for collecting, reviewing, and reporting information to management regarding progress in achieving SFI 2010-2014 Standard objectives and performance measures.					
"Management" is vague term and can have many different structures depending on the organization.	This indicator has caused confusion within audits. It is up to a company to ensure that a review is made and that improvements are implemented. Often that responsibility is delegated from "senior management" yet auditors push for a formal senior management review.	System for reviewing progress in achieving SFI 20XX-20XX Standard objectives and performance measures with appropriate managements.	2	Task Group does not believe this language has caused significant problems among all the program participants. It is key for the PP to clearly define in their policies who is to be included in the management review and why	None

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See comment above on five point Indicators.			2	Task Group does not believe this language has caused significant problems among all the program participants. It is key for the PP to clearly define in their policies who is to be included in the management review and why	None
3. Annual review of progress by management and determination of changes and improvements necessary to continually improve conformance to the SFI 2010-2014 Standard.					
See comment above on five indicators. Don't need to reference the version of the Standard.			2	Task Group does not believe this language has caused significant problems among all the program participants. It is key for the PP to clearly define in their policies who is to be included in the management review and why	None
See comments in removals/additions.			2	Not possible to link to specific indicator.	None
Use this space to propose any removals or additions for Objective 20:					
Comme ce chapitre représente l'essentiel de la norme SFI 2010-2014, il serait peut-être avantageux d'avoir une section "Définitions" immédiatement à la fin de ce chapitre. Si on fait des tirés à part de la norme, on aurait ainsi tout le matériel nécessaire pour bien la comprendre. Dans la norme, devrait-on mettre une emphase sur les notions suivantes: "selon l'échelle", "le degré de risque", "les impacts" ? Des versions françaises des documents clés en lien avec SFI sont toujours appréciées.			2	Comment is directed at the utility of including the definitions for each Section included in that section versus have all definitions in one Section (Section 13). Task group decided to keep the existing structure with definitions in one Section. Comment also suggests the standard would benefit from the use of terms "depending on scale", degree of risk" and "impacts", Task Group considered this but believes the suggestd terms could introduce more subjectivity into the standard.	None

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Remove Objective 20.1.3 because it is now covered in 20.1.2.			2	Two different process at work in the indicators cited: one requires a system for information collection and review of information to be used to produce a report to management; the second indicator speak to the actual review by management of the report and the subsequent outcomes from the review by management to ensue continual improvement to conformance to the SFI standard.	None

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SFI CHAIN-OF-CUSTODY STANDARD					
PREFACE					
It is very important to us that the SFI Chain of Custody standard be endorsed by the PEFC.	As we seek to have consistent purchasing practices around the world, the PEFC endorsement system helps provide assurance of equivalence. Being endorsed by a recognized international standard would further support the credibility of the entire SFI certification system.		2	SFI Inc. is monitoring developments with the PEFC CoC. Should the SFI Board of Directors decide that PEFC endorsement of the SFI COC is required SFI staff will be ready to undertake this project. Revisions proposed to align aspects of the SFI CoC to the PEFC CoC are: pre-consumer recycled content recognized as certified content; a standardized list of product claims; Volume Credit calculation method dame as PEFC; process to avoid controversial sources enhanced with an expanded definition for "controversial sources"; enhanced management system requirements regarding internal audits and outsourcing.	See proposed revisions in Section 3 - SFI Chain of Custody.
Labeling: The SFI Certified Sourcing Label continues to confuse the marketplace and lack transparency, in terms of the wide range of practices that can be behind the label. These can vary greatly, across what are considered "responsible sources", from SFI or CSA certified lands, to 100% pre-consumer materials, to SFI Fiber Sourcing. Beyond BMPs and using trained loggers, SFI Fiber sourcing standard is based wholly on outreach and education and does not provide assurances on even the most basic elements of responsible forestry (sustained yield, rare species conservation, sound silviculture, etc.), traceability, or avoidance of some controversial sources such as conversion.	The SFI Certified Sourcing Label continues to confuse the marketplace and lack transparency, in terms of the wide range of practices that can be behind the label.	Recommendation: SFI certified sourcing label requirements should be strengthened significantly or the label done away with entirely, as it is misleading in the marketplace to have a label that looks similar to other SFI labels, but the vast majority of fiber currently covered by it does not have any association with certified forest management fiber content. .	2	SFI program is the only program that addresses sourcing from small, non-certified lands. The requirements of certified sourcing are directed at ensuring amongst other requirements the use of best management practices, promotion of conservation of biological diversity and where they are available the use of Qualified Logging Professionals. The SFI Certified Sourcing Label is clear in that it is not making a claim of certified content.	None

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We want SFI's Chain of Custody to be PEFC endorsed.			2	SFI Inc. is monitoring developments with the PEFC CoC. Should the SFI Board of Directors decide that PEFC endorsement of the SFI COC is required SFI staff will be ready to undertake this project. Revisions proposed to align aspects of the SFI CoC to the PEFC CoC are: pre-consumer recycled content recognized as certified content; a standardized list of product claims; Volume Credit calculation method dame as PEFC; process to avoid controversial sources enhanced with an expanded definition for "controversial sources"; enhanced management system requirements regarding internal audits and outsourcing.	See proposed revisions in Section 3 - SFI Chain of Custody.
SECTION 1: GENERAL					
The second paragraph in the Scope defines the organization covered by CoC as "any entity harvesting, transporting, handling or processing forest-based products at any stage from a forest to a final consumer." This seems to exclude selling of products.	Selling is an activity performed by certified organizations. Unless there is some justification for leaving this out that we are unaware of, it should be included in the statement.	...any entity harvesting, transporting, handling, processing or selling forest-based products at any stage from a forest to a final consumer.	2	Task Group has revised the current language at 2.3 Separation of the Certified Forest Content to include the "sales" process.	See proposed language at 2.3.
There are really three accounting methods and the SFI needs allow a Volume Credit Accounting Method without first having to calculate the percentage. Also, Physical Separation is a misnomer. It is Physical Separation or Identification.		The Standard specifies three optional approaches for chain of custody accounting, namely physical separation/identification, percentage and volume credit.	2	Task Group has revised the current language at 3.5 to reflect the inclusion of the a third approach for Volume Credit accounting.	See proposed language at 3.5 Volume Credit Method.

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SECTION 2: REQUIREMENTS FOR CHAIN OF CUSTODY PROCESS - PHYSICAL SEPARATION METHOD					
Need to eliminate the redundancy between this and the section on Percentage. Identification of origin, sale of certified products are the same in both sections. Reduce redundancy.		Identification of Certified Forest Content. Not separation. Need to explain the circumstances where transfer or identification of a production batch is acceptable. Need to point out that there is no mixing of certified and non-certified material. Change Category of Origin to Identification of the Inputs and their certification status.	2	Task Group did consider the revisions needed to remove the redundancies between Part 2 (Physical Separation) and Part 3 (Percentage Method). For the time being it was decided to leave the structure of the SFI CoC structure unchanged.	See proposed revisions throughout Section 3 Chain of Custody.
2.1.1 - The requirement that certified content be "clearly identifiable" throughout all stages of the production process is not feasible, and has caused audit problems. 2.4.2.d - If an organization elects not to count post-consumer recycled as certified, or make a recycled claim, it is considered a neutral source and the percentage does not need to be provided to customers. 2.4.1 - The examples of documentation for sales information to the customer are all physical. Clarify that documentation can be electronic, such as web sites, transmission by e-mail, etc. 2.2.2 - Should be identical with 3.2.2, which is much clearer. 2.3 - This requirement is redundant with 2.1.1. Additionally, it is impossible for the certified content to remain "clearly identifiable throughout the production." This has caused auditor problems. 2.4 - This is virtually, though not exactly, the same as 3.5, though it is titled slightly different. Consider consolidating repeated information in these two sections, but only if it can be done in a way that maintains simplicity.	2.1.1 - During the production process, certified content is often processed and modified, losing any labeling or other identifying features. As long as the system is closed and controlled, this should be acceptable. 2.2.2 - 3.2.2 was corrected in an earlier revision, and 2.2.2 should have been corrected at the same time but was missed. Obtaining "confirmation from suppliers of certified content that the criteria have been met" is vague and confusing. 2.3 - Feasibility 2.4 - Simplicity and conformity. 2.4.1 - The words "a document" in this requirement gives the impression that it is always something physical. The business world is moving away from physical documentation. To avoid certified organization, auditor, and customer confusion, the word documentation should be replaced, and electronic communication specifically named as an example. 2.4.2.d - Some products may have varying levels of post consumer recycle in them, which cannot be accurately determined. In these cases it is not feasible to report recycle percentage, and therefore not appropriate to count this input as certified content.	2.1.1 - …shall be sure that the certified content is separated or clearly identified or controlled to ensure it is not mixed with or replaced by uncertified content 2.2.2 - The organization shall obtain or access confirmation for all suppliers of the certified forest content documentation, which proves that the criteria set for the supplier of the certified forest content have been met. 2.3 - Eliminate the redundancy. If not, add a 2.3.c saying "controlled during the production process to ensure it is not mixed with or replaced by uncertified material." 2.4 - Whether 2.4 and 3.5 are combined or not into a single section, title both "Sale of Certified Products". 2.4.1 - Replace "a document" with "written information" or at least "documentation". Consider adding "….and may be provided electronically." to the end of the sentence. 2.4.2.d - Category of origin – (i.e. percentage from certified forest content, from certified sourcing, and from post-consumer recycled content if counted as certified),	2	Task Group considered comments and has proposed several revisions that address some of these comments. Those addressed are relate to comments 2.2.1; 2.2.2; 2.3 (c); 2.4.1 and 2.4.2 (d).	See proposed revisions to Section 3 - SFI Chain of Custody 2.1.1, 2.2.2, 2.3, 2.4.1, and 2.4.2.

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No changes. This allows for a common sense approach to claims transfer. our company utilizes multiple software packages for invoicing and shipping depending on the country and product. This wording allows us to prove to the auditor that we are properly transferring the claim without being prescriptive on the mechanism.			3	Comment is supportive of keeping Part 2 (currently Section 2) unchanged.	Numerous changes proposed through out Part 2 of Section 3 Chain of Custody.
SECTION 3: REQUIRMENTS FOR CHAIN OF CUSTODY PROCESS - PERCENTAGE-BASED METHOD					
Production Batch should be replaced with Claim Period. Only solid wood producers do production batches and the term is confusing. We are really talking about a time period over which inputs are accounted for. Process for avoiding controversial sources assumes all sources from North American are non-controversial. We can't make that blanket assumption. Need to apply Due Diligence System for all sources as part of a Risk Assessment of specific sources, not the entire continent. The Volume Credit Method in Section 3.4.2 should be it own Major Section as an alternative to the Percentage Method. Need to be able to go directly to tons in and tons out without having to calculate the percentage first. This is a major problem for the SFI and is inconsistent with PEFC. The volume credit method needs include inputs of Pre-consumer, Post-Consumer and Certified Forest Content to be the same as PEFC.	PEFC allows three component inputs to count as Certified Credits--Pre-, Post- and Certified Forest Content. SFI must move in this direction.		2	Task Group has reviewed the comment and has proposed the use of the term Claim Period and the removal of the term Production Batch.	See revisions throughout SFI Section 3 Chain of Custody

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3.3 - Not sure if this comment belongs here, but nowhere else fits better: Pre-consumer content should be treated exactly as post-consumer. Treating pre-consumer as only certified sourcing negatively impacts certified content percentages. 3.1.2 - Production batch is not a user friendly term. 3.3.1 - The Note on post-consumer content is very difficult to understand. 3.3.4 - It is permissible for similar product types with similar inputs produced at more than one facility to calculate their certification percentages from the combined inputs of the facilities. Should that be referenced in this requirement or elsewhere? Or should that be an interpretation remaining outside of the standard? 3.4.2.1 Note - The 54% percent in the Note is an example. This is confusing to someone reading the standard for the first time. 3.5.1 - The examples of documentation for sales information to the customer are all physical. Clarify that documentation can be electronic, such as web sites, transmission by e-mail, etc. 3.5.2.d - If an organization elects not to count post-consumer recycled as certified, or make a recycled claim, it is considered a neutral source and the percentage does not need to be provided to customers. 3.6.1 - This requirement states that controversial sources are not allowed in SFI-labeled products, and ignores the fact that not all certified products carry the label. 3.6.1.8 - This just says to take a look at Section 7 on illegal logging, but does not require compliance.	3.3 - Preconsumer use is a good thing, and should not be penalized. Under the average percentage method, certified forest content must be at least 10%. So if a product is made from 100% virgin fiber, at least 10% must come from certified land. Any post-consumer content is counted as neutral in this calculation, but pre-consumer is not. If the product is made with 50% post-consumer, then the certified forest content calculation will be 20% if 10% comes from certified land. If the recycle is pre-consumer, however, then the certified forest content calculation will result in 10%. 3.1.2 - Changing terminology from Production Batch to Product Group would make the term more understandable and identical to the other CoC standards. 3.3.1 - This rewording or some alternative will make the treatment of post-consumer recycle much clearer. Also, we believe that a critical word was left out, creating most the confusion. The second and third time "certified content" appears, it should have said "certified forest content" instead. 3.3.4 – N/A 3.4.2.1 Note - It could be 44%, or 61%, or any other %. Calling this a Note makes it sound like it only applies to 54%. This Note is a holdover from the PEFC CoC standard. 3.5.1 - The words "a document" in this requirement gives the impression that it is always something physical. The business world is moving away from physical documentation. To avoid certified organization, auditor, and customer confusion, the word documentation should be replaced, or electronic communication specifically named as an example. 3.5.2.d - Some products may have varying levels of post- consumer recycle in them, which cannot be accurately determined. In these cases it is not feasible to report recycle percentage, and therefore not appropriate to count this input as certified content. 3.6.1 - This change would make this requirement apply to all certified products, not just labeled ones, which is incorrect. 3.6.1.8 - This could be misinterpreted as currently written.	3.3 - N/A – If this concept is approved, a number of minor changes would be needed throughout the standard and Section 13 - definitions. 3.1.2 - Replace Production Batch throughout the standard with Product Group. 3.3.1 - Note: When making claims about post-consumer recycled content, the post-consumer recycled content can count towards certified content and the amount must be disclosed to the customer. When calculating certified FOREST content percentages, however, post-consumer content is considered a neutral source and must be excluded from the calculation. Neutral sources are not counted towards or against the calculation of the certified FOREST content percentages in chain of custody tracking. 3.3.4 – Unknown 3.4.2.1 - Change "Note:" to "Example:" 3.5.1 - Replace "a document" with "written information" or at least "documentation". Consider adding "....and may be provided electronically. to the end of the sentence. 3.5.2.d - Category of origin – (i.e. percentage from certified forest content, from certified sourcing, and from post-consumer recycled content if counted as certified), 3.6.1 - Replace "SFI-labeled products" with "SFI-certified products." 3.6.1.8 - Comply with Section 7 SFI Legality Requirements and Policies for Avoidance of Illegal Logging.	2	Task Group considered all these comments and has proposed several revisions throughout Part 3 of the SFI Chain of Custody. Regarding pre-consumer content as certified when calculating SFI certified content - Task Group has proposed adopting this definition.	See proposed revisions to Section 3 SFI CoC - Part 3 clauses: 3.3; 3.1.2; 3,2,1; 3.3.1; 3.6.1; 3.6.2 and 3.7.1.8.

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The "Note" in 3.3.1 clarifies that recycled content (pre or post) cannot count towards certified content.	Other credible and widely used chain of custody standards (i.e. PEFC ST 2002:2013) allow the inclusion of reclaimed material in the calculation of certified content and do not require a separate claim.	3.3.1 The organization shall calculate the certification percentage separately for each production batch according to the following formula: Pc Certification percentage Vc Certified content Vo Other raw material (certified sourcing) Note: See Certified content in Section 13 Definitions. When making claims about post-consumer recycled content, the post-consumer recycled content can count towards certified content and the amount must be disclosed to the customer. However, when making claims about certified content, the post-consumer recycled content must be counted as a neutral source. Neutral sources are not counted towards or against the calculation of the certified content percentages in chain of custody tracking. certified content: Raw material that can count towards the calculation of certified content percentages in chain of custody tracking. Below are the acceptable certified content sources. certified forest content: Raw material from lands third party certified to acceptable forest management standards. post consumer recycled content: (as defined in Section 13, SFI Definitions).	2	Task Group has reviewed and has proposed that pre-consumer recycled material can count toward the calculation of SFI certified content.	See revisions throughout SFI Section 3 Chain of Custody and SFI Section 13 - Definitions

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Section 3 of the Standard (under 2.2.1, 2.4.2, 3.2.1, & 3.5.2) says "Category of origin – (i.e. percentage from certified forest content, from responsible fiber sources, and from post-consumer recycled content)", but the definition of "responsible fiber sources" in Section 13 includes both of these other two components as well as "Pre-Consumer Recycled Content". Given these four variable components, the variety of possible chain-custody labels and claims about content are confusing. As a result, the three-component labels and claims are seldom used or, in the case of claims, frequently used incompletely. The use of the credit system likewise produces labels & claims that are generally little understood or, in the case of claims, often used incompletely or otherwise incorrectly.			2	The Task Group has proposed a standardized set of claims to assist with communicating SFI claims between buyer and seller of certified products. Regarding the SFI labels the proposed inclusion of pre-consumer recycled content in the calculation of SFI certified content will required revised labels for on-product use.	See proposed language and labels at 3.4.1 and 3.5.6.
SECTION 4: MINIMUM MANAGEMENT SYSTEM REQUIREMENTS					
4.6.1 Too costly	Adds too much internal cost.	The organization shall develop and maintain an internal audit sampling system covering all requirements.....	2	Task Group reviewed the comment and has revised and augmented the requirements for internal audits of the SFI CoC program	See proposed language for 4.6.

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Certification by an external Professional Organization or Registration by a State for Professional Status should also be required.	Improve the stature of the Chain of Custody personnel.	Consistent with the concept of utilizing an in-house auditor who is a CPA, versus just an accountant. Professional standards and certification will enhance the status of the Chain of Custody process.	2	Task Group reviewed comment. While having personnel with an accounting background conduct CoC audits could be a good feature it is not a requirement for SFI CoC audits and could potentially add cost to the audit process. COC auditors working for accredited Certification Bodies must meet specific competency requirements. The Accreditation Bodies (ANSI and SCC) conduct two annual audits of every certification body accredited to conduct audits to SFI Sections 3 and 4. If these audits result in findings the CBs must resolve these or face losing accreditation.	None
Inspection and Control is really Internal auditing and should be changed.		Change Inspection and Control to Internal Auditing.	2	Task Group concurs	See proposed language for 4.6 - Internal Audit and Management Review
SFI CHAIN-OF-CUSTODY STANDARD SECTION 5 - OUTSOURCING AGREEMENTS					

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Change standard to allow the use of an outsourcing agreement with the contracted facility/organization and not include them in the scope of the SFI CoC certificate..	We propose instead of adding the facility/organization to the certificate; it is okay to have an outsourcing agreement with them, as long as it meets certain requirements.	Suggested requirements for Outsourcing Agreement (from PEFC 2002:2013) •The organization shall take full responsibility for the all the subcontracted activities in relation with the organization's chain of custody. •The organization shall have a written agreement with all subcontractors ensuring that the organization's material/products are physically separated from other material or products. •The organization's internal audit program shall cover the subcontractor's activities.	2	Task Group has reviewed the comment and has proposed new language that addresses the topic of outsourcing within a SFI CoC program.	See proposed language for 5.0 - Outsourcing.
Stay away from doing internal audits on outsourced warehouses and distribution network.	Adds no value and increases costs		2	Task Group reviewed the comment and has revised and augmented the requirements for internal audits of outsourced operations within a SFI CoC program.	See proposed language for 5.0 - Outsourcing.
This section is not clear as to who is an outsourcing entity. Is this limited to outputs that are processed and remanufactured? Or, does this include loggers, chip mills, wood yards, etc.? This whole section needs work. Don't know what it means that Organizations shall work with their CB to demonstrate legal ownership. That is not the issue.	Outsourcing should include inputs (Chip Mills) as well as outputs (Converters). Don't include loggers, trucker or anyone that just handles the certified material.		2	Task Group agrees that loggers and log/chip truck operations are not outsource operations for the purposes of SFI CoC certification.	See proposed language for 5.0 - Outsourcing.
APPENDIX 3: CRITERIA FOR THE EVALUATION OF CHAIN OF CUSTODY CERTIFICATION STANDARDS FOR USE IN THE SFI PROGRAM					
SFI should not allow Canadian companies to use the SFI CoC Labels when the mills are only PEFC CoC certified. If you want to use the SFI labels, you need to have an SFI CoC certificate. The rules of PEFC are too different now to allow this to continue.			1	This scenario is no longer possible - addressed by SFI in 2012. To use the SFI On-Product label you must hold an SFI CoC certificate.	None
Use this space to propose any removals or additions for the SFI chain-of-custody standard:					

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SFI should not allow Canadian companies to use the SFI CoC Labels when the mills are only PEFC CoC certified. If you want to use the SFI labels, you need to have a valid SFI CoC certificate. The rules of PEFC are too different now to allow this to continue. SFI is giving away its franchise by allowing use of the SFI labels without an SFI CoC certificate.			1	This scenario is no longer possible - addressed by SFI in 2012. To use the SFI On-Product label you must hold an SFI CoC certificate.	None
"Section 3 of the Standard (under 2.2.1, 2.4.2, 3.2.1, & 3.5.2) says "Category of origin – (i.e. percentage from certified forest content, from responsible fiber sources, and from post-consumer recycled content)", but the definition of "responsible fiber sources" in Section 13 includes both of these other two components as well as "Pre-Consumer Recycled Content". Given these four variable components, the variety of possible chain-custody labels and claims about content are confusing. As a result, the three-component labels and claims are seldom used or, in the case of claims, frequently used incompletely. The use of the credit system likewise produces labels & claims that are generally little understood or, in the case of claims, often used incompletely or otherwise incorrectly. "			2	The Task Group has proposed a standardized set of claims to assist with communicating SFI claims between buyer and seller of certified products. Regarding the SFI labels the proposed inclusion of pre-consumer recycled content in the calculation of SFI certified content will required revised labels for on-product use.	See proposed language and labels at 3.4.1 and 3.5.6.
General Section 3 Comments					

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Section 3 SFI Chain-of-Custody standard: Elements of the Chain-of-Custody standard are weak or confusing, especially related to labeling concerns mentioned above. There is also a common misconception in the marketplace the SFI CoC standard is endorsed by the PEFC, which it is not.	Recommendation: SFI should pursue endorsement of its CoC standard by PEFC and ensure alignment with the requirements of PEFC 2002:2013 CoC standard released in May 2013.		2	SFI Inc. is monitoring developments with the PEFC CoC. Should the SFI Board of Directors decide that PEFC endorsement of the SFI COC is required SFI staff will be ready to undertake this project. Revisions proposed to align aspects of the SFI CoC to the PEFC CoC are: pre-consumer recycled content recognized as certified content; a standardized list of product claims; Volume Credit calculation method dame as PEFC; process to avoid controversial sources enhanced with an expanded definition for "controversial sources"; enhanced management system requirements regarding internal audits and outsourcing.	See proposed revisions in Section 3 - SFI Chain of Custody.

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Section 3 - 3.4: The SFI "Chain of Custody" labels mislead consumers by treating some types of non-certified forest content the same as certified forest content for the purpose of calculating fiber inputs and label claims/usage. The SFI allows the "Certified Forest Content" percentage claims on its Chain of Custody labels to be disproportionate to the amount of SFI certified fiber actually contained in the labeled product lines. Similarly, the SFI allows its volume-credit based Chain of Custody labels to be used disproportionately to the amount of SFI certified fiber actually contained in the labeled product lines. In particular, wood and fiber from American Tree Farm System (ATFS) "certified" forests is counted the same as wood and fiber from SFI certified forests, for the purpose of calculating "Certified Forest Content" and corresponding label statements, in the case of the percentage labels, or corresponding allowable usage of the label, in the case of the volume credit labels. As much as 100% of the wood in products bearing the SFI percent content and volume credit labels can come from such forests. This is misleading, given that the ATFS system lacks most of the SFI Standard's requirements (weak as those requirements are), and is even less of an independent system than the SFI, given the ATFS Standard's almost complete lack of performance standards whose interpretation and performance outcomes are not largely at the landowner's discretion, given that most ATFS forests appear to be "certified" by consulting foresters rather than third-party accredited verifiers, and given the lack of independence and balance in the ATFS' governance. Relevant SFI provisions: SFI Chain of Custody Standard, section 3.4; SFI Rules for Use of SFI On-Product Labels; SFI Definitions.			2	The comment is wrong in its claim regarding the percentage of SFI certified content contained in certified product. Likewise, any claims under the Volume Credit method must be made at the 100 % level, not as the comment would suggest. Finally, SFI on-product labels must conform to the US Federal Trade Commission "Green Guides". Regarding the ATFS, this is an endorsed standard under the PEFC and is defined as an acceptable standard in the SFI program for the purposes of calculating SFI certified content.	None

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RULES FOR USE OF SFI ON-PRODUCT LABELS					
PREFACE					
Labeling: The SFI Certified Sourcing Label continues to confuse the marketplace and lack transparency, in terms of the wide range of practices that can be behind the label. These can vary greatly, across what are considered "responsible sources", from SFI or CSA certified lands, to 100% pre-consumer materials, to SFI Fiber Sourcing. Beyond BMPs and using trained loggers, SFI Fiber sourcing standard is based wholly on outreach and education and does not provide assurances on even the most basic elements of responsible forestry (sustained yield, rare species conservation, sound silviculture, etc.), traceability, or avoidance of some controversial sources such as conversion.	SFI certified sourcing label requirements should be strengthened significantly or the label done away with entirely, as it is misleading in the marketplace to have a label that looks similar to other SFI labels, but the vast majority of fiber currently covered by it does not have any association with certified forest management fiber content. .		2	SFI program is the only program that addresses sourcing from small, non-certified lands. The requirements of certified sourcing are directed at ensuring amongst other requirements the use of best management practices, promotion of conservation of biological diversity and where they are available the use of Qualified Logging Professionals. The SFI Certified Sourcing Label is clear in that it is not making a claim of certified content. The proposed revision to Section 2 SFI 2015-2019 Standard has a new objective Objective 9 - Promotion of Biodiversity in Fiber Sourcing), requirements for written agreements for the purchase of raw material sourced directly from the forest, and enhanced definitions for illegal logging and controverisal sources.	See proposed language for Section 2 SFI 2015-2019 Objective 9 and Indicator 10.1.2, and Section 13 SFI Definitions for illegal logging and controversial sources.

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The SFI Certified Sourcing Label continues to confuse the marketplace and lack transparency, in terms of the wide range of practices that can be behind the label. These can vary greatly, across what are considered "responsible sources", from SFI or CSA certified lands, to 100% pre-consumer materials, to SFI Fiber Sourcing. Beyond BMPs and using trained loggers, SFI Fiber sourcing standard is based wholly on outreach and education and does not provide assurances on even the most basic elements of responsible forestry (sustained yield, rare species conservation, sound silviculture, etc.), traceability, or avoidance of some controversial sources such as conversion.	The SFI Certified Sourcing Label continues to confuse the marketplace and lack transparency, in terms of the wide range of practices that can be behind the label.	The SFI Certified Sourcing Label continues to confuse the marketplace and lack transparency, in terms of the wide range of practices that can be behind the label.	2	SFI program is the only program that addresses sourcing from small, non-certified lands. The requirements of certified sourcing are directed at ensuring amongst other requirements the use of best management practices, promotion of conservation of biological diversity and where they are available the use of Qualified Logging Professionals. The SFI Certified Sourcing Label is clear in that it is not making a claim of certified content. The proposed revision to Section 2 SFI 2015-2019 Standard has a new objective Objective 9 - Promotion of Biodiversity in Fiber Sourcing), requirements for written agreements for the purchase of raw material sourced directly from the forest, and enhanced definitions for illegal logging and controverisal sources.	See proposed language for Section 2 SFI 2015-2019 Objective 9 and Indicator 10.1.2, and Section 13 SFI Definitions for illegal logging and controversial sources.
RULES FOR USE OF SFI CERTIFIED SOURCING LABEL1. SCOPE AND PURPOSE					
We suggest that SFI discontinue the use of the "Certified Sourcing" label.	Allowing the use of the SFI label without requiring the product to have actual certified content stands to further confuse consumers on the meaning and value of eco-labels and certification schemes and ultimately undermines the credibility of the entire SFI certification system.		2	Task Group believes that the SFI Certified Sourcing Label is a valuable tool for demonstrating responsible fiber sourcing from small, non-certified lands. The requirements of certified sourcing are directed at ensuring amongst other requirements the use of best management practices, promotion of conservation of biological diversity and where they are available the use of Qualified Logging Professionals. The SFI Certified Sourcing Label is clear in that it is not making a claim of certified content.	None
3. CERTIFIED SOURCING LABEL					

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3.3 - Though understandable, this requirement is poorly worded.	3.3 - Clarity	3.3 - If raw material comes from sources outside of the U.S. and Canada, adequate measures must be taken to ensure certified products do not include fiber from controversial sources. Otherwise the label cannot be used.	2	Task group has reviewed comment will incorporate the suggestion during the second review period.	
The threshold for use of the SFI Certified Sourcing Label and claim should be 70%, consistent with PEFC and FSC. This section needs to explicitly provide for an SFI Certified Sourcing Claim, not just a Label. The Certified Sourcing requirements should be a Standard to which a company is certified to, not just a section of the on-product labeling rules.		Certified Sourcing Claims and Label. They must account for at least 70% as coming from certified sourcing.	2	Comment is confusing the intent of the SFI Certified Sourcing label. The Certified Sourcing label is used to demonstrate product is manufactured fiber with that is responsibly sourced from non-certified lands. The Task Group has proposed the use of a claim to accompany the Certified Sourcing label - SFI X% Certified Sourcing. Finally, Program Participants can be certified to the requirements of Section 4 which is accredited is ANSI.	See proposed language in Section 3 Part 2.2.1 (d) ii; 2.4.2 (d) v.; Part 3.2.1 (d) ii and Section 4, Part 5.5.
5. CERTIFIED SOURCING					
No comment					
6. SOURCING FROM OUTSIDE THE UNITED STATES AND CANADA					
6.1.1 - A signed self-declaration should not be required from outside the U.S. and Canada if the raw material is from a nation with adequate laws and enforcement minimizing the risk of obtaining material from a controversial source.	6.1.1 - Unnecessary requirement for suppliers in well developed nations with adequate social laws and robust protection against illegal logging. Also, please consider if the self-declaration requirement can be eliminated without adding more difficult requirements to replace it.	6.1.1 - In countries without adequate social and illegal logging legal protections, require a signed self-declaration that the supplied raw material does not originate from controversial sources. If it has signed contracts with its suppliers, it shall include such a declaration in the contracts.	2	Comment Addressed with proposed language in Section 4, Part 6. Process to Avoid Controversial Sources.	See proposed language in Section 4, Part 6 - Process to Avoid Controversial Sources.
9. OTHER CONDITIONS PERTINENT TO PRIMARY AND SECONDARY PRODUCERS					
This entire section of "other conditions" seems disjointed, and out of place. Consolidate these items where appropriate throughout Section 4.	Simplicity and clarity		2	Comment addressed with proposed language in Section 4, Part 10	See proposed language in Section 4, Part 10.
RULES FOR USE OF SFI CHAIN-OF-CUSTODY ON-PRODUCT LABELS					

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Having three lines on a label, plus the possibility of the Mobius loop can be confusing.	More consistent with other certified content reporting programs and makes the label easier to read. Whether the certified content is from post consumer recycled sources or certified forests, it is still certified and there are other means of tracking and reporting post-consumer content claims to customers.	Allow the option to combine post consumer recycled content with certified forest content when both categories are in a product into one certified content line.	2	Comment addressed with proposed new labels in Section 3, Parts 3.4.1 and Part 3.5.6.	See proposed new labels in Section 3, Parts 3.4.1 and 3.5.6.
The SFI needs to move away from percentage based labels. They don't work in reality as the X% is always changing and label plates cannot be changed every month or quarter to adjust. The Volume Credit Label needs to include Pre-consumer, Post-consumer and Certified Forest Content.			2	Task group decided to retain X% text in labels and claims. Comment regarding Volume Credit, pre/post consumer and certified content addressed with proposed new labels in Section 3, Part 3.5.6.	See proposed new labels in Section 3, Part 3.5.6.
Align with FSC's and PEFC's labeling threshold of 70% certified fiber, instead of 10%.			2	Task group decided to retain provision labeling threshold of at least 10% certified forest content in labels and claims. For labelling using the Volume Credit appraoch the 10% threshold is appropriate becasue the company is only selling the amount it has in its volume credit account. If the company is using the Average Percent method the label is transparent since the 10% is on the label.	See proposed language for Section 4, Part 10.14.
1.2 - The CoC label with the statement "At least X% Certified Forest Content" says nothing about the remainder of the content, creating marketing and sales concerns about customer acceptance.	1.2 - Clarity and customer acceptance. This option has already been approved as an exception by SFI, Inc.	1.2 - Add the statement "Remainder Certified Sourcing" to the label.	2	Task group reviewed the comment but has decided to retain the "at least x% certified forest content" label believing it is a credible label. If a company wishes to communicate additional information about the product there are the "X% certified forest content / X% certified sourcing" labels.	None

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SFI should adopt a labeling threshold of 70% certified virgin content before companies are allowed to use a Certified Chain of Custody label. This would align with other international standards' requirements for use of their Chain of Custody labels, such as PEFC and FSC.	Allowing the use of the SFI Chain of Custody label without maintaining a credible threshold for certified virgin content stands to further confuse consumers on the meaning and value of eco-labels and certification schemes and ultimately undermines the credibility of the entire SFI certification system.		2	Task group decided to retain provision labeling threshold of at least 10% certified forest content in labels and claims. For labelling using the Volume Credit approach the 10% threshold is appropriate because the company is only selling the amount it has in its volume credit account. If the company is using the Average Percent method the label is transparent since the 10% is on the label.	See proposed language for Section 4, Part 10.14.
GENERAL RULES FOR USE OF SFI ON-PRODUCT LABELS	GENERAL RULES FOR USE OF SFI ON-PRODUCT LABELS				

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Introduction - The on-line label/logo approval system is referenced here or elsewhere. Same in the Off-product Section. 2 - States that there are no size limitations for labels, but Appendix 1 gives minimum sizes of 1 and 1 ½ inches. 3 - The PEFC standard has been revised, and these references to PEFC Annex 4 and 5 are incorrect. 4 - Allow pre-consumer to be included with post-consumer in the Mobius loop percentage. 11.a - This statement is very confusing and needs to be reworded. 18 - Requiring immediate reporting of the misuse of "marks" is often not feasible or desirable. 22 - This says the label size is determined by the company. Appendix 1 gives additional specifications. 24 - The SFI website reference also applies to 25, and should be repeated there. Alternatively. It could just be deleted from 24. The website link can be put on anything, anywhere, anytime. Why specifically reference only in 24? 25 - The sentence starting with "A certified Program Participant…" must have been added here as reinforcement, as this pretty much applies whether the taglines are used or not.	Introduction - We are required to use this system, so it should be so stated in the standard. 2 - Clarity and conformity. 3 – Conformity 4 - Conformance in the marketplace with PEFC and that other CoC standard. Even though SFI does not consider pre-consumer to be certified, pre-consumer recycle IS recycle. 11.a – Clarity 18 - Often time and research is needed to discover the extent of the misuse, its cause, and initiate immediate corrective actions. 22 – Conflicting statement 24 – Consistency 25 - Simplicity. This statement is full of bonus information that may not be necessary.	Introduction - Add explanatory reference to the on-line label/logo approval system. Do the same in the Off-product Section. 2 - Correct error, or rewrite to clarify meaning. 3 - Reference the PEFC CoC standard, only, instead of specific sections. This would eliminate any future nonconformities in the standard if PEFC changes again with the next five years. 4 - The recycled Mobius loop may only be used within the SFI label when the organization is certified to the SFI Chain-of-Custody Standard and complies with associated label rules. The recycle percentage within the Mobius loop shall be calculated based on the combined pre and post-consumer recycled content as defined in Section 13 SFI Definitions. 11.a - On-product labels may only be displayed if they are 1) accompanied by the statement "Look for this mark on (specified product)", or 2) part of a picture of the labeled product. 18 - Label users who discover misuse of any of the SFI marks must report this to the Office of Label Use and Licensing as soon as practicable, within a maximum of one week. 22 - The size of the label can be determined by the certified company subject to the specifications in Appendix 1 and approval by the SFI Office of Label Use and Licensing. 24 - Add option for SFI website inclusion to 25, or delete from both. 25 - The following geographic taglines can be used in combination with the SFI on-product labels and with promotional materials as long as the wood fiber has been sourced	2	Comments for the following items will be considered during the next review period: 2; 3; 4; 11 (a); 22; and 24.	Rules for the artwork for labels will be updated to address comment.
General Comments					

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SFI 2010-2014 STANDARD COMMENT	RATIONALE FOR PROPOSED CHANGE	PROPOSED NEW LANGUAGE	COMMENT REVIEW	RATIONALE	REVISED OR PROPOSED NEW LANGUAGE
Labeling: The SFI Certified Sourcing Label continues to confuse the marketplace and lack transparency, in terms of the wide range of practices that can be behind the label. These can vary greatly, across what are considered "responsible sources", from SFI or CSA certified lands, to 100% pre-consumer materials, to SFI Fiber Sourcing. Beyond BMPs and using trained loggers, SFI Fiber sourcing standard is based wholly on outreach and education and does not provide assurances on even the most basic elements of responsible forestry (sustained yield, rare species conservation, sound silviculture, etc.), traceability, or avoidance of some controversial sources such as conversion. Current language: Sections 2, 3, and 4	Recommendation: SFI certified sourcing label requirements should be strengthened significantly or the label done away with entirely, as it is misleading in the marketplace to have a label that looks similar to other SFI labels, but the vast majority of fiber currently covered by it does not have any association with certified forest management fiber content.		2	SFI program is the only program that addresses sourcing from small, non-certified lands. The requirements of certified sourcing are directed at ensuring amongst other requirements the use of best management practices, promotion of conservation of biological diversity and where they are available the use of Qualified Logging Professionals. The SFI Certified Sourcing Label is clear in that it is not making a claim of certified content.	None

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The SFI Fiber Sourcing Label lacks basic transparency, in terms of the wide range of practices that can be behind the label. "Responsible sources", can range from fiber from SFI or CSA certified lands, to 100% pre-consumer materials, to materials derived from SFI Fiber Sourcing. As for the latter, beyond BMPs and using trained loggers, the SFI Fiber Sourcing standard is based wholly on outreach and education and does not provide assurances on many of the basic elements of responsible forestry (sustained yield, rare species conservation, sound silviculture, etc.) Recommendation: The SFI Certified Fiber Sourcing Label should be eliminated or strengthened significantly to address the issues in the parenthetical above; it is misleading in the marketplace to have a label that looks similar to other SFI labels, but does not require any association with content from certified forests.	The SFI Fiber Sourcing Label lacks basic transparency, in terms of the wide range of practices that can be behind the label. "Responsible sources", can range from fiber from SFI or CSA certified lands, to 100% pre-consumer materials, to materials derived from SFI Fiber Sourcing. As for the latter, beyond BMPs and using trained loggers, the SFI Fiber Sourcing standard is based wholly on outreach and education and does not provide assurances on many of the basic elements of responsible forestry (sustained yield, rare species conservation, sound silviculture, etc.) Recommendation: The SFI Certified Fiber Sourcing Label should be eliminated or strengthened significantly to address the issues in the parenthetical above; it is misleading in the marketplace to have a label that looks similar to other SFI labels, but does not require any association with content from certified forests.	Recommendation: The SFI Certified Fiber Sourcing Label should be eliminated or strengthened significantly to address the issues in the parenthetical above; it is misleading in the marketplace to have a label that looks similar to other SFI labels, but does not require any association with content from certified forests.	2	SFI program is the only program that addresses sourcing from small, non-certified lands. The requirements of certified sourcing are directed at ensuring amongst other requirements the use of best management practices, promotion of conservation of biological diversity and where they are available the use of Qualified Logging Professionals. The SFI Certified Sourcing Label is clear in that it is not making a claim of certified content.	None

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	The SFI's labeling and program materials deceptively imply independence from the wood products industry and the companies being certified. The term "initiative" in "Sustainable Forestry Initiative" and the lack of any reference to the wood products industry misleads consumers by implying that the SFI is independent and separate from the industry. Nor do the SFI's label and marketing materials disclose that the SFI's primary funding source is the forest products industry. Relevant SFI provisions: Problem runs throughout the labeling requirements and other SFI materials. ☐		2	General comment. No specific recommendations for change provided. In addition, the Task Group does not agree with the assertions which are false. There are numerous materials produced by SFI that are displayed publicly on the SFI website directly addressing these false assertions. Here is an example: http://www.sfiprogram.org/setting-the-record-straight/ The Sustainable Forestry Initiative® is an independent, nonprofit 501(c)3 organization that promotes sustainable forestry, improved best practices and responsible buying decisions. SFI Inc. is solely responsible for maintaining, overseeing and improving the internationally recognized SFI® program and SFI Standard. SFI Inc.'s 18-member board represents environmental, social and economic sectors equally to meet the many needs of forests and communities. The board members include representatives of public and private landowners, manufacturers of forest products, conservation groups, academia, aboriginal interests, community organizations and government officials. In addition, the SFI program is reviewed by the SFI External Review Panel, a distinguished group of independent experts representing conservation, professional, academic and public organizations. The SFI External Review Panel conducts an independent review of the SFI program for both objectivity and credibility and to ensure the annual SFI Progress Report fairly states the status of SFI program implementation. The volunteer panel provides external oversight through its independent review of the current SFI program and standard revision process while seeking steady improvements in responsible forestry practices. SFI Inc. is primarily supported financially by SFI Program Participants who use the program's forest management and fiber sourcing standards. These SFI Program Participants are listed on the SFI website (www.sfiprogram.org/files/pdf/SFIProgramParticipants.pdf) and include forest product and paper companies, conservation organizations, state and local public agencies, foundations, and universities. In 2012, SFI Program Participants provided 93 percent of the funding for SFI Inc., and the remaining seven percent came from annual conference revenue, various services agreements, investment income and other miscellaneous sources. SFI Program Participants are audited by independent certification bodies accredited by ANSI. SFI Inc. has no role in determining whether a certificate gets granted.	None

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The SFI "Certified Sourcing" label is deceptive and misleading, and likely to greenwash wood and fiber from environmentally and socially destructive sources in both North America and overseas. Because the label includes the name "Sustainable Forestry Initiative" and "certified," it implies that products bearing the label come from forests that are certified as sustainable. However, virtually no social or environmental protections consistently apply to products bearing this label, nor are the source forests generally required to be certified. Indeed, nearly all types and sources of environmentally and socially unacceptable sources in both North America and overseas can be used in products bearing this label. For primary producers, the Certified Sourcing label's core requirement is that 100% of the labeled products' primary sources content comes from "Certified Sourcing," i.e. fiber that meets Objectives 8-20 for Fiber Sourcing of the SFI Standard, pre-consumer recycled sources, post-consumer recycled content, "Certified Forest Content," or for sources outside of North America, "Non-Controversial Sources." In addition, as much as 50% of primary producers' inputs can be secondary sources, and it is unclear what requirements, if any, apply to these sources in this context. Certification of sources to the SFI Standard is only required in those cases where the source forest is land owned or controlled by the company using the label, and the land is "enrolled in the SFI program." For secondary producers, the core requirement is that 66% of the labeled products' content comes from forests that meet the SFI's "Certified Sourcing" requirements. As much as 33% can come from forests that only meet the SFI's "Controversial Sources" requirements. "Controversial Sources" are not even applicable to sourcing from within North America. Examples could include pulp from Indonesia's Asian Pulp and Paper, etc.				2	General comment. No specific recommendations for change provided. In addition, the Task Group does not agree with the assertions and the erroneous descriptions and conclusions regarding how the SFI labeling program works. There are numerous materials produced by SFI that are displayed publicly on the SFI website that clearly show how the labeling program works and the claims that are allowed and the rules for making the claims. All labels include the SFI website address. Here is an Example: http://www.sfiprogram.org/sfi-standard/labels-claims/ <u>Labels & Claims</u> The SFI program has on-product labels to help customers and consumers identify exactly what they are buying: three SFI chain of custody labels and one SFI certified sourcing label. • SFI chain of custody labels allow the use of fiber from certified forests, certified sourcing, and post-consumer recycled material. All of these terms are defined in the SFI Definitions (Section 13 of the SFI 2010-2014 Standard Requirements). Certified forest content can include fiber certified under the SFI 2010-2014 Standard (objectives for land management), Canadian Standards Association (CAN/CSA-Z809) and/or the American Tree Farm System (ATFS) individual and group certification. • The SFI certified sourcing label and claim do not make claims about certified forest content. Certified sourcing can include fiber sourced from a company that conforms with objectives 8-20 of Section 2 - SFI 2010-2014 Standard's fiber sourcing requirements, from pre or post consumer recycled content, or from a certified forest, and fiber sourced from non-controversial sources. Certified sourcing is a defined term in the SFI Definitions (Section 13 of the SFI 2010-2014 Standard Requirements). A note on label usage: Organizations that want to use SFI program labels must contact the SFI Office of Label Use and Licensing, which must approve the use of all SFI labels and claims.

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SECTION 5.					
RULES FOR USE OF SFI OFF-PRODUCT MARKS					
PREFACE					
no comment					
No comment					
No issues.					
1. SFI LICENSED WORD MARKS:* SUSTAINABLE FORESTRY INITIATIVE ®* SFI ®SFI Licensed Tagline Mark:* GOOD FOR YOU, GOOD FOR OUR FORESTS ®					
no commnet					
No comment					
2. SFI LICENSED LOGO MARKS - FOR CERTIFIED PROGRAM PARTICIPANTS SFI Licensed Logo Marks					
no comment					
No comment					

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9 - "Logo marks may not be used in advertisements…" We do not understand what this means. Is this correct? 11 - This says we must annually provide samples of the use of logo marks to the SFI label office. What does this requirement mean, and what is its purpose? The Label Office has approved all uses. Is this requirement correct?	9 – Clarity 11 - Clarity. Needed?	9 - Unknown 11 – Unknown			

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GUIDANCE TO SFI 2010-2014 STANDARD1. INTRODUCTION					
General Comment: The guidance section of the standard should be strengthened by expanding to include guidance regarding the: 1.intent of each of the objectives 2.minimal components and suggested components of any program referred to within the standard. 3.monitoring programs to ensure objectives are being met If, due to regional differences, it is problematic to provide meaningful guidance to program participants within the standard, perhaps regional implementation committees could develop their own guidance sections for each objective for reference to be accessed with the other fact sheets and extension materials available. We understand this is the purpose of regional implementation efforts but did not verify materials beyond the standard to confirm whether or not these written documents exist. We did not see these materials in the publicly available materials of the WCSIC but acknowledge these materials may be readily available to program participants via the member login.			2	Items identified as needing guidance (to assist with implementation of SFI forest managment, fiber sourcing, chain of custody or certifeid sourcing requiremtns) will be reviewed by the SFI Resources Committee. The RC will direct that new guidance be developed or revsions to existing guidance be developed as applicable.	
Maintain PEFC endorsement of the SFI forestry management standard.	As we seek to have consistent purchasing practices around the world, the PEFC endorsement system helps provide assurance of equivalence. Being endorsed by a recognized international standard supports the credibility of the entire SFI certification system.		2	SFI Inc will maintain endorsement of the SFI program forest manamgent requirements.	
Maintain PEFC endorsement.			2	SFI Inc will maintain endorsement of the SFI program forest manamgent requirements.	
No comment					
none					
2. OBJECTIVE 4: FORESTS WITH EXCEPTIONAL CONSERVATION VALUE					
no change needed					
No comment					
	Landscape level not achievable on purchased stumpage tracts and on other limited acreage ownerships.	Remove 'landscape level'.	2	The Task Group has proposed a new Objective 9 to address to biodiversity in fiber sourcing.	See new Objective 9 in Section 2 SFI 2015-2019.
3. OBJECTIVE 4: WILDLIFE HABITATS DIVERSITY AND INVASIVE EXOTIC PLANTS AND ANIMALS					

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Like the focus on habitat diversity, which landowners can directly influence, rather than animal diversity, which we can't. Interesting to note the reference to barred owl - USF&W Service apparently intends to treat this species as invasive.			3	General Comment	
i am having a hard time following this section through the survey format, but it seems that wildfire would need to be addressed here as well similar in other existing areas where forest health contains both wildfire and invasive pests.		Program participants should become knowledgeable of the wildfire risk within their area of operation and participate in efforts to redcue risk and proactively mitigate against risk... etc.	2	At the time of each SFI standard revision all aspects of the SFI Section 6 - Guidance are considered. Section 2 Objectives 16 and 17 has been revised to incorporate features addressing the topic of wildfire.	See proposed language for Indicators 16.1.1; 18.1.2;
Some of the information presented seems to be out of the potential influence of forest companies i.e. reference to North American deserts(?)			3	General Comment	
4. OBJECTIVE 9: CERTIFIED LOGGING PROFESSIONALS AND USE OF TRAINED LOGGERS					
Should replace the de minimis language in the guidance document with an actual percentage.	Reports indicate that 94% of fiber sourced is from trained loggers. That is a huge success and by requesting in the guidance document that at least 94% of the raw material is obtained from trained and/or certified logging professionals woould add credibility to the stadard.	Program participants will btain 94% of thier raw material from qualified logging professionals and certified logging professionals (where available) who have completed training programs. Minimal (6%) raw material will be allowed from other wood supliers.	2	Initial discussion of the topic of de minimis deliveries from untrained loggers has commenced and will continue into the second review period.	
Stardard should include Registered or Certified Forestry Professionals, with degrees from accredited universities.	Improve the standards of professinalizm of the Forest Managers. The managers of the Forest Resource should also be recognized as professional by being registered by the state or Certified by a Professinal Forestry Organization.	Add to the Profesinal Logger Requirements.	3	Registration or certification by a state or provincial forestry association or society though valuable does not in itself address the full suite of training requirements identified for SFI qualified logging professionals or qualified resource professionals.	
No comment					
Professional Logger Certification is a key element to the success of the SFI Program. We have a strong program here in Oregon and well connected to our SIC.			3	General Comment	

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SFI should further define the criteria to assess logger certification programs against.	Doing so will provide a base of minimum requirements to ensure the credibility of logger certification programs from state to state and the credibility of SFI. Not all logger certification programs are created equal and some are far less credible than others.	1.Logger Certification Standard shall be consistent with SFI standard and state or provincial BMPs. 2.Logger Certification 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	2	Initial discussion of the topic of logger training requirements and definitions of qualified and certified logging professionals has commenced and will continue into the second review period.	
5. OBJECTIVE 10: BEST MANAGEMENT PRACTICES MONITORING					
Best Management Practices to protect water quality are assured through implementation of the Oregon Forest Practices Act.			3	General Comment	
6. OBJECTIVE 11: BIODIVERSITY HOTSPOTS AND HIGH-BIODIVERSITY WILDERNESS AREAS					

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No proposed change. This objective recognizes that sustainable forestry is a global issue that SFI participants can exert a positive influence over.			3	General Comment	
These groups appear to be very extreme.	There is no need for changes in the language as long as conformance to the criteria for each of these groups is not mandatory.		3	General Comment	
Conservation International may have updated their Biodiversity Hotspots since 2002. These should be reviewed. They may now be called Key Biodiversity Areas (KBA's)			2	Review of the CI website confirms that the term biodiversity hotspots is still in use. However, the list of hotspots will need to be reviewed to confirm the most current listing.	
7. SFI CERTIFICATION AND ALTERNATIVE MARKETS					
No change suggested. I think SFI is right where it should be at this stage of discussions over climate change and carbon sequestration.			3	General Comment	
SFI needs to remove the references to Bioenergy Feedstocks. It is irrelevant what the end us of the wood is. SFI needs to accomodate short rotation intensive culture and provide a way for all wood products to be considered SFI Certified.			2	The term bioenergy feedstocks has been removed from the proposed draft Section 2 of the SFI 2015-2019 requirements.	
8. ILO CORE CONVENTIONS					
Review ILO Core Convention requirements for conformance with U.S. and Canadian law.	Recent legal review by a number of companies indicated significant potential legal issues with compliance to some of the Core Conventions.		2	SFI Inc. conducts periodic legal reviews of it program requirements against developments in American and Canadian federal, state/provincial laws as well as international legislation. The current SFI program requirements in Section 2 SFI 2010-2014 Objective 14 Legal and Regulatory Compliance are intended to meet the intent of the ILO Core Conventions 87, 98 and 111.	
9. SFI IMPLEMENTATION COMMITTEES					
No proposed change. We have an active and informed SIC here in Oregon.			3	General Comment	
Performance measures 15.1.1 and 17.1.1 both indicate that program participants should participate in and provide funding for the SIC's.	MWV believes strongly in the SIC's and their value to the SFI program. However, we are also hearing that the funding requirement for SIC participation is a barrier to entry for smaller landowners and mills.	Revisit the requirement for participants to provide funding to the SCI. Is there a way to maintain the viability of the SIC's while removing the financial barrier to participation for smaller landowners/facilities?	2	As per the SIC Guidance document each local SIC determines the proper funding mechanism. Furthermore, "local" SIC members should define "support" expectations for SIC members. "support" may not necessarily be financial and can include in-kind support.	

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Length of re-certification cycle.	During the last standard revision the re-certification cycle was reduced from 5 years to 3 years (Section 9, 5.5). At the time some program participants expressed concern that this would place SFI at a competitive disadvantage against standards that re-certified on a 5 year cycle, due to potential cost and efficiency impacts.	SFI to determine whether the move to a 3 year re-certification cycle has impacted either retention or recruitment of SFI Program Participants. Provide program participants with justification as to why the re-certification cycle should not be moved to 5 years.	2	SFI is working with the relevant organizations to explore what it can do to move its Section 2 standard to a 5 year certification cycle.	

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SECTION 7.					
SFI LEGALITY REQUIREMENTS AND POLICIES FOR AVOIDANCE OF ILLEGAL LOGGING					
na					
No comment					
No proposed change.					
Section 12 should include a due diligence system for material harvested in North America.			2	Comment addressed with new Indicator in Section 2 – 15.1.4.	15.1.4 has additional requirements that address assessing the potential of sourcing from illegal logging from within the United States and Canada. Indicator requires a process to assess the risk of acquiring material from illegal logging by considering some of the following: i) communications with suppliers; ii) independent research; iii) contract documentation; and iv) records. Performance Measure 15.1 requires a program to address any significant risk identified under Indicator 15.1.4.
The controversial sources definition states that controversial sources are not allowed in SFI-labeled products. This is not all-inclusive, as many SFI certified products are not labeled.	Correction to conform to the intent of the definition.	Use of controversial sources is not allowed in SFI-certified products.	2	Comment addressed with revised definition of controversial sources.	See Section 13 of draft SFI 2015-2019 for revised definition of controversial sources.

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SECTION 8.					
SFI STANDARD DEVELOPMENT AND INTERPRETATIONS PROCESS					
Begin a process for evaluating what constitutes a sustainable use of biotech trees.	Biotech trees (also called transgenic or genetically modified) are being developed in the U.S., Canada, and many other countries around the world. Their intended purpose range from species restoration, to commercial cellulose production, to food products. While no biotech tree other than the papaya is commercially available in the U.S. or Canada, more biotech trees are being actively researched. For example, the Forest Health Initiative is investigating the role of biotechnology to address some of today's most pressing forest health challenges. The test trees, some of which are biotech American chestnuts, create a unique opportunity to discuss many of the social, environmental, and economic issues that surround biotech trees. Beginning a process that engages stakeholders in discussions about how these trees can be used responsibly can be a useful approach. We encourage the SFI to begin similar processes in an effort to further inform this review process.	NA	2	SFI Inc has assembled the Bioenergy and Climate Change Task Group. One of its focus areas is the topic of short rotation crops. The task group reviewed all comments related to bioenergy and climate change and these responses can be found in the responses in Section 2.	See Section 2 responses for Objectives 16.
na					
No comment					
No proposed change					

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"SFI has a chance to clarify, avoid arbitrary counterproductive rules, increase credibility, and make the Standard more user-friendly in the face of a competing system that seems bent on self-destruction. Finally, SFI interpretations could be clearer, and SFI staff should be encouraged to not provide informal interpretations that are not formally and publically available to all users of the Standard including, in particular, whether or not there is an actual "de minimis" amount of fiber that may come from a facility's own lands without the application of Objectives 1-7. "			2	At the time of each SFI standard revision all aspects of the SFI program are considered. Interpretations are reviewed for incorporation into the the normative language as appropriate. All requests for official interpretations are submittd to SFI Inc and are reviewed by the SFI Interpretations Committee. The committee has 45 days to issue the interpretation. Official Interpretations are posted to the SFI Inc website at: http://www.sfiprogram.org/linkservid/52543F88-99FB-F177-CCB48558195E3CFA/showMeta/0/	

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SECTION 9.					
SFI 2010-2014 AUDIT PROCEDURES AND AUDITOR QUALIFICATIONS AND ACCREDITATION					
Comment	Rationale for proposed change	Proposed new language			
4.1.2 V. Appendix 1. Multisite	Requirements for internal audit programs should be located and easily found in the individual standards, not here in an Appendix. Some audit firms are using this to require internal audit programs for each of the relevant standards. Too costly to maintain 3 separate internal audit programs. Desn't add value to a mature system.	maintain an internal audit sampling system to monitor..... BUT LOCATE IN EACH STANDARD	2	At the time of each SFI standard revision all aspects of the SFI program are considered. Requirements for public reporting will be one of those items considered for review.	
Audit reports need to show how the participant is meeting each objective, and compare that with how the participant said they would address that particular objective.			2	At the time of each SFI standard revision all aspects of the SFI program are considered. Requirements for SFI technical audit report will be one of those items considered for review.	
In Section 5.5 Recertification, I propose changing the program participant recertification to every five years.	The current three year term has increased audit costs alone by 7%.This does not include the increased staff time required to prepare for a full SFI recertification audit versus a surveillance audit. This is one way to help program participants control their certification costs while still maintaining the integrity of the participant's certificate and the SFI Standard.	5.5. Recertification To maintain a current SFI certificate, Program Participants shall recertify their SFI programs to the SFI Standard every five years.	2	SFI is working with the relevant organizations to explore what it can do to move its Section 2 standard to a 5 year certification cycle.	
na					
No comment					
No proposed change					

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On public lands with indigenous peoples traditional lands certification and re-certiifcation audits can occur without affected indigenous peoples being contacted during the course of the audit.	Need to formalize the need to communicate, or show evidence of attempts to communicate, with affected Indigenous Peoples at least once during the certification cycle.	5.3. Determination of Conformance: .....Evidence shall be compiled by examining operating procedures, materials relating to forestry practices and on-the ground field performance, and through meetings with employees, contractors, and other third parties (e.g., government agencies, community groups, conservation organizations), as appropriate, to determine conformance to the SFI 2010-2014 Standard. For certification audits on public lands certification bodies must show evidence of communication with affected Indigenous peoples at least once during the certification cycle. These communications shall document the certification body's efforts to gauge the awareness of the affected Indigenous Peoples of the Program Participant's forest management activities on their traditional lands.	2	At the time of each SFI standard revision all aspects of the SFI program are considered. Requirements for public reporting will be one of those items considered for review.	
Section 5.5 that requires full recertification should be changed back to a 5 year interval instead of the 3 year time frame.	SFI should be consistent with recertification of other major certification systems (e.g. FSC). Our program is audited jointly with FSC by the same certifying body. It would be much simpler to have all the full recertifications done at the same time frame with surveillance audits in between.		2	SFI is working with the relevant organizations to explore what it can do to move its Section 2 standard to a 5 year certification cycle.	
Section 5.5. Recertification -lengthen time frame Appendix 1, Introduction - revise wording	Recertification period is unnecessarily demanding. "In some cases" wording is too restrictive.	To maintain a current SFI certificate, Program Participants shall recertify their SFI programs to the SFI Standard every five years. Multi-site organizations may be audited on a site-by-site basis (all sites visited each year) or, where eligible, on a sample basis.	2	SFI is working with the relevant organizations to explore what it can do to move its Section 2 standard to a 5 year certification cycle.	

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The section on Multi-sites needs to be more prevalent and not burried way back here in the section on auditing.			2	At the time of each SFI standard revision all aspects of the SFI program are considered. Requirements for public reporting will be one of those items considered for review.	

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SECTION 10.					
COMMUNICATIONS AND PUBLIC REPORTING					
PREPARING AND SUBMITTING A PUBLIC REPORT					
Each objective should be reviewed and reported on in each audit. I had a concern, but, reading an audit , couldn't find where the objective related to that concern was even looked at.	Each objective should have individual response in the audit.	add: the audit report shall include a summary of findings categorized by objective	2	At the time of each SFI standard revision all aspects of the SFI program are considered. Requirements for public reporting will be one of those items considered for review.	
na					
No comment					
No proposed change					
Reporting: SFI Public Summaries continue to provide very little information about the audit findings. Essential components of a typical audit report should include evidence of conformity/nonconformity, which provides basic transparency for credible certification systems.	For basic transparency, public summaries should include the evidence of conformity/nonconformity. See Governance above for complementary recommendations to strengthen transparency in reporting.		2	At the time of each SFI standard revision all aspects of the SFI program are considered. Requirements for public reporting will be one of those items considered for review.	
SFI Public Summaries continue to provide very little information about the audit findings. Essential components of a typical audit report should include evidence of conformity/nonconformity, which provides basic transparency for credible certification systems.	Essential components of a typical audit report should include evidence of conformity/nonconformity, which provides basic transparency for credible certification systems.	Recommendation: For basic transparency, public summaries should include the evidence of conformity/nonconformity. See Governance above for complementary recommendations to strengthen transparency in reporting.	2	Section 10 does have a requirement a summary of the findings, including general descriptions of evidence of conformity and any. At the time of each SFI standard revision all aspects of the SFI program are considered. Requirements for public reporting will be one of those items considered for review. nonconformities and corrective action plans to address them, opportunities for improvement, and exceptional practices.	

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SECTION 11. PUBLIC INQUIRIES AND OFFICIAL COMPLAINTS					
A person with a concern should not be directed to the program participant. I have a concern, but because of fear of retribution, did not report the concern to the program participant. How does the public know if a practice is "nonconforming" if they have no access to a program participants individual SFI plan?? I am currently investigating concerns, but cannot find what is in a plan without approaching the participant company and I fear retribution, black-listing etc. The system is not transparent. I should be able to go online and read what an individual participant said they would or wouldn't do to see for myself if a non-conformity exists. The Standard is more concerned about how their label is used, than full disclosure of on-the-ground practices by participants.	Fear of retribution (especially in less developed countries) will prevent concerned citizens or groups from directing questions to Program participants. Concerns should go to a third party, and all plans should be available on-line for full transparency.	The public should have a third party investigate complaints. Program participant SFI certified practices and plans must be made available to the public online. Only then can Nonconformities be readily identified and investigated in a transparent manner.	2	The annual third-party audit for certified program participant assesses the status of any investigations regarding non-conforming practices with respect to the SFI standard. The comment's rationale for proposed change appears to infer SFI standard implementation in less developed countries: SFI program requirements are for use in the United States and Canada only.	None
na					
No comment					
No proposed change					

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Sequence of events for resolving public complaints needs to be clarified.	Text makes it sound as if the SIC is the last body brought into the process for resolving a complaint. In fact it should be the second body to review if, after the Program Participant conducts its review and issues its response, the complaint is still not satisfied.	1. PUBLIC INQUIRIES REGARDING INCONSISTENT PRACTICES..... The complainant shall present specific claims of nonconformity 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 certification body for its review at the next scheduled audit. The certification body 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 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 Program Participants certification body and the appropriate SFI Implementation Committee Inconsistent Practices Program. The SFI Implementation Committee Inconsistent Practices Program 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 the Program Participant, the complainant and the applicable certification body.	2	The final body to review a complaint regarding inconsistent practices is the SFI National Inconsistent Practice office via the External Review Panel. This review is at a level above that of the SFI Implementation Committee. In addition to review by the SIC or National Office, the annual third-party audit will review the status of any outstanding complaints of inconsistent practices.	

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SECTION 12. OPTIONAL MODULES					
A good placeholder for new and emerging opportunities, but telling that there have been no modules yet developed here.			3	Editorial Comment	None
Consider a Module for afforestation of non-forested landscapes to short rotation intensive culture. Incorporate other intensive culture into the body of the SFI Standard (Section 2).			2	SFI Inc has assembled the Bioenergy and Climate Change Task Group. One of its focus areas is the topic of short rotation crops. The task group reviewed all comments related to bioenergy and climate change and these responses can be found in the responses in Section 2.	See Section 2 responses for Objectives 16.
na					
No comment					

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SFI needs to consider a module to address the production and sourcing of wood for bioenergy within the context of traditional forestry operations, which also addresses the carbon management implications and global requirements for bioenergy production from wood. Currently, the largest users of wood energy are utilities in the EU, and a large proportion of their feedstocks are produced in the southeast US. As such, the producers of wood energy feedstocks in the US must meet the applicable legislation related to bioenergy, which at this time is the Renewable Energy Directive (RED). While the RED is currently in flux, we do know that regardless of how certified and non-certified fiber are ultimately treated, we will have to have some sort of process in place that verifies not only that the non-certified fiber comes from responsible sources, but that all fiber comes from operations that do not contribute to increased carbon in the atmosphere. While SFI Forest Management and Fiber Sourcing requirements address issues related to forest management and responsible fiber procurement, these standards do not inherently address how operations can positively or negatively address carbon sequestration. Companies that are replacing conventional energy production with wood bioenergy must ensure that their energy production, from forest to final use, is resulting in carbon emission reductions. Thus, harvesting and management activities that may be considered neutral from a forest management standpoint, like small scale forest conversion, may actually have negative consequences when you need to address carbon implications. SFI has an opportunity to lead the market in creating optional requirements that support carbon management, and also meet the RED. In addition to creating a module that addresses how operations affect carbon emissions, SFI is also uniquely situated to support data collection for companies to use when modeling their GHG footprints. As carbon models become more sophisticated, companies have greater data needs to ensure that the model accurately reflects their operational context. Currently, no data source exists for companies to properly model the GHG emissions of things like site prep activities, harvesting and in-woods chipping, and fertilizer and chemical use, at a regional scale, and per ownership type. SFI along with its partner organizations, like the American Tree Farm System, has access to numerous sources to coordinate data collection that would allow all forestry companies to access data that accurately reflects the GHG emissions associated with their operations. NCASI has maintained a survey on chemical use and would be a natural partner to broaden that effort and to maintain data over time for companies to use.	While many safeguards, including SFI, and US law exist to ensure proper forest management, there is no verifiable system for companies to show that their forest management or fiber sourcing activities are not negatively impacting carbon emissions. Because only SFI has the fiber sourcing requirements, in addition to a widely used forest management standard, the SFI program is well-poised to fill thus need.	To create a module, SFI would have to convene a standard development process, so specific language is not proposed here. However, it is necessary that any module address the following components: •Maintenance or improvement of carbon storage capacity, including: oNot sourcing from forests being converted to non-forest oNo conversion or draining of wetlands and peatlands, and protection of the soil carbon capacity during harvest oNo use of stumps or roots in bioenergy production oNot sourcing from previously un-managed forests or protected areas •Proper merchandising to ensure saw logs and other high value fiber is not used for bioenergy production •Provides management guidance for landowners that want to support carbon sequestration while also managing forests for production •Other items as identified, that help verify improved GHG emissions when sourcing wood for bioenergy production	2	SFI Inc has assembled the Bioenergy and Climate Change Task Group. One of its focus areas is the topic of short rotation crops. The task group reviewed all comments related to bioenergy and climate change and these responses can be found in the responses in Section 2.	See Section 2 responses.

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SECTION 13.					
afforestation: The establishment of a forest or stand in an area where the preceding vegetation or land use was not forest.					
Under this definition would afforestation also apply to a area that is rehabilitated some years after a reforestation failure?			2	No - regeneration after reforestation failure would not constitute afforestation.	None
Alliance for Zero Extinction: A global initiative of biodiversity conservation organizations, which aims to prevent extinctions by identifying and safeguarding key sites where species are in imminent danger of disappearing. The goal of the Alliance is to create a front line of defense against extinction by eliminating threats and restoring habitat to allow species populations to rebound.					
A pretty ambitious goal considering some amount of extinction is unavoidable. Does the Alliance have a defense plan for			3	General Comment	None
American Tree Farm System®: A national program that promotes the sustainable management of forests through education and outreach to private forest landowners.					
Need to add a sentence indicating, as in the body of the text, that ATFS certified property is recognized meeting SFI standards	Most private lands will be certified through ATFS. It is critical that private landowners have this certification opportunity, providing ATFS retains the 3rd party certification process in areas where markets for certified wood are strong, such as the US South.	Effective July 1, 2004, ATFS evolved into a credible, third party certification system, geared for smaller ownerships. Wood from ATFS lands are recognized as meeting SFI certification standards.	2	This is already defined in the definition of acceptable standards.	None

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auditor: A person with the competence to conduct an audit (ISO 19011:2002, 3.8).					
Shouldn't the definition include "training and certification", in addition to "competence"?			2`	This definition is taken directly from ISO 19011:2008).	None
best management practices (BMPs): A practice or combination of practices for protection of water quality 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.					
BMPs here in Oregon apply to protection of soil and air quality, as well as water quality. Soil protection is key to sustaining forest productivity and air protection is key (along with water) to sustaining public acceptance of forest management.	The definition of BMPs should be broadened.	"A practice or combination of practices developed for the protection of water, soil and air resources that is..."	2	The definition of best management practices when used in the SFI standard is linked to protection of water quality.	None

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BMP's should not be limited to water quality only. BMP's are not absolute requirements that are followed 100% of the time. Legislation is absolute and to be adhered to 100% of the time. (for example, BMP may state to design skidding routes to minimize new roads, but adverse terrain may require different skidding trails resulting in more roads but with less potential for erosion)	Eliminate 'water quality' to be more inclusive of other forest management issues. Make distinction to allow instances of not following BMP's allowed without being a non-conformance.	A practice or combination of practices for protection of forest resources 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. BMP's should be followed as a general rule; however, site specific conditions may necessitate the use of alternative methods while still protecting the desired values.	2	BMPs are defined as practices directed at protection of water quality as per the Clean Water Act.	None

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	The definition of BMP needs to be more inclusive of practices to protect water quality and water quantity but also forest productivity, soils and biodiversity and needs to include BMPs developed internally (company and/or industry let) and externally (NGOs and/or government led).	best management practices (BMPs): A practice or combination of practices for protection of water quality and quantity, and forest productivity, soils, and biodiversity, that is determined by a federal, provincial, state, or local government or other responsible entity, or that is developed by industry or other stakeholders and that is accepted by industry as a BMP, 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.	2	BMPs are defined as practices directed at protection of water quality as per the Clean Water Act.	None
Some naturalized species, Norway maple for example, are	To differentiate between invasive and non-	New sentence following "population.":	2	The fact that a species may be naturalized	None
bioenergy feedstock: Biomass used for the production of renewable energy. Biomass includes any organic products and by-products derived from trees, plants and other biological organic matter, including limbs,					
Remove this definition. It is not relevant to the SFI and only creates divisions.			2	Task group disagrees with the comment. SFI continues to monitor development regarding bioenergy so the current definition is necessary.	None

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No recommendations. Just a comment that this definition be broad to include a wide variety of biomass products as suitable.	Some people oppose the use of whole trees, despite the need to thin stands and the overabundance of lower value timber relative to existing markets. Biomass is a perfect use for thinned trees under such circumstances.		3	General Comment in support of existing definition.	None
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.					
Where are people?		Include people in diversity.	2	Definition is intended to address flora and fauna.	None
certified content: Raw material that can count towards the calculation of certified content percentages in chain-of-custody tracking. Below are the acceptable certified content sources. certified forest content: Raw material from lands third-party certified to acceptable forest management standards. acceptable forest management standards: These standards are all endorsed in North America by the Program for the Endorsement of Forest Certification schemes (PEFC). - SFI 2010-2014 Standard (objectives for land management) - Canadian Standards Association (CAN/CSA-Z809) - American Tree Farm System (ATFS) individual and group certification post-consumer recycled content: Material generated by households or by commercial, industrial and institutional facilities in their role as end-users of the product, which can no longer be used for its intended purpose. Post-consumer recycled content can count towards the calculation of certified content percentages but must always be communicated as post-consumer recycled content and not certified forest content. Any claims about post-consumer recycled content by Program Participants and label users shall be accurate and consistent with applicable law. Program Participants and label users 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.					
Include Pre-consumer recycled content as eligible as Certified Content. Need a volume credit account for all certified content inputs.			2	Definition of certified content has been revised to include pre-consumer recycled under the definition of SFI certified content.	See proposed definition for carried content.

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SFI needs to adopt the ISO definition of recycled material.	Globally the ISO definition is accepted. In the paper packaging industry, post industrial waste essentially meets the EPA definition on meeting the intended use of a material. Plant trim waste that is collected and shipped to a different facility i.e. a paper mill is indeed post consumer waste to a mill when the consumer is the packaging converting facility.	Forest based material that is (a) diverted from the waste stream during a manufacturing process. Excluded is reutilization of materials such as rework, regrind or scrap generated in a process and capable of being reclaimed within the same process that generated it. Excluded are by-products such as sawmilling by-products (sawdust, chips, bark, etc.) or forestry residues (bark, chips from branches, roots, etc.) as they do not represent "waste stream". and (b) Generated by households or by commercial, industrial and institutional facilities in their role as end-users of the product which can no longer be used for its intended purpose. This includes returns of material from the distribution chain.	2	The current definition of recycled content is based on the ISO definition.	None
certified logging professional: A qualified logging professional who has successfully completed and is a member in good standing, of a credible logger certification program recognized by the SFI Implementation Committee.					
Needs clarification and to be more specific.	Clarification	certified logging professional: A qualified	2	This suggested revision will be considered by	

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add criteria for what constitutes a credible logger certification program. Need to add incentive within the Standard and COC process and labeling to recognize or provide incentives for use of certified loggers.			2	This suggested revision will be considered by the Task Group in the second review period.	
Wrongly implies that this is a person/individual, rather than a business entity or organization.	It is simply uncustomary, discriminatory and costly to not recognize the wood producer as an organization--just as SFI does for participants. SFI does not require every participant employee to be "trained" or certified (see 'certified program participant'); it's unreasonable to expect wood producers to "train," as you require, the producer's "persons."	an organization, business or person...	2	This suggested revision will be considered by the Task Group in the second review period.	
certified Program Participant: 1. A forest landowner, forest land manager, primary or secondary forest products producer operating in the United States or Canada who participates in the SFI program through a contractual agreement to abide by the SFI 2010-2014 Standard, and who has been certified by an accredited SFI certification body to be in conformance with the SFI 2010-2014 Standard. 2. An organization that has been certified by an accredited SFI certification body to be in conformance with the SFI Chain-of Custody Standard and associated labels (Sections 3 and 4).					

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Clarify the term Program Participant within the standard.	The terms certified Program Participant and Program Participant are defined on pages 2 and 7 of Section 13. The last sentence of the definition of Program Participant states that "Program Participants cannot use the SFI on-product label or make claims their products are certified". This has the potential for significant confusion as Program Participant is the term most commonly used throughout the standard and in general conversation.	SFI should limit the use of the term Program Participant to those organizations that have undergone a third-party audit and are certified. Use of the term should be reviewed and modified, as appropriate, throughout the standard and accompanying sections.	2	Comment addressed by new definition of certified program participant.	See new definition for certified program participant.
controversial sources: Use of controversial sources are not allowed in SFI-labeled products. Controversial sources include illegal logging and fiber sourced from areas without effective social laws. Illegal logging: The theft of timber or logs and cutting in parks, reserves or other similar areas where otherwise precluded by laws such as the United States Lacey Act, as amended in 2008 (The Food, Conservation, and Energy Act of 2008 (Pulp. 110-234, 122 Stat. 923, enacted May 22, 2008, H.R. 2419, Section 8204. Prevention of Illegal Logging Practices, also known as the 2008 U.S. Farm Bill). The Lacey Act also makes it unlawful to conduct these activities with respect to any plant (1) without payment of appropriate royalties, taxes, or stumpage fees required for the plant by any law or regulations of any State or any foreign country and (2) in violation of any limitation under any law or regulation of any Sate, or under any foreign law, governing the export or transshipment of plants. SFI has not included these prohibitions in its definition of illegal logging because they are covered by the requirement to comply with all applicable laws.). The Act combats trafficking in ''illegal'' wildlife, fish, and plants. As of May 22, 2008, the Lacey Act makes it unlawful to import, export, transport, sell, receive, acquire, or purchase in interstate or foreign commerce any plant, with some limited exceptions, taken, possessed, transported or sold in violation of the laws of the United States, a State, an					

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Occasionally harvesting inadvertently occurs across planned harvest lines. While companies should have systems in placed to prevent this, it may still happen. If the company rectifies the situation by notifying authorities it should not jeopardize CoC by default.	By this definition, if a company accidently harvests in a park adjacent to a planned cutblocks, the wood is illegal, and all fibre not physically separated from that fibre would not available for product labels. If the company 'owns' up the to harvesting in the park, pays fines, stumpage etc. it would be a non-compliance issue, but should not be classified as illegally logged.	The theft of timber or logs and intentional cutting in parks, reserves or other similar areas where otherwise precluded by laws such as the United States Lacey Act....	2	Accidental harvest of timber outside a harvest unit (trespass) is not considered illegal logging. However, certified program participants should identify this timber for the purposes of Chain of Custody.	None
conversion sources: Roundwood and/or chips produced from conversion of forestland to other land uses. Manufacturers can use this wood to avoid wasting it but cannot include it when calculating certified forest content component.					
The bioenergy Task Group needs to use this definition of conversion, which is land use change. Conversion is not going from one species of trees to another.			2	Comment addressed with proposed language for Performance Measure 1.2.	See proposed language in SFI Section 2, Performance Measure 1.2.

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The issue of conversion frequently comes up in discussions with customers and ENGO's and the 2010-2014 Standard does not articulate SFI's position on conversion clearly; information is scattered between the standard, definitions and interpretations.	•The SFI definition of "conversion sources" notes that roundwood or chips from conversion of forestland to other land uses can be used by manufacturers to avoid wasting it, but it cannot be included when calculating the certified forest content component. This information needs to be part of a performance measure or indicator to be useful to practitioners.	The standard should be revised to address the conversion issue directly. Program participants should be able to find information on how to address conversion in performance measures/indicators, not interpretations/definitions.	2	Conversion is now addressed in Objective 1.	See proposed Performance Measures 1.2 and 1.3.
direct supplier: An individual or organization with whom a Program Participant has a direct contractual relationship for fiber sourcing.					
If this is only relevant to sourcing from outside of North America, it should say so. Otherwise, it is a confusing definition.			2	Use of term direct suppliers is only used Section 2 Objectives applicable to fiber sourcing outside the United States and Canada Draft Objectives 12-14).	None
ecosystem services: Components of nature, directly enjoyed, consumed, or used to yield human well-being.					
I am seeing double!			3	General Comment	None
exotic tree species: A tree species introduced from outside its natural range. This does not include species that have become naturalized in an 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.)					

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I am unsure why the 2nd sentence is needed. Suggest deleting *unless* there is a rationale that I'm unaware of.	Even if a tree is naturalized (Japanese tallow tree in the Gulf Coastal Plain), it is still exotic. I'm unsure why a species becoming naturalized would make it a "native" species (as opposed to exotic).		2	To be considered during he second review period.	
fiber sourcing:					
"Language about "fiber sourcing" is highly variable through the Standard and in actual use, with only "fiber sourcing" & "responsible fiber sources" in the Definitions, and with a label called "Certified Fiber Sourcing". If these terms mean different things, they should each be defined; if they mean the same thing, only on such term should be used. All in all, confusing about fiber sourcing creates difficulties for SFI COC certificate holders and even gives the impression that SFI is trying to "pull a fast one" with its fiber sourcing provisions. (It does not help that rules for SFI fiber sourcing are lumped into the section (4) of the Standard dealing with label use.) Note: • "fiber sourcing objectives" is italicized on page 3 of Section 1 of the Standard, but does not appear in the Definitions. • "responsible fiber sourcing" is italicized on page 1 of Sections 3, 4, & 5 of the Standard, but this term does not appear in the Definitions. • Under 1.1 of Section 4 of the Standard, the term "SFI Certified Fiber sourcing on-product label" is used, but the label actually says "SFI Certified Fiber Sourcing" (the "s" is capitalized) and "Fiber sourcing" does not appear in the Definitions. (Similarly, in 3.4 & elsewhere, "Certified Fiber sourcing Label" is used.) On page 3 of Section 1, the Standard says "Fiber sourcing labels do not make claims about certified forest content but they do make claims about certified fiber sourcing practices for procured wood fiber", but many opportunities are lost for SFI COC certificate holders to use unlabeled materials from certified fiber sourcing systems because: 1. there is little appreciation for the fact that a facility might hold a fiber sourcing certificate for their roundwood sourcing system with no guarantee that the certifying body would or should check to ensure that (e.g.) no market pulp of uncertain origin is being added to the process, especially since the definition of "fiber sourcing" does not include pulp. 2. the Standard does not include a provision for certified-fiber-sourcing producers to tell customers about the certified nature of their materials, and 3. some certified producers claim to believe that they may not			2	Comment identifies terms in italics which do not have corresponding definitions. Task group to review to determine if these terms require definition.	

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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.					
Yeah, I don't have a good working definition of "forest health", either!			2	General Comment	None
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.					
I suggest deleting "creating" from the definition and just go with "managing, using and conserving forests".	We plant trees, but we don't create forests.		2	This definition has been in the standard for prior versions and has not proved to be an issue.	None
green-up requirement: Previously clearcut harvest areas must have trees at least 3 years old or 5 feet (1.5 meters) high at the desired level of stocking before adjacent areas are clearcut.					
This definition seems too specific to be widely applicable.		Previously clearcut harvest areas must meet some minimal level of free to grow reforestation before adjacent areas can be clearcut.	2	The definition has to date proved to be implementable for those jurisdiction where legal requirements do not prescribe different parameters.	None
invasive exotic plants and animals: Species introduced from another country or geographic region outside its natural range that may have fewer natural population controls in the new environment, becoming a pest or nuisance species.					
		"...becoming a pest or nuisance species, harmful to species native to the area".	2	This definition has been in the standard for prior versions and has not proved to be an issue.	None
native: Species of ecological communities occurring naturally in an area, as neither a direct or indirect consequence of recent human activity.					

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Please see my comment under "exotic tree species" pertaining to naturalized species. I like this current definition of "native."	I would note that there is not definition for "naturalized tree species" though you do have definitions for both "native" and "exotic" species.	I propose using the 2nd sentence under "exotic tree species" as a definition for "naturalized tree species," and add this to the definitions.	2	To be considered during he second review period.	
neutral sources: Raw material that is not counted towards or against the calculation of the certified content percentages in chain-of- custody tracking or certified sourcing tracking in SFI Sections 3 and 4. Below are the acceptable neutral sources. Agricultural products (e.g. cotton or other non-wood fibers and biomass from wood fiber legally classified as agricultural by state, provincial or local government) and agricultural residues.					
This should include pre-consumer recycled content also. The		All reclaimed material may be tracked as	2	Comment addressed with proposed	See proposed definition of neutral sources.
non-forested 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.					
A transitional area between aquatic and terrestrial ecosystems is also the definition for a riparian area. We suggest this definition be modified and that new definitions for "riparian area" and "wetland" be added	Our proposed definition better distinguishes the term riparian from the term wetland while remaining true to the intent of the original definition used. the use of terms like tree-cover and non-forested is also ambiguous.	non-forested wetland: wetlands that do not have commercially viable timber including bogs, fens, shrub swamps, marshes and shallow open water (vernal pools).	2	Task Group has proposed definitions for riparian area and wetlands which are currently not defined in Section 13. Revision of the non-forested wetlands definition to be considered doing the second review period.	See proposed definition of riparian area and wetlands.

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other credible chain-of-custody standards: Standards capable of tracking fiber back to a forest certified to the SFI 2010-2014 Standard or other acceptable standards recognized by the SFI program. They include:- Program for the Endorsement of Forest Certification schemes (PEFC) Chain of Custody of Forest Based Products Requirements,					
Update to new standard. Should include ATFS and CSA.			3	Neither ATFS or CSA maintain an acceptable chain of custody standard.	None
program participant: A forest landowner, forest land manager, primary or secondary forest products producer operating in the United States or Canada who participates in the SFI program through a contractual agreement to abide by the SFI 2010-2014 Standard. Program Participants cannot use the SFI on-product label or make claims their products are certified.					
Clarify the term Program Participant.	The terms certified Program Participant and Program Participant are defined on pages 2 and 7 of Section 13. The last sentence of the definition of Program Participant states that "Program Participants cannot use the SFI on-product label or make claims their products are certified". This has the potential for significant confusion as Program Participant is the term most commonly used throughout the standard and in general conversation.	SFI should limit the use of the term Program Participant to those organizations that have undergone a third-party audit and are certified. Use of the term should be reviewed and modified, as appropriate, throughout the standard and accompanying sections.	2	Comment addressed by new definition of certified program participant.	See definition of certified program participants.

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This is miss-leading, the PP can use label if also SFI CoC certified.	Change working to clarify who can use on-product labels.	A forest landowner, forest land manager, primary or secondary forest products producer operating in the United States or Canada who participates in the SFI program through a contractual agreement to abide by the SFI 2010-2014 Standard. Program Participants cannot use the SFI on-product label or make claims their products are certified unless also SFI Chain of Custody Certified.	2	Comment addressed by new definition of certified program participants. This classification of SFI program member was approved by the SFI Board of Directors in December 2013.	See definition of certified program participants.
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					
differentiate this from certified logging professional. Many			2	the current standard does have definitions	None

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Much needed clarification for the role of a foremen for multiple crews. This should be allowed to include a forester for a sawmill overseeing contract crews on company purchased stumpage.	The sawmill bears the responsibility and liability for environmental compliance. The training requirement should rest with them.		2	Task Group to study this definition (Qualified Logging Professional) further during the second comment period.	
Wrongly defines that this is a person/individual, rather than a business entity or organization. Item a. This backwards requirement again discriminates against the professional forest company by dictating what comprises a "crew." SFI folk are naïve to present the facade that you understand who, how and where education and supervision best performs in more than 30 states and provinces. If it were not so condescending and illogical, it would be tempting to ignore this persistent SFI dictate. Dis the standard writers ever consider that many forestry workers work alone, many projects comprise different assemblies of workers and subcontractors daily, and that different sub-units of projects entail rotating numbers of professionals in various juxtapositions. Who is supposed to keep track of these so-called "crews" and their certified trained completed direction? Why does SFI feel inclined to dictate this "crew" nonsense? This would be better left to the state SICs, or simply redefined on a company basis. Item b. This gibberish has no place in the SFI Standard. Too many vagaries, presumptions, and details better left to the state SIC and the state professional logger program. Please refer to the program as professional logger program, rather than logger training. ...several years to carry out...individual's commitment...offered in a given year...available components...completed... is all this helpful? No.	It is simply uncustomary, discriminatory and costly to not recognize the wood producer as an organization--just as SFI does for participants. SFI does not require every participant employee to be "trained" or certified (see 'certified program participant'); it's unreasonable to expect wood producers to "train," as you require, the producer's "persons." This individual definition fails to respect different state professional logger programs--such as Oregon's, which defines the certified entity as the professional logger "company." The SFI defines "participants" AND "wood producers" as companies; QLP and CLP should receive equitable recognition, to avoid discrimination expressed in the 2010-14 SFI STD.	an organization, business or person... Item a. Eliminate this "crew" under direction... requirement. Item b. This clause can be eliminated. If this clause were so important, then it should be equally important for the SFI Standard to acknowledge that the QLP should receive a rate premium for their certification qualification!	2	Task Group to study this definition (Qualified Logging Professional) further during the second comment period.	
reforestation: The reestablishment of forest cover either naturally or by seeding or planting of seedlings.					

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It seems like there should be some reference to a timeframe to establish a clear distinction between afforestation and reforestation.			2	This definition has been in the standard for prior versions and has not proved to be an issue.	None
special sites: Sites that include ecologically or geologically unique or culturally important features.					
There should be clear guidance as to what may constitute an			2	This definition has been in the standard for	None
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 such as the conservation of soil, air and water quality, carbon, biological diversity, wildlife and aquatic habitat, recreation, and aesthetics.					
Needs a human component: sustainable forestry connects the forests with the people. It is not just about Products and Services.	The "sustainable" label need to value the cultural, traditional, and historic human connections between communities and the forest. Must meet Montreal Process 6. 6.Maintenance and enhancement of long-term multiple socio-economic benefits to meet the needs of societies.		2	This definition has been in the standard for prior versions and has not proved to be an issue.	None
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 conformance with best management practices, including those sources from certified logging professionals; b. a process to identify and use sources of available data (e.g., state or provincial monitoring programs, certification status of suppliers) in the use of best management practices; and c. a method to assess supplier performance, if needed, to supplement available data.					
This should be moved to the Section dealing with BMP Monitoring and not buried back here in the definitions. In general, SFI should move beyond BMP monitoring, as we are at 90-95% implementation. Lets move on to the next challenge and opportunity for continual improvement.			2	Definitions to remain in one section.	None
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.					
A wood producer is everything that is not Purchased Stumpage. It is Gate wood/Open Market wood, This definition is confusing and not accurate. It is an indirect source of wood in that the PP does not have a timber deed, but rather wood is owned by another entity and then delivered to the mills as their wood, not that of the landowner.			2	This definition has been in the standard for prior versions and has not proved to be an issue. Requirements for SFI "wood producers" are only for those that fall under the SFI definition.	None

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Here a logger is either a person or organization. It should be the same for the CLP and QLP. Why only loggers stated as the only forest professional contractor?	It's obvious; why discriminate against the forest contractor--all should be person or organization. There are many types of forest contractors working on forest participant lands.	Consider being more inclusive, as needed. e.g. forest contractors, loggers, road contractors, slash contractors, forest transportation contractors, forest protection, reforestation, young forest management, and so forth. The SFI STD goes into excruciating detail concerning trivial minutia, yet the logger is the only forest contractor managing the participants forest. A mystery?	2	Comment related to that at line 36 - definition of qualified logging professional subject to further review during he second review period.	

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Language about "fiber sourcing" is highly variable through the Standard and in actual use, with only "fiber sourcing" & "responsible fiber sources" in the Definitions, and with a label called "Certified Fiber Sourcing". If these terms mean different things, they should each be defined; if they mean the same thing, only on such term should be used. All in all, confusing about fiber sourcing creates difficulties for SFI COC certificate holders and even gives the impression that SFI is trying to "pull a fast one" with its fiber sourcing provisions. (It does not help that rules for SFI fiber sourcing are lumped into the section (4) of the Standard dealing with label use.) Note: • "fiber sourcing objectives" is italicized on page 3 of Section 1 of the Standard, but does not appear in the Definitions. • "responsible fiber sourcing" is italicized on page 1 of Sections 3, 4, & 5 of the Standard, but this term does not appear in the Definitions. • Under 1.1 of Section 4 of the Standard, the term "SFI Certified Fiber sourcing on-product label" is used, but the label actually says "SFI Certified Fiber Sourcing" (the "s" is capitalized) and "Fiber sourcing" does not appear in the Definitions. (Similarly, in 3.4 & elsewhere, "Certified Fiber sourcing Label" is used.) On page 3 of Section 1, the Standard says "Fiber sourcing labels do not make claims about certified forest content but they do make claims about certified fiber sourcing practices for procured wood fiber", but many opportunities are lost for SFI COC certificate holders to use unlabeled materials from certified fiber sourcing systems because: 1. there is little appreciation for the fact that a facility might hold a fiber sourcing certificate for their roundwood sourcing system with no guarantee that the certifying body would or should check to ensure that (e.g.) no market pulp of uncertain origin is being added to the process, especially since the definition of "fiber sourcing" does not include pulp. 2. the Standard does not include a provision for certified-fiber-sourcing producers to tell customers about the certified nature of their materials, and 3. some certified producers claim to believe that they may not			3	Repeat of comment above at line 59. Issues with text in italics identified in the comment to be resolved following the next comment period. Items 13 - addressed in Sections 3 - Chain of Custody and Section 4 - SFI On-Product Label Use.	
Use this space to propose any removals or additions:					
forest contractor CLP and QLP rate consideration state with stringent forestry regulatory program State Implementation Committee			3	Do not understand the comment.	None

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Riparian Area Rationale: The standard also does not define what a riparian zone is. “Riparian zone” and “riparian area” are both used however there is no supporting definition to distinguish one from the other. Proposed new language: riparian area - zone of transition of variable width between aquatic and terrestrial ecosystems that may, but does not always, include wetlands. (There are also many other acceptable definitions to choose from). Wetland Rationale: In many performance measures and indicators we suggested wetlands needed to be incorporated thus a definition for this term is also necessary. We propose that carefully defining “wetlands” will assist in meeting the purpose of this objective and others. Wetlands are key landscape features that protect water quality and quantity by capture sediments and pesticides and slowing runoff. Water body is also not defined thus it is not clear that open water wetlands are considered and only a definition for non-forested wetlands is referenced (we provide suggestions in the “Definitions” section). Ideally, all water resources including wetlands should be defined. Proposed new language: wetland- areas which are seasonally or permanently waterlogged and characterized by vegetation adapted for life in saturated/flooded conditions. Wetlands can be treed, shrubby or open and include bogs, fens, swamps, marshes and shallow open water areas less than 2 meters (sometimes called vernal pools). Some wetlands are stagnant systems (e.g. bogs), slow flowing (e.g. fens, swamps) or have fluctuating water levels (e.g. marshes, shallow open water)			2	Comment addressed by new definition for riparian area.	See proposed definition of riparian area.
Socially responsible is not defined: see objective 7. Add socially responsible definition similar to Montreal Standard 6. Maintenance and enhancement of long-term multiple socio-economic benefits to meet the needs of societies.			2	Concept of social responsibility is a key tenant of the definition of sustainable forestry which is a defined term. While the phrase social responsibility is used in Section 1 - Introduction, Section 2 - Objective 7 does not have a reference to social	None

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wildfire: an unplanned, unwanted wildlands fire including unauthorized human-caused fires, escaped fires and all other wild land fires where the objective is to put the fire out.			2	This definition has been in the standard for prior versions and has not proved to be an issue.	None
General Comments					
Sustainable Harvesting: The SFI fails to require one of the most basic tenets of sustainability – that resources not be depleted over time. The SFI Standard fails to clearly require the most important aspect of sustainable harvest for timber and other forest products: that harvest volumes not exceed growth volumes within each planning unit during appropriate time periods. The Standard does include a Performance Measure calling for "forest management plans [that] include long-term harvest levels that are sustainable..." and an indicator calling for use of "a long term resource analysis." However, the Standard does not define the term "sustainable harvest" nor do any indicators specify how sustainable harvest levels are to be calculated with regard to the relationship between harvest and growth rates. Thus any harvest rate can be found in compliance with the Standard, including those that greatly reduce timber stocking levels in the short and/or long term. Relevant SFI provisions: Performance Measure 1.1, Indicator 1.1.1, and SFI Definitions.			2	The Review Committee respectfully disagrees that the concept of sustainable harvest levels are not adequately defined in the standard. Sustainable harvest levels and specific provisions regarding their development, documentation and review are included throughout Objective 1.The two provisions cited in these comments, 1.1.1.g and 1.1.2 do address the commenters' concerns. 1. Removal of areas that reduce potential harvest levels from calculations of sustainable harvest levels. This is covered in 1.1.1.g with the key phrase "for areas available for harvest". 2. Removal of species from growth calculations that are a large component of the forest and do not have commercial value. This is covered in PM 1.1 with the key language "appropriate growth-and-yield models". Use of models that include non commercial species to justify higher harvest levels of commercial species would result in a non conformance for this indicator. 3. It is common practice for determining sustainable harvest levels by management unit and forest types. This is also covered in 1.1.1 with the key language "Forest management planning at a level appropriate to the size and scale of the operation..." 4. Annual evaluations of the harvest trends are required in 1.1.2, periodic updates of inventory and recalculation of planned harvest to account for changes are required in 1.1.1 and actual practices must be	None.

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Certified Forest Content: The SFI "Chain of Custody" labels mislead consumers by treating some types of non-certified forest content the same as certified forest content for the purpose of calculating fiber inputs and label claims/usage. The SFI allows the "Certified Forest Content" percentage claims on its Chain of Custody labels to be disproportionate to the amount of SFI certified fiber actually contained in the labeled product lines. Similarly, the SFI allows its volume-credit based Chain of Custody labels to be used disproportionately to the amount of SFI certified fiber actually contained in the labeled product lines. In particular, wood and fiber from American Tree Farm System (ATFS) "certified" forests is counted the same as wood and fiber from SFI certified forests, for the purpose of calculating "Certified Forest Content" and corresponding label statements, in the case of the percentage labels, or corresponding allowable usage of the label, in the case of the volume credit labels. As much as 100% of the wood in products bearing the SFI percent content and volume credit labels can come from such forests. This is misleading, given that the ATFS system lacks most of the SFI Standard's requirements (weak as those requirements are), and is even less of an independent system than the SFI, given the ATFS Standard's almost complete lack of performance standards whose interpretation and performance outcomes are not largely at the landowner's discretion, given that most ATFS forests appear to be "certified" by consulting foresters rather than third-party accredited verifiers, and given the lack of independence and balance in the ATFS' governance. Relevant SFI provisions: SFI Chain of Custody Standard, section 3.4; SFI Rules for Use of SFI On-Product Labels; SFI Definitions.			2	The comments do not accurately describe the breadth and depth of SFI program requirements on product labeling. The SFI's requirements regarding labeling, and the use of the volume-credit is almost identical to other labeling programs such as the Forest Stewardship Council. The SFI labeling requirements recognize fiber from standards in North America that have been endorsed by PEFC. PEFC has detailed requirements and a very rigorous, transparent process, for endorsement. Questions or comments regarding the requirements of and endorsement of the American Tree Farm System (ATFS) by PEFC should be addressed to ATFS or PEFC.	None.

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The SFI does not meaningfully exclude fiber from illegal logging and other controversial sources from the non-certified component of products bearing the SFI "Chain of Custody" labels. The SFI does not have consistent or sufficient requirements for excluding the most controversial sources of wood and fiber from non-certified and non-recycled inputs to products bearing the SFI "Chain of Custody" labels. For non-certified and non-recycled fiber sourced from within North America, the SFI does not even attempt to exclude wood and fiber from illegal logging, violations of indigenous peoples' rights and other civil rights, forests being converted to plantations or non-forest land uses, or threatened and endangered species' habitats, old growth, or other high conservation value or endangered forests. Meanwhile, for non-certified and non-recycled fiber sourced from outside of North America, the only requirements of any substance are for producer to obtain self-declarations from their suppliers that they are avoiding "Controversial Sources," for producers to conduct a risk analysis and second or third-verification of samples of their suppliers' self-declarations, and for producers to "ensure procurement from areas outside the United States and Canada promote the conservation of biodiversity hotspots and high-biodiversity wilderness areas." However, supplier self-declarations are of little value, and the SFI restricts its definition of "Controversial Sources" to only one type of illegal logging out of many (i.e., timber theft or illegal harvest in parks) and to areas outside of North America "without effective social laws." Likewise, no actual forest protection or other tangible outcomes are required with regard to the priority biodiversity areas. Relevant SFI provisions: SFI Chain of Custody Standard, section 3.6.; SFI Definitions.			2	The comments do not accurately describe the breadth and depth of SFI program requirements to exclude controversial sources including illegal logging. The SFI Standard has numerous provisions to deal with controversial sources including illegal logging. Furthermore, 98% of the fiber supply used by SFI program participants comes from the United States and Canada which have very mature regulatory and legal systems in place and laws and regulations are strictly enforced. This is in addition to a SFI Board approved *Legality Requirements and Policies for Avoidance of Illegal Logging* policy that is applicable to any organization seeking to become SFI certified (Section 7).	See proposed language in draft: Section 2 - SFI 2015-2019 Standard Objectives 8 - Recognize and Respect Indigenous Peoples Rights; Objective 9 - Biodiversity in Fiber Sourcing; Objective 12. Promote Conservation of Biological Diversity, Biodiversity Hotspots and High-Biodiversity Wilderness Areas; Objective 13. Avoidance of Controversial Sources including Illegal Logging; Objective 14. Avoidance of Controversial Sources including Fiber Sourced from Areas without Effective Social Laws; and Objective 15. Legal and Regulatory Compliance; Section 3 - SFI Chain-of-Custody Standard: 3.7 Process to Avoid Controversial Sources; Section 4 - SFI On-Product Label Use Rules for Use, Part 6. Process to Avoid Controversial Sources; and Section 13 - Definitions - expanded definitions for controversial sources and illegal logging.

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