Final Comment Period Comments

Draft SFI 2015-2019 Standard
(January 6, 2014 version)

September 2014

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SECTION 1. INTRODUCTION

(This introduction is informative, and as such, is not an auditable element.)

Sustainably managed forests make a vital contribution to society by providing economic, environmental and social benefits indispensable to the quality of life. A commitment to sustainable forest management means protecting water quality, soil, wildlife and unique resources; promoting human health and safety; providing employee training and education; and communicating the benefits of the practice of sustainable forestry to the general public.

The SFI 2015-2019 Standard reflects this commitment to social responsibility through its principles, objectives, performance measures and indicators. The SFI program is based on the premise that responsible environmental behavior and sound business decisions can co exist to the benefit of communities, landowners, manufacturers, shareholders, customers and the environment, today and for future generations. It was launched in 1994 as one of the forest sector's contributions to the vision of sustainable development established by the 1992 United Nations Conference on Environment and Development (UNCED). The SFI program was developed with multi-stakeholder input, including environmental non-government organizations, industry, scientists, academics, government agencies and professional organizations.

Following UNCED, many nations began to consider how they would measure and track their progress toward the goal of sustainability. In 1993, a United Nations committee convened an international seminar in Montréal, Quebec, on the sustainable development of temperate and boreal forests. This conference led to the formation of the Working Group on Criteria and Indicators for the Conservation and Sustainable Management of Temperate and Boreal Forest, also known as the Montréal Process. The Canadian and U.S. governments are signatories to the Montréal Process, along with Argentina, Australia, Chile, China, Japan, Korea, Mexico, New Zealand, Russia and Uruguay. These 12 countries represent 90 percent of the world's temperate and boreal forests, and 60 percent of the world's total forests.

By endorsing and working with the Montréal Process criteria and indicators, participating countries have made a national commitment to work towards the sustainable management of their forests. Montréal Process criteria and indicators are intended to track progress at a national level and provide an international reference for policy-makers. Many can be reinforced and supported at a local level and are, therefore, reflected in the SFI 2015-2019 Standard's principles, objectives, performance measures, and indicators.

The Montréal Process criteria are:

1. Conservation of biological diversity
2. Maintenance of productive capacity of forest ecosystems.
3. Maintenance of forest ecosystem health and vitality.
4. Conservation and maintenance of soil and water resources.
5. Maintenance of forest contribution to global carbon cycles.
6. Maintenance and enhancement of long-term multiple socio-economic benefits to meet the needs of societies.
7. Legal, institutional and policy framework for forest conservation and sustainable management.

Global Recognition

The SFI program has progressed steadily to become an independent, globally recognized North American (United States and Canada) standard composed of principles, objectives, performance measures and indicators. The SFI Standard is recognized by governments, corporations, and social and environmental groups across North America and globally. The SFI Standard setting process, certification and accreditation of certification bodies requirements are consistent with guidelines published by the International Organization for Standardization (ISO), a worldwide federation of national standards bodies.

In 2005, the international Programme for the Endorsement of Forest Certification schemes (PEFC) first endorsed the SFI 2005-2009 Standard, and appointed the Sustainable Forestry Board to be the PEFC-US governing body.

The SFI 2010-2014 Standard was re-endorsed by PEFC in 2011. Since 2007, SFI Inc. has served as the PEFC US national governing body. PEFC sets minimum benchmarks that national forest certification programs must meet or exceed to be endorsed. PEFC endorsement increases international recognition and enhances marketing opportunities for SFI Certified Program Participants around the world. The SFI Standard is applied to larger forest operations, and SFI Inc. recognizes the American Tree Farm System® (ATFS) as the non-industrial landowner certification program in the U.S., encompassing thousands of family forest owners. ATFS has also been endorsed by the PEFC.

SFI Governance and Stakeholder Involvement

The SFI program is operated by SFI Inc., a fully independent non-profit charitable 501(c) (3) organization. SFI Inc. is governed by an 18-member board of directors made up of three chambers with equal membership: environmental, social and economic. The diversity of the board members reflects the variety of interests in the forestry community. This multi-stakeholder board of directors is the sole governing body over all aspects of the SFI program, including the SFI 2015-2019 Standard, chain-of-custody, labeling and claims, marketing and promotion.

The SFI External Review Panel, comprising environmental, conservation and forestry experts, annually reviews the program's progress, and releases a report publicly. In 1997, the panel adopted an independent charter under which it selects its own members and develops its own agenda to represent the public interest as an outside observer of the SFI program.

Thirty-five SFI Implementation Committees across North America operate at the regional, state and provincial level to help promote the SFI Standard through targeted local actions. They involve public agencies, universities, local forestry associations, landowners, loggers, partnerships with conservation groups, and other community-based organizations. As part of the SFI program, SFI Implementation Committees promote forester and logger training programs to reach the thousands of independent contractors that are the key to the quality of forest management and harvesting operations.

Conservation Support

The SFI program has the support of conservation groups who recognize that SFI certification helps to protect and create wildlife habitat, biological diversity and other important forest values. Many of these conservation groups partner with SFI Inc. and SFI Certified Program Participants on research to advance understanding of forestry-specific issues, achieving mutual conservation goals and providing tangible, on-the-ground benefits for forests in North America.

Public Involvement

Public involvement, communication and public reporting in the SFI program is welcomed and reflected in the SFI 2015-2019 Standard under Objectives 18, 19, and 20. Certified Program Participants are required to support and promote mechanisms for public outreach, education and involvement related to forest management. In addition, on public lands, Certified Program Participants are required to participate in public land planning and management processes with appropriate governments and the public. On these public lands, Program Participants are required to confer with affected indigenous peoples.

The SFI program requires an SFI Certified Program Participant to provide a report prepared by the certification body to SFI Inc. after the successful completion of a certification, recertification or surveillance audit to the SFI Standard. These reports are publicly available on the SFI Inc. website (www.sfiprogram.org).

The public also has avenues to voice concerns related to the SFI program and its participants and have them addressed through an open, transparent complaint process.

Requirements for Certified Program Participants

The SFI 2015-2019 Standard applies to management of forests throughout North America where management intensities range from managed natural forests and plantation forestry, regardless of the forest products derived from management of such forests. Short rotation woody crop operations and other high-intensity forestry operations, are beyond the scope of the SFI 2015-2019 Standard.

SFI Certified Program Participants must comply with all portions of the SFI 2015-2019 Standard relevant to their operations, taking into account their local conditions and circumstances and the scope and scale of their operations. In addition, the SFI 2015-2019 Standard requires Certified Program Participants to take their commitment to responsible stewardship beyond the bounds of their own lands and operations by encouraging others to adopt the principles and objectives of the SFI 2015-2019 Standard. Certified Program Participants are required to work with their suppliers to make sure they are meeting program goals for best management practices. They are also required to invest in research to enhance the practice of sustainable forestry, add to scientific knowledge, improve forestry practices, and increase the overall productivity of forests.

SFI: the North American Standard with a Global Reach

SFI is the only single North American standard and is one of the largest and fastest-growing certification standards in the world. The hundreds of Certified Program Participants across North America include private landowners, public landowners and managers, conservation groups and universities.

There is one SFI Standard that applies to the United States and Canada. Certified Program Participants must comply with federal, provincial, state and local laws that cover a broad range of issues, and protect the environment, workers and people who live in the communities where they operate. They include federal, state, provincial or local forestry-related environmental laws and regulations found in the United States and Canada such as The Clean Water Act, The Endangered Species Act, The Species at Risk Act, The Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), and state or provincial forest practice laws. The social laws of the United States and Canada cover civil rights, equal employment opportunities, anti-discrimination and anti-harassment measures, workers' compensation, measures to protect indigenous peoples' rights, workers' and communities' right to know, wages and working hours, and occupational health and safety. Antitrust, business competition and other laws in the United States and Canada outline business procedures that must be followed.

The SFI program does not try to duplicate the comprehensive sustainable forestry laws and processes already mandatory in the United States and Canada. Both countries have mature legal systems that consistently discourage and punish illegal behavior. Given the wide range of due process and compliance mechanisms that ensure conformance with applicable laws, the SFI Standard purposefully focuses on continual improvement of the practice of sustainable forestry, forest productivity, environmental performance processes and community outreach that complements the existing legal framework.

When an SFI Certified Program Participant procures wood offshore (beyond North America), the SFI 2015-2019 Standard stipulates the need to avoid controversial sources of supply, including illegal logging and fiber sourced from countries without effective social laws.

Responsible Fiber Sourcing

Through its fiber sourcing requirements, the SFI program stands apart from other forest certification programs by supporting and promoting sustainable forest management practices on these lands.

Today, 10 percent of the world's forests are certified. In North America, while large tracts of public and industrial forest lands are certified, the majority of family forest land is not certified. SFI Inc. encourages certification of lands owned by small family forest owners but it is a fact that many family forest owners do not have the resources, nor do they perceive the need to incur the annual cost associated with maintaining a certified forest – especially those who own small acreages.

In the United States, more than 10 million family forest owners account for 60 percent of the forest land and more than 60 percent of the raw material used by SFI Certified Program Participants. In Canada, family forest owners in many regions provide a significant share of the raw materials used by SFI Program Participants.

In North America, SFI Certified Program Participants who source fiber from uncertified lands must engage in private landowner outreach and logger training. They must have a program for the purchase of fiber from certified logging professionals and qualified logging professionals, and programs and provisions for the application of best management practices that protect water quality on those uncertified lands.

In addition, SFI fiber sourcing requirements promote the identification and protection of important habitat elements for wildlife, including critically imperiled and imperiled species and communities, and foster prompt reforestation of harvested sites. For SFI Certified Program Participants, these fiber sourcing requirements are audited by a third-party independent accredited certification body, which samples for evidence of logger training, landowner outreach, reforestation, conformance with applicable laws and adherence to best management practices on uncertified lands, as well as the other requirements set out in the SFI fiber sourcing objectives.

Certified sourcing labels do not make claims about certified forest content but they do make claims about certified sourcing practices for procured wood fiber. SFI fiber sourcing supports family forest owners and their efforts to keep forests as forests, while providing the marketplace with forest products from responsible sources.

From the Forests to the Market

Forest certification is often complemented with a chain-of-custody certification, which is a mechanism used to track wood from a certified forest, providing a link between the certified forest and the certified product.

The SFI program offers a suite of product and promotional labels that allow appropriately certified organizations to make claims about the content in the product they sell that comes from certified forests. So whether it is a paper, packaging or construction materials, a claim can be made regarding the certified forest content, similar to recycled content claims and labels seen on products. This helps customers and consumers of forest products identify and give preference to products from well-managed forests.

In this age of increased corporate social responsibility and consumer awareness, the SFI program provides the market with a valuable tool to buy responsibly – with labels for certified forest content as well as for certified sourcing. See Sections 3 and 4 of the SFI requirements document.

Third-Party Independent Certification

The SFI 2015-2019 Standard requires third-party independent certification audits by competent and accredited certification bodies for all certifications: forest land certification, fiber sourcing certification and chain-of-custody certification. All certification bodies must be accredited by a North American member of the International Accreditation Forum, i.e. ANSI-ASQ National Accreditation Board (ANAB), American National Standards Institute (ANSI) or the Standards Council of Canada (SCC).

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
"Short rotation woody crop operations and other high-intensity forestry operations" should be defined and renamed with a more accurate name.	This term is vague and subject to misinterpretation. A 25-year rotation that involved mechanical site prep and planting in interior Alberta could be considered both "short rotation" and "high-intensity"; while, the same would be considered "normal rotation" and "low-intensity" in the southern US. I believe the intent is to exclude "Bio-energy" rotations where the final product is biomass for energy production and the systems to produce the product are more similar to agriculture than forestry.	Woody crop agriculture operations and similar systems that produce biomass type raw materials for energy consumption as a final product are beyond the scope of the SFI 2015-2019 Standard. These systems are generally distinguished from "Forestry" by very short (< 10 year) rotations, primary crops termed as bio-mass or fuel wood. Forestry, in contrast, results in forests that produce products that include sawlogs, pulpwood, chip-n-saw, poles, utility logs, and similar raw material outputs.	2	Bioenergy Task Group has reviewed the comment. SFI understands that this topic is an evolving issue requiring further review and analysis. However, for the SFI 2015-2019 Standard "short rotation woody crops" are not in scope of the standard.	None
	Inconsistent and unclear who has a higher status: first nations or researchers. In some places it is encouraged others it is required (ex. Research is supported or required)		2	Not clear what part of the standard the comment is attributed to. However, where Indigenous peoples have legal status their legal rights are paramount. However, this legal status should have no negative impact on the conduct of research by Program Participants.	None
Clarify and make consistent throughout the document.	Are people required to invest in research or encouraged to do so. It's not clear in the introduction		2	As per Objective 15 Forestry Research, Science and Technology, Program Participants are required to support research. This can be in the form of direct research and monetary or in-kind support of research in support of furthering sustainable forest management	None

A definition of what "short rotation" means relative to those operations being excluded from the scope of SFI certification in encouraged.	Without a definition it is unclear to participants and auditors what might be considered "short rotation woody crop operations" - e.g. does this include loblolly pine managed on 30 year rotations - or is this aimed at much shorter rotations than that?	Propose adding a definition of "short rotation woody crop" to definitions.	2	The Bioenergy Task Group has reviewed the comment. SFI understands that this topic is an evolving issue requiring further review and analysis. However, for the SFI 2015-2019 Standard “short rotation woody crops” are not in scope of the standard.	None
Certified Sourcing labels may be misleading to customers as they do not guarantee that fiber comes from sustainably managed forests.	The Certified Sourcing label may be misleading and should be strengthened to require that fiber is sustainably sourced, eliminated, or renamed to indicate that it is focused on training and practices and does not guarantee that fiber comes from sustainably managed forest.	Recommend strengthening or renaming Certified Sourcing label and revising language around it to address concerns about potentially misleading customers.	2	Certified Sourcing requirements have been revised to strengthen the requirements for Secondary manufacturers and for use of the Certified Sourcing Label	Refer to revised SFI CoC Standard and new Fiber Sourcing Standard.
Define / clarify what is being referenced by "short rotation woody crop operations and other high-intensity forestry operations..." Either define "short rotation / high-intensity" or use a term commonly defined by others ... such as "agroforestry."	Unclear what is in/out of scope. Local practices vary and what is high-intensity in one place may not be in another. Short rotation may be necessary given certain uses/species.	define or use a previously defined term such as "agroforestry."	2	Bioenergy Task Group has reviewed the comment. SFI understands that this topic is an evolving issue requiring further review and analysis. However, for the SFI 2015-2019 Standard “short rotation woody crops” are not in scope of the standard. The need to define the term high-intensity forestry operations is still under consider.	None
In the Introduction there is no change to the statement “Short rotation woody crop operations and other high intensity forest operations…..” are beyond the scope of SFI. It goes on to say that “The requirements for forest management and fiber sourcing are the same regardless of whether the end-user is a traditional forest or paper product company or emerging bioenergy production company.”		NASF Comment: It would help to more specifically define what is in and out of scope as it pertains to wood used for energy….how short do they mean by short rotation?…..how high of intensity do they mean?….what species are considered allowable?	2	Bioenergy Task Group has reviewed the comment. SFI understands that this topic is an evolving issue requiring further review and analysis. However, for the SFI 2015-2019 Standard “short rotation woody crops” are not in scope of the standard.	None
XX hopes that as the SFI Standard evolves over time, it maintains its results-based approach to helping forest companies and other organizations achieve forest sustainability, as opposed to moving towards a more prescriptive based set of requirements within the standard. Anything that might otherwise cause an increase in program costs are not welcome, including monitoring requirements, landscape assessments and training requirements for loggers.			3	General comment - no specific response required.	None
Move to a 5 year Certificate length.	Many Certificate holders are Dual certified. It makes sense to have the Certificate correspond, while having no degradation to a Standard.		3	SFI Inc. is working to move from a 3 year certification cycle to a 5 year certification cycle. When and if this goal is achieved it will be incorporated into the SFI program requirements.	None

The SFI program needs to focus expansion on noncertified acres and not acres that are currently certified to CSA, FSC, ATFS or other sustainable forestry Standards.	from a practical standpoint there is no significant on the ground difference in any of these standards.		2	SFI Small Lands Task Group is actively reviewing different options for expanding the amount of certified lands that would not already be included within the scope of AFTS.	None
The use of "other high intensity forestry operations" being beyond the scope. Might require a definition. Page 7 includes "required to invest in research" while under the principles of the standard the words used are "support advances"	insertion of this wording doesn't provide much help as many SFI participants rely on their contributions to SFI or SICs to support research collations	The originator needs to define this otherwise drop it. Change the language in the introduction to "they also support research to enhance..."	2	As per Objective 15 Forestry Research, Science and Technology, Program Participants are required to support research. This can be in the form of direct research and monetary or in-kind support of research in support of furthering sustainable forest management.	Refer to revised Objective 15 language in SFI 2015-2019.
There is no reason provided for the deletion of the section titled "Emerging Themes: Bioenergy and Carbon" Also, in the first paragraph under the introduction, biodiversity should be added to the list of resource protected via sustainable forestry	Some indication for the change would be helpful. Definition of wildlife does not include native plants or fungi.		2	The Introduction does address biodiversity in that the SFI Principles, Objectives, Performance Measures and Indicators reflect the Montreal Process Criteria, the first criterion being Biodiversity. Regarding the definition of wildlife not including native plants, etc. this is not thought to be an issue for the purposes of the Introduction – the purpose of which is higher level. Regarding the removal of the BioEnergy and Carbon text from the Introduction. The SFI Standard Revision Steering Committee decided that in view of the ongoing analysis of the issues associated with bioenergy and carbon this text (from 2010) was outdated.	None

We welcome the Sustainable Forestry Initiative (SFI)'s review of its 2010 – 2014 standard, and the opportunity to comment on a revised SFI standard for 2015-2019. While there are many areas of the SFI standard that should be strengthened, we have input on just the major issues that in our opinion are most fundamental to the credibility, transparency and effectiveness of the standard. In this second round of comments we have focused on our top areas of concern. We have chosen not to repeat our previous comments regarding SFI's governance, insufficient safeguards against overharvesting, insufficient restoration requirements, and weak reporting requirements. Our concerns about those elements remain, but because the most recent revision made no substantive changes to address those comments, we assume that submitting them again would have the same result. We appreciate the efforts that SFI has made to reach out for stakeholder input during this process. We also acknowledge the proposed changes that have been made in this version to better align with PEFC. We hope this is an indication that SFI is pursuing endorsement of its CoC standard by PEFC and ensuring alignment with all the requirements of PEFC 2002:2013 CoC standard. We have focused our comments on two categories. The first category includes overarching concerns related to controversial sources, fiber sourcing and associated labeling, and vague language about programs and processes that continues to be used throughout the standard that has drawn concerns from many stakeholder groups over the years. The second category includes comments and recommended edits to specific sections of the standard that we believe are essential for SFI to strengthen given SFI's stated goal of promoting sustainable forest management, biodiversity and other key environmental factors. These include issues around forest conversion, landscape-level biodiversity, and protection of old growth. We and other organizations raised many of these issues in previous SFI standard revision processes, as well as the previous round of comment in this current review. We have also suggested specific language in response to feedback that such language would be more helpful than general commentary. While there are overarching issues that need to be addressed, we recommended specific changes for some of the problematic indicators relating to the above. Thank you again for the opportunity to comment.			2	These comments are addressed elsewhere in this document for comments related to Section 2 Forest Management and SFI Chain of Custody.	None
What exactly is SFI's "social responsibility", which in turn becomes the industry's "social responsibilities"	"Social responsibility" is not a definitive term and as such is subject to a diverse interpretation. Besides if you are a business in the US, there are constant agency and media reminders what responsibilities that we should have.	Consider removing this statement on "social responsibility" or instead use examples that describe what "social responsibilities" that participants must adhere	2	The Steering Committee believes the reference to the social responsibility is still relevant specifically as it relates to communication of the benefits of responsible purchasing practices via the use of SFI labels.	None

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	Threshold Forestland Ownership: The instances of this happening are relatively few and restricted to those whose lands that were in the AFTS program before the company became an SFI program participant. Rather than requiring the company to remove lands from the ATFS program these companies were able to certify their mills to just the SFI fiber procurement requirements. Regarding the interpretation for long-term leases and the ability to certify to the fiber sourcing requirement and not the forest management requirements - this interpretation has been reviewed over the years and has been found to be consistent with the principles of responsible forest management. With the development of a stand-alone Fiber Sourcing Standard these requirements will be enhanced further with increased emphasis on biodiversity within the fiber procurement system.	Refer to new SFI 2015-2019 Objectives 9 and 10.
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	The Task Group has reviewed the comment and believes the comment is addressed by revisions to Section 2 Objectives 12, Section 3 Objective 7 proposed to incorporate features addressing the topic of wildfire. With respect to the comment related to emerging themes in the Section 1 - Introduction - here is no reference to "emerging themes" in this section so unclear of the intent of the comment.	Refer to revised Section 2 Indicators 12.1.1 and Section 3 Indicator 7.1.2
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	Task Group has review the comment and notes that landowner outreach and education are referenced in the Section 1 - Introduction.	None

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**	The respective task groups (Forest Management, Fiber Sourcing and Chain of Custody) have reviewed their respective parts of the SFI 2015-2019 program to ensure clarity in language and consistency in terminology.	None

SECTION 2. SUSTAINABLE FORESTRY INITIATIVE 2015-2019 STANDARD (Draft SFI 2015-2019 Standard language)

PRINCIPLES FOR SUSTAINABLE FORESTRY

SFI Program Participants believe forest landowners have an important stewardship responsibility and a commitment to society, and they recognize the importance of maintaining viable commercial, family forest, and *conservation* forest land bases. They support *sustainable forestry* practices on forestland they manage, and promote it on other lands. They support efforts to protect private property rights, and to help all private landowners manage their forestland sustainably. In keeping with this responsibility, *SFI Program Participants* shall have a written *policy (or policies*) to implement and achieve the following *principles*:

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

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*.

3. *Protection* of Water Resources
To protect water bodies and *riparian* zones, and to conform with *best management practices* to protect water quality.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
You might want to say what capabilities, we, as an industry, have to protect water bodies.	Protection has a wide range of interpretations.	"To protect water bodies by:,,,,"	2	Comment considered and language revised for Objective 3 and PM 3.1 and PM 3.2.	See revised language in SFI 2015-2019 Section 2 - Objective 2.

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.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language

	I like the way SFI seems to be trying to proactively address specific issues that are important & that may become important. Regarding the term biological diversity, such as in the newly proposed objective #9: Biodiversity in Fiber Sourcing, there is need for a critically important clarification.	As you likely know, exotic & invasive-exotic flora & fauna are a huge economic & ecological problem worldwide, destroying biodiversity in a way that, as far as we know now, is completely permanent when it occurs.	Where the term "biological diversity" is used, it is important to clarify that it should pertain to "locally native" or at least "native" biodiversity (wild plants & wild animals). I couldn't find that critically important concept anywhere in text. If it is not present, I recommend those words be included. The term could read "locally native biodiversity" or it could be clarified in the definitions section.	2	Comment reviewed. The existing definition in Section 13 for biodiversity does reflect local presence/abundance of local "life forms, processes, functions, and structures of plants, animals and other living organisms, including the relative complexity of species, communities, gene pools and ecosystems".	None
	Even though there are more indicators in this draft under Objective 4, 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 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 recognized 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. " Finally, SFI standard requirements are generally plan- or program-based, which could be implemented with varying levels of rigor. This is one of the fundamental challenges with the standard, and it has not improved in the draft. It is unclear how the lion's share of performance measures are interpreted or audited, and how SFI can claim consistency in these areas of the program.	Even though there are more indicators in this draft under Objective 4, 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. 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.	4.1.3 Take into account spatial and temporal assessments of forest cover types, age or size classes at the individual ownership level and where credible data are available and relevant to the forest management planning level, at the landscape scale. Retain or restore all of the naturally occurring forest cover types, and age or size classes within those forest cover types at the individual ownership level. 4.1.4 Certified Program Participants can demonstrate how they are incorporating are knowledgeable about credible state, provincial, or regional conservation planning and priority-setting efforts that include Indigenous peoples where possible, to conserve biological diversity and consideration of these efforts in forest management planning. 4.1.7 Certified Program Participants take into account the role of natural disturbances in relation to biological diversity when developing forest management plans. Opening size, harvest layout, and structural retention are designed in proportions and configurations that are consistent with the characteristic natural disturbance regime in each community type. 4.1.8 Certified Program Participants identify and conserve globally, regionally and nationally significant large landscape areas with natural distribution and abundance of naturally occurring species. 4.2.2 Program to locate and protect known sites flora and fauna associated with viable occurrences of critically imperiled and imperiled, and vulnerable species and communities. 4.2.3 In the lower 48, Certified Program Participants conserve conservation of any old-growth forests on their ownerships. in the region of ownership.	2	Task Group has reviewed these comments. • 4.1.3: Indicator 4.1.3 has been revised. Refer to Indicator 4.1.3. Suggested revision to retain/restore all naturally occurring forest cover types was not accepted. • 4.1.4: Task Group did not find that proposed revision enhanced the requirement. • 4.1.7: Indicator has been revised and is now Indicator 4.1.8. Task group • 4.1.8 / 4.2.2: Task group reviewed comments. New Indicator 4.1.5 has been developed to address sites with viable occurrences of significant species of concern. • 4.2.3: Task group has reviewed comment and believes that the revised Performance Measure 4.2 addresses the comment.	See revised Indicators 4.1.3; 4.1.5; 4.1.8 and Performance Measure 4.2
	Define "biological diversity" and indicate to what levels this must managed to.	"Biological diversity" is diversity in action; i.e., it has different meanings across a wide spectrum of public opinoins.	Drop the phrase, or draw us a picture of what we are saying that ww will manage towards.	2	"Biodiversity" is a defined term in Section 13.	None

5. Aesthetics and Recreation

To manage the visual impacts of forest operations, and to provide recreational opportunities for the public.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
include enhanced visual and recreation opportunities	harvests not always negative for aesthetics and recreation (slash removal/treatment, creating vistas and diverse forest and landscape views	"...and to provide and enhance recreational opportunities..."	2	Steering Committee does not believe that comment improves the existing Principle. Definitions of "recreation opportunities" could be different depending on region / stakeholder so enhancement of these could be difficult.	None
Not all non-industrial private landowners have concerns for "public" forms of recreation. Personal recreation, yes, but not public.	As a landowner, I am not interested in allowing any form of public recreation on my land, unless: (1) they are willing to cover the liability insurance and (2) are capable of leaving the place in the condition that they found it -- I doubt either of those is possible.	Drop the "for the public"	3	General Comment.	None

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.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
SFI standard requirements are generally plan- or program-based, which could be implemented with varying levels of rigor. This is one of the fundamental challenges with the standard, and it has not improved in the draft. It is unclear how the lion's share of performance measures are interpreted or audited, and how SFI can claim consistency in these areas of the program.	unauditable indicators, lack of transparency and consistency across the program	Certified Program Participants identify and protect special sites on their properties through all of the following means: 1. Natural Heritage data on G1, G2, and G3 species and communities; 2. Stakeholder consultation, including local communities and indigenous peoples where present; 3. Cultural heritage and historical databases; and, 4. Local experts.	2	Proposed revision is not in keeping with the existing SFI practice for formatting Principles. Also, elements cited in the proposed revision are addressed in other Objectives of the SFI 2015-2019 standard: Objective 4; Objective 8 and Objective 18.	See SFI 2015-2019 Section 2 Objectives 4, 8, and 18.

	Lack of Specific Performance Measures and Indicators The performance measures and indicators attributed to each of the 2015-2019 objectives generally lack specificity and rigor, thereby making it challenging to then have it interpreted as specific guidance of actions to take in the forest, and to result in meaningful sustainable forestry. The indicators tend to provide general, not specific guidance with regards to implementing a performance measure. For example, Performance Measure 4.1 states that "Certified Program Participants shall conserve biological diversity", and the corresponding Indicator 3 "Take into account spatial and temporal assessments of forest cover types, age or size classes at the individual ownership level, and where credible data are available and relevant to the forest management planning level, at the landscape scale." Both the Performance Measure and Indicator lack timelines and targets, and would be challenging to measure their tangible impacts. Without specific performance measures for specific outcomes, requiring how to achieve sustainable forestry, it is challenging to claim one practice is more sustainable than another, or that the entire standard results in sustainable forestry. Further, much of the language is designed to support business-as-usual logging that does not require any specific conservation measures to ensure meaningful sustainable forestry. Given our years of experience in providing input to a range of certification standards and sitting on technical committees for standard creation, we know that the more specific the language, the more rigorous the resulting standard and the more meaningful the results on the ground. Objective 3 "Protection and Maintenance of Water Resources" in the 2015-2019 standard provides an example of stronger language that should be applied throughout the revised standard. The specific language we are referring to is: "exceeding all applicable laws" (Performance Measure 3.1); "conforming to" and "implementing best management practices"; "identifying and protecting" non forest wetlands and water bodies. However all wetlands, not just non-forested wetlands should be protected. Overarching Comment on Programs Programs are stipulated as solutions for endangered species and forests of exceptional conserv ation value; however, these programs do not contain targets, timelines and standards and instead refer to a "process" versus an outcome/end-point. This means that the SFI standard does not verify successful implementation of programs for endangered species and forests of conservation value.			2	These comments are addressed elsewhere in this document for comments related to Section 2 Forest Management, specifically Objectives 3 and 4.	None
	Important to the landowner or stakeholders.	People who don't own property and don't pay taxes, don't get a vote here	"important to the landowner or stakeholders"	3	General comment	None

1 = final decision subject to review of language developed
2 = discussion required, comment may or may not be incorporated
3 = general comments, comments covered in other areas
4 = comments addressed by other SFI review task force

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.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
Can forestry practices be "socially responsible" and if so to whom?	I would suggest that in order for a forestry practice to be "socially responsible" it could not be scientifically credible, economic nor environmentally responsible.	Drop the term "socially responsible"	3	Task Group disagrees with this comment.	None

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*.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
While this is good from an international sourcing point of view it does not address local issues	Sourcing from illegally logged forests should not be occurring regardless of location	"to avoid wood fiber from illegally logged forests when procuring fiber and to avoid sourcing from countries without effective social laws"	2	Task Group to consider comment and revision have been incorporated into SFI Chain of Custody Standard.	See revised *Controversial Sources* definition and revised process to avoid sourcing from Controversial Sources – Part 3.7 of SFI Chain of Custody Standard
SFI standard requirements are generally plan- or program-based, which could be implemented with varying levels of rigor. This is one of the fundamental challenges with the standard, and it has not improved in the draft. It is unclear how the lion's share of performance measures are interpreted or audited, and how SFI can claim consistency in these areas of the program.	"are encouraged to" makes this indicator totally voluntary and, essentially meaningless as a forest management standard.	8.3. Certified Program Participants with forest management responsibilities on private lands communicate with and/or respond to affected Indigenous Peoples with respect to sustainable forest management practices.	3	Comment is confusing Principle 8 with new Objective 8 – Indigenous Peoples.	None
Do any countries other than the US have "effective social laws"	If so how many? Will we eventually need to exclude all of those countries from selling their forest products?	Truncate sentence; stop @ "North America".	3	General comment – many countries outside of US and Canada have effective social laws.	None

9. Legal Compliance

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

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
Yes we should, can anyone recite all of these that pertain (relate) to current forestry practices, even within their own state?	Too all encompassing,	Use "demonstration of intent to comply,..."	2	Steering Committee does not believe that this proposed edit enhances the existing Principle.	None

10. Research

To support advances in sustainable forest management through *forestry* research, science and technology.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language

The word support is used here but the "introduction" section to the standard uses the phrase "required to invest"	Use the "support" wording from here in the introduction as many companies mat rely on their contributions to SFI or the SIC as contributing to research.	usethe phrase "required to invest"in the introductory section	2	The use of "invest" in this context can mean direct research, investments of staff time supporting research or financial contributions in support of other party's research.	None
Good, we should be doing this!			3	General Comment.	

11. Training and Education

To improve the practice of *sustainable forestry* through training and education *programs*.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
universities, community colleges, and other partners have much to offer here	need stronger partnerships to provide logger and landowner education	"...and education programs and partnerships."	2	Steering Committee has review but does not believe this revision enhances the existing Principle. A program under the SFI definition can include "partnerships".	None
universities, community colleges, and other partners have much to offer here	need stronger partnerships to provide logger and landowner education	"...and education programs and partnerships."	2	See above.	None

12. Public Involvement

To broaden the practice of *sustainable forestry* on *public lands* through community involvement.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
need folks to see and learn about sustainable forest practices	opportunity to involve public and create demonstration areas for edcuation/outreach	"...and demonstration projects."	2	Steering Committee reviewed comment could be too specific for use in Principle.	None
Community involvement needs to be defined.	Often community involvement is written off as donations in the community but no public interaction occurs	To broaden the practive of sustainable forestry on public lands through community involvement and participation	2	Steering Community is revised Principle 12.	Refer to revised Principle 12.
Care to be more specific?	Are you suggesting that only through community involvement, we can effect improvements in sustainable forestry on public lands?	I doubt that, but I would applaude you for attempting that!	2	Steering Community is revised Principle 12.	Refer to revised Principle 12.

13. Transparency

To broaden the understanding of forest certification to the *SFI 2015-2019 Standard* by documenting certification audits and making the findings publicly available.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language

	Why must the findings be made publicly available?	A summary that commitment to certification standards was found and exists should be public record enough,	Remove "making findings publically available" replace with a statement that a certificate of standards compliance is available for review"	2	Transparency is a key tenant of a credible certification program. The standard requires that the summary of the audit be made publically available. The Steering Committee does not believe the proposed revision enhances the principle.	None

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*.

Use this space to propose any removals or additions:

	Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
	15. Communication To actively promote through traditional and social media, SFI's progress in forest certification and development of forestry best practices.			2	Steering Committee believes that proposed new Principle is be addressed with existing Principles 13 and revised Principle 12.	None
	using the best available technologies.			3	Not certain what Principle this comment relates to.	None

Additional comment for 4. Protection of Biological Diversity COMMENT SFI should take a leadership role in thoroughly understanding the importance of prescribe fire, especially in the southeast United States, & much more directly promoting prescribe burning. For details about this importance of prescribe fire, please read the 1-page fact sheet "Why Thin & Burn?" at www.georgiawildlife.com/hunting/game-management under the heading "Habitat Management in Georgia". The continued action of reducing & ignoring the issue of prescribe burning is not environmentally sustainable. If it would be helpful for SFI, the Georgia Department of Natural Resources-Wildlife Resources Division could help coordinate & host a meeting with SFI administrators/stakeholders & other professionals who are exceptionally knowledgeable about the role of fire in forests of the southeast U.S. RATIONALE FOR PROPOSED CHANGE In forests throughout Georgia, & most states in the southeastern United States, combining frequent thins & burns is likely the most beneficial action that can be made for integrating & producing financial & environmental benefits. Thinning & prescribe burning safely mimics natural events that historically sustained Georgia's once abundant forest type of savannah habitat, & many other habitats. Most of Georgia's forest biodiversity (e.g., 4000+ native plant species) evolved from annual lightning-derived wildfires that created natural 1-2 year fire rotations southward & 3-25+ northward, & from ice storms, hurricanes, drought, tree diseases, tornadoes, & wind that often maintained 40-60% tree canopy cover. These opened forests burned often & created diverse plant communities known as early successional habitat offering food, water, cover, & space needed for forest regeneration & by many wildlife species that evolved with fire. PROPOSED NEW LANGUAGE Please add statement under "4. Protection of Biological Diversity" &/or another location where SFI believes promotion of burning would be more effective.			3	Comments addressed elsewhere in Section 2.	None
Preface at the beginning of Section 2 is not in the survey. It states Participants "....help all private landowners manage their forestland sustainably." There is no requirement for participants to help ALL, and I believe SFI, Inc. prefers to use the word "responsibly" in statements like this.			2	Steering Committee has reviewed the comment and believes the current wording I the Preface continues to be appropriate.	None
Added to 4.1.7: Opening size, harvest layout, and structural retention are designed in proportions and configurations that are consistent with the characteristic natural disturbance regime in each community type. 4.1.8 Certified Program Participants identify and conserve globally, regionally and nationally significant large landscape areas with natural distribution and abundance of naturally occurring species.			3	Comment addressed elsewhere in Section 2.	None

These *SFI principles* are further refined in *objectives* 1-21.

OBJECTIVES FOR SUSTAINABLE FORESTRY

SUMMARY Some *Certified Program Participants* own forest land, others own forest land and manufacturing facilities, and others own manufacturing facilities only. As such:

· *SFI Standard* land management objectives 1-8 provide measures for evaluating *Program Participants'* conformance with the SFI 2015-2019 Standard on forest lands they own or control through long-term leases. Through these objectives, addressed in forest management plans, Program Participants are implementing *sustainable forestry principles* by employing an array of economically, environmentally and socially sound practices in the *conservation* of forests - including appropriate protection, growth, harvest and use of those forests - using the best scientific information available.

· *SFI Standard fiber sourcing objectives* 9-11 and 15-21 provide measures for evaluating *Program Participants'* conformance with the SFI 2015-2019 Standard through their *fiber sourcing programs* within the United States and Canada.

. *SFI Standard* objectives 11-14 provide measures for evaluating Program Participants' conformance with the *SFI 2015-2019 Standard* through their *fiber sourcing programs* outside the United States and Canada.

· *SFI Standard* land management and *fiber sourcing objectives* 15-21 provide measures for evaluating all Program Participants' conformance with the *SFI 2015-2019 Standard* for research, training, legal compliance, public and landowner involvement, management review, and continual improvement.

A summary of *SFI 2015-2019 Standard* objectives follows:

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.

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.

Objective 3. *Protection* and Maintenance of Water Resources
To protect water quality in streams, lakes and other water bodies.

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 *habitat* diversity and the *conservation* of forest plants and animals, including *aquatic species.*

Objective 5. Management of *Visual Quality* and Recreational Benefits
To manage the visual impact of forest operations and provide recreational opportunities for the public.

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.

Objective 7. Efficient Use of Forest Resources
To promote the efficient use of forest resources.

Objective 8. Recognize and Respect Indigenous Peoples' Rights
To recognize and respect Indigenous Peoples' rights and traditional knowledge.

Objective 9. Biodiversity in Fiber Sourcing
To broaden the practice of sustainable forestry by conserving biological diversity.

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.

Objective 11. 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.

Objective 12. 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*.

Objective 13. Avoidance of *Controversial Sources* including *Illegal Logging*
To broaden the practice of *sustainable forestry* by avoidance of *illegal logging.*

Objective 14. Avoidance of Controversial Sources including Fiber Sourced from Areas without Effective Social Laws
To broaden the practice of *sustainable forestry* by avoidance of *illegal logging*.

Objective 15. Legal and Regulatory Compliance
Compliance with applicable federal, provincial, state and local laws and regulations.

Objective 16. *Forestry* Research, Science, and Technology
To support *forestry* research, science, and technology, upon which sustainable forest management decisions are based.

Objective 17. Training and Education
To improve the implementation of *sustainable forestry* practices through appropriate training and education *programs*.

Objective 18. Community Involvement and Landowner Outreach in the Practice of Sustainable Forestry
To broaden the practice of *sustainable forestry* by encouraging the public and *forestry* community to participate in the commitment to *sustainable forestry*, and publicly report progress.

Objective 19: *Public Land* Management Responsibilities
To support and implement sustainable forest management on *public lands*.

Objective 20. Communications and Public Reporting
To broaden the practice of *sustainable forestry* by documenting progress and opportunities for improvement.

Objective 21. 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.*

Objective 1. Forest Management Planning

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.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
no exporting of raw forest fibre within the company	contrary to creation of manufacturing near forestry communities. exporting raw fibre undermines the domestic manufacturing industry	no exporting of raw forest fibre within the company	3	General Comment. Task Group does not agree with the comment. Opinion based comment – infringes on PP business process.	None
need to insert "consistent with landowner objectives" after productivity.	sustainable forestry can't be quantified in specific numerical criteria. Therefore much of this is subjective based on landowner objectives and societal expectations		3	Task Group believes comment intent is captured in the existing Objective language.	None
There is a new Performance Measure with Indicators that discourages conversion to other forest types unless there has been careful, documented analysis and no threat to rare forest types, species, ecosystems, etc.		This may discourage conversions that, in fact, make good sense from the standpoint of dealing with forest health issues such as Emerald Ash Borer, climate change adaptability, or other highly suitable management objectives. From an ecological standpoint there is no one absolute forest type for a site as many variables are constantly at play that keeps ecosystems in a state of change.	2	Task Group believes PM 1.2 and new guidance for PM 1.2 address the comment. Comment wants clarification that PM 1.2 will not prevent forest type conversion for ecological, forest health or climate adaptation reasons.	Refer to new PM 1.2 and new guidance regarding PM 1.2.

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*.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language

	If a performance measure is how the industry as a whole is evaluated, why not set this as the Objective?		Make Performance objective 1.1 the Objective 1.	3	Task Group does not believe this proposed revision enhances the performance measure as Objective 1 comprises more than just this one PM. However, PM 1.1 has been revised to expand on requirements for biodiversity.	Refer to Performance Measure 1.1.

PM 1.1 Indicators:

	Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
1. Forest management planning at a level appropriate to the size and scale of the operation, including: a. a *long-term* resources analysis; b. a periodic or ongoing *forest inventory*; c. a *land classification* system; d. soils inventory and maps, where available; e. access to *growth-and-yield modeling* capabilities; f. up-to-date maps or a *geographic information system (GIS)*; g. recommended sustainable harvest levels for areas available for harvest; and h. a review of non-timber issues (e.g. recreation, tourism, pilot projects and economic incentive *programs* to promote water *protection*, carbon storage, *bioenergy feedstock* production, or *biological diversity conservation*, or to address climate-induced ecosystem change).						
	need to drop the references to the "flavor of the day" .such as carbon storage, bioenergy and climate induced ecosystem change	focus on the volumes and growth of the tree and keeping the sites forested. You will accomplish the same objective and actually have elements that can be meaningfully audited.		3	Task Group believes comment is opinion based and ignores the role of climate change adaption, carbon and bio-energy.	None
	Understand who is the beneficiary of a forest management plan -- generally a non-industrial forest landowner.	A non-industrial private landowner is relatively unknowledgeable of these educated forestry terms; often they could care less.	Reconsider items that have importance in a management plan for private landowners and non-forest related businesses.	3	Task Group believes the Performance Measure does not prescribe the size of the unit under management and some or all of the requirements could be applicable to industrial or non-industrial ownership.	Refer to Ind. 1.1.1
2. Documented current harvest trends fall within long term sustainable levels identified in the forest management plan.						
	Changing "annual" harvest trends to "current" harvest trends makes this indicator murky and more difficult to define.	Annual harvest levels can be compared with annual growth projections. What is a current harvest trend?	Suggest changing current harvest back to the present annual harvest language.	3	Task Group reviewed the comment but believes the proposed revision does not enhance the Performance Measure. Harvest trends do not always change on an "annual" basis particularly when harvests are separated by several years.	Refer to Ind. 1.1.1
	replace "current" with previous language = "annual." Unclear if this provides the same level of flexibility to exceed "current / annual" harvest levels for pest / disease / windfall issues.	Annual is defined whereas "current" is ambiguous and timeframes could vary.	Replace "current" with "annual."	3	Comment aligns with comment above at Line 49.	None
	This works great for large industrial landowners; doubt the efficacy for others who sell timber possibly once of twic in their lifetimes.		Add who (what groups) this is aimed at!	3	Comment aligns with comment above at Line 49.	None
	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	None provided. No specific change proposed.	None provided. No specific change proposed.	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. The Task Group also made changes to Indicator	Refer to PM 1.1

	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. *Proposed changes to the Standard more clearly require compliance with companies' self-defined sustainable harvest levels, but still provide no objective definitions or outcomes for those levels.* Relevant SFI provisions (2010-2014): Performance Measure 1.1, Indicator 1.1.1, and SFI Definitions. *Proposed new language: Performance Measure 1.1.*				1.1.2 that clearly state harvest levels have to be sustainable and existing Indicator 1.1.4 requires periodic update or forest inventory and recalculation of planned harvests to account for changes in growth (positive or negative) to ensure sustainable harvest.	
3. A *forest inventory* system and a method to calculate growth and yield						
	Same comments as item # 2.		Same comments as item # 2.			
4. Periodic updates of *forest inventory* and recalculation of planned harvests to account for changes in growth due to *productivity* increases or decreases (e.g. improved data, *long-term* drought, fertilization, climate change, forest land ownership changes, etc.).						
	There is absolutely nothing credible that an operational forest operation can do to tract perceived impacts of climate change.			3	Task Group disagrees with comment regarding climate change but has revised the Indicator 1.1.4.	Refer to revised Indicator 1.1.4.
	Same comments as item # 2.		Same comments as item # 2.	3	Unable to determine what the comment refers to.	None
5. Documentation of forest practices (e.g., *planting*, fertilization, and thinning) consistent with assumptions in harvest plans.						
	Same comments as item # 2.		Same comments as item # 2.	3	Unable to determine what the comment refers to.	None

Performance Measure 1.2. *Certified Program Participants* shall not convert one *forest type* to another *forest type,* unless in justified circumstances where the conversion:

	Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language

This PM is not scientific and at odds with sustainable forestry, the science of Silviculture, and natural succession of species. This PM is unnecessary and should be dropped entirely.	Silviculture, in essence, manages disturbance or the natural succession of species on a site. For instance, following a fire or other disturbance pioneer forest types are created which will trend towards other forest types over time without introducing another large disturbance or silviculture practice. It is not practial or scientific to maintain a forest type on a site simply because it is present at the time a plan is generated. In addition, some stands are in a degraded condition due to past activity or natural conditions such as insect or disease, fire exclusion, high-grading. Maintaining such a forest type would be at odds with sustainable forestry and scientific Silviculture.	Drop the PM. A new PM could state "Sound Silviculture will guide management plans ..." - but, is unnecessary.	2	Comment proposes removing this PM as worded - proposing a new PM where "sound silviculture will guide management plans". Task Group does not agree with the proposed removal of current PM 1.2 and adoption of a new Performance Measure 1.2. However, the task group has revised PM 1.2.	Refer to revised P.M. 1.2.
Conversion maybe too limiting and preclude changing one forest type for a more ecologically suitable forest type. Also in some circumstances there are efforts to planting alternate species to allow for climate change adaptation.	Revise language to allow for species suitable to the site not just address the forest type. Also allow for species plantings that may allow for climate change adaptation.		2	Task Group has reviewed comment and has made revisions to P.M. 1.2 and Indicator 1.2.1 and 1.2.2. Additionally there will be new guidance related to the implementation of PM 1.2.	Refer to revised PM 1.2 and guidance for PM 1.2.
Conversion doesn't take into account the age of the stand.	Add language to allow flexibility based on the age of the stand.		2	Task group believes that P.M. 1.2 when supported by the corresponding guidance is an effective requirement and can be implemented from the perspective of stand age.	Refer to revised PM 1.2 and SFI Section 6 guidance for PM 1.2.
If trees are harvested by a 3rd party (e.g., oil and gas) and provided to the company under the terms of their license can these trees be considered certified and enter the CoC?			3	General comment – as per existing requirements fiber from conversion can enter the SFI supply chain but cannot be counted in the calculation of SFI certified content for SFI CoC.	None
This doesn't allow for conversion which takes place in the natural succession of species (e.g. pine to oak to hickory); this should be acceptable			3	If understood correctly this Comment describes a natural process and not a management action.	None
Is the final harvest from SFI certified lands that were sold and to be converted be considered certified? It should be considered certified.			3	General Comment – in the scenario cited the fiber would not be certified if the Program Participant knows that the land is to be converted upon its sale. See the note in the definition of controversial sources, also Chain of Custody part 3.7.1 and part 6.1.	None

What does is mean; what is considered justified? How does one comply? Clarify			2	Task Group has reviewed comment and has made revisions to P.M. 1.2 and Indicator 1.2.1 and 1.2.2. Additionally there is guidance related to the implementation of PM 1.2.	Refer to revised PM 1.2 and guidance for PM 1.2.
Would this allow any clear cut? Or restrict any clear cut?	Define "conversion"		3	General Comment - SFI has an existing definition of *conversion sources*.	None
What about lands where you are adding roads, power lines, etc.			2	PM 1.3 addresses this comment – legal conversion for utility rights of way is allowed.	Refer to PM 1.3.
What if trees are cut in preparation for, but not yet an approved permit for use change? Would those trees be considered certified?			3	General Comment	None
Does not make reference to research initiatives undertaken by government and industry.	Take into consideration that formal requirements of research and governments – indicator may include government and or industry research.		2	Task Group believes that PM 1.2 addresses the comment.	Refer to PM 1.2.
This represents a big change where you are going to have significant problems. Need to quit trying to out-FSC FSC and focus on responsible management of the land and ownerships in your program			3	Opinion based comment.	None
This seems too broad a statement.	This Performance Measure was likely added to ensure that type conversions which run counter to natural ecological processes would be done only after proper consideration. However, there are many instances where management will convert one type to another in such a way as to parallel natural succession, or to restore a more natural forest where past management or insect/disease has altered it.	Perhaps revise or add an indicator to address/exempt forest type conversions which mimic natural succession, or which restore the forest to types more consistent with site and other environmental conditions.	2	Task Group reviewed comment and has revised PM 1.2 and developed guidance for PM 1.2.	Refer to PM 1.2 and corresponding guidance.
What are the justified circumstances and who will be the "gatekeeper" on this? Forest types are not standard regionally or internationally	in many areas there are undesireable species that occur and sites may be converted through harvesting or planting. (e.g., beech stands in the north eastern U.S. and Maritimes, intolerant hardwoods to tolerant hardwoods through thinnings)	"shall not convert a forest type to one that does not occur in the region" unless...	2	Task Group has developed a new definition for *forest cover type*.	Refer to definition in Section 13 – Definitions.

	Delete this new PM	Too prescriptive. Type conversions may be justified in a number of instances. Many are listed in the standard however this PM may lead to an administrative workload tracking converted stands and preparing assessments. We would argue that so long as planning accounts for long-term growth / yield, maintenance of or increased quality, sensitive sites are protected, FECV's are protected, T & E species are considered, and landscape level impacts are considered - then a stand level PM such as this is not needed.	Delete PM If PM is to be retained, perhaps focus on minimizing the conversions to non-native species?	2	Task Group disagrees with comment proposing removal of this PM.	None
	PM 1.2 and its associated indicators are not accounting for current and future independent forest-adaptation trials and research designed to find ways to lessen the impacts of climate change.	The industry needs to be allowed to conduct research that might otherwise include small scale forest conversion, and to implement those findings, for the purposes of mitigating the potential effects of climate change.	This P.M. needs to be written in a way to account for special research and trials looking into climate change adaptation strategies, and the indicators need to account for planned Government and industry supported research initiatives, for example tests conducted on tenure areas that may include climate change adaptation trials, hybrid poplar plantation trials, and other future research and trials.	2	Comment aligns with comment above at Line 67 related to allowance for research trials, etc.	None
	As currently written (in combination with the definition), this PM is difficult to assess from two perspectives: 1) The definition of conversion is very broad; therefore, includes all treated area, 2) What is the time period in which conversion is evaluated. 1) For example, a conversion could include the treatment of a stand which has an established layer of regen under a different overstory species layer of mature tree. The removal of the overstory while protecting the understory would be considered a conversion. 2) My other comment is that conversion is hard to measure from a time perspective. When would we be obligated to compare the pre and post conditions; 1 year, 2 years, 5 years, 50 years. The combination of these items suggest we need to keep track of all areas treated over time to prove that they were not "converted", instead of having to only justify when we "converted".	1) In the province of NB, we have over 30 forest type characterizations in our growth and yield system, and stand switch from one to the other very frequently. This change in forest type can happen either through harvest or natural succession. This change can also occur in a combination of both processes like in the case of using partial treatments as a silviculture method to mimic successional development. I believe that in these situations we should not have to spend much effort on proving that we did not "convert" 2) Auditors could go to town on this one and create an unrealistic expectation for us to produce a system solely to keep track to prove we did not convert.	Certified Program Participants shall not convert one forest type to another forest type, unless in justified circumstances where the conversion or when using harvest systems to mimic natural disturbances to establish native regeneration. Essentially what I am getting at is make this PM about avoiding "conversion" in more extreme cases. This is especially the case in artificial regeneration where big changes can occur pre to post forest. This PM should not apply providing that we are using regionally accepted methods treating stands with harder to regenerate species (i.e. tolorant species).	2	Task Group has reviewed the comment and believes that PM 1.2 addresses the intent of the comment.	Refer to PM 1.2.

	Delete this new PM	Too prescriptive. Type conversions may be justified in many cases as suggested by some of the indicators. This PM may lead to an administrative workload tracking conversions and preparing "assessments". As long as planning and implementation of management practices provide for maintenance of or increases in quality, sensitive site and FECV's protection, T & E species are considered, and landscape level impacts are considered - then a stand level PM should not be included as it is overly prescriptive.	Delete PM If PM is kept, perhaps the focus should be limited only to minimizing the conversions to non-native species - not all other forest types.	2	Aligns with comment above at Line 71 - wants this PM deleted.	None
	The notion that type conversions are justified only under limited circumstances fails to recognize the forest history of the Eastern US. Past practices have dramatically changed the composition of forest types.	It is very common to have a management goal of natural or forced type conversion to meet a variety of stand and landscape level objectives. as long as planning accounts for long-term growth and yield, maintenance of or increased quality, protection of sensitive sites, conservation of FECV, T&E species considerations, exotic species and landscape level impacts consistent with scale, intensity and risk, etc. then a stand level performance measure that limits or speaks to conversion of one forest type to another forest type is not needed.	Delete PM 1.2 and the associated indicators	2	Aligns with comment above at Line 71 - wants this PM deleted.	None
	This performance measure should be moved to Objective 2	The interpretation that this new PM is constructed from was developed to support 2.1.6. This is a reforestation issue and is a more logical fit in Objective 2	Delete 2.1.6 and add this new PM and indicators as PM 2.2.	2	Task Group reviewed comment but believes the proposed revision does not add clarity related to *conversion of forest cover types.*	None
	The new indicators on conversion do not safeguard against loopholes and do not adequately protect native forests.	While the added language in performance measure 1.2 is noted, these changes do not sufficiently safeguard against unnecessary and ecologically unsound conversion. In particular they seem to allow conversion solely for economic reasons.	SFI should meet the PEFC interpretations of 5.1.1 and add clear, auditable language that prohibits further conversion within certified operations.	2	SFI position regarding prohibition of conversion of forest types does align with allowed conversion under PEFC ST 1003-2010, Clause 5.1.1.	None

	Delete the entire PM. It is inappropriate for SFI to assume that conversion of one forest type to another forest type is contrary to sustainable forestry. This is way too prescriptive and will add significant costs and paperwork to audits, unnecessarily. There are many valid, justified cases for forest type conversion. This should be documented in forest management and regeneration plans and it is up to the auditor to determine if there is valid justification. This fails to recognize the forest history in many parts of the U.S. Past management activities have resulted in "forest types" that are poorly suited to the site and/or that have replaced the previously dominant species. It is very common to convert stands from one native type to another. As long as the conversion is consistent with the rest of the SFI standard and the long-term forest management plan, it is not SFI's place to limit or prescribe how much conversion should occur. Why should a forest manager need to conduct an additional assessment to justify what is a common practice and common sense in many cases?	This will result in unnecessary paperwork (documentation) and audit costs. It also assumes / prescribes very limited amounts of conversion ... which is subjective and up for interpretation by auditors or stakeholders. This is not needed. The SFI standard, when taken in its entirety, addresses the issue of unjustified conversion. Conversion and succession are constantly occurring in forests through management or natural circumstances. Examples of situations which could be limited / encouraged against by this PM: - Off-site, poor quality white spruce stands in the Midwest which were planted in the 1930-1940s by CCC crews. There is very little ecological, wildlife, economic, or social value to maintaining these stands as a white spruce forest type. Naturally they are more suited to other species, even though white spruce is a native species. - Converting ash stands in advance of the presence of Emerald Ash Borer. In some cases, if species besides ash are not encouraged and established prior to EAB infestation, water table levels will rise, thus converting the stand from a forest type to an open wetland type that is not as beneficial for many reasons. - There are many established partnerships and efforts to convert current loblolly pine stands in the SE (which were planted by Industry in the mid 1900s) to more naturally occurring longleaf or shortleaf pine stands. These efforts could be hampered by this PM and the related indicators.	Delete the entire PM and related indicators. At an absolute minimum, change the definition and language to limit conversion from a native forest type to a non-native forest type. Adjust definition and language as needed.	2	Aligns with comment above at Line 71 - wants this PM deleted.	None
	The new indicators on conversion do not safeguard against loopholes and do not ensure adequate protection of valuable forests.		See below.	3	No proposed revision / solution included in content.	None

	Several forest activities are utilized to convert a forest's species composition. These activities promote long living and/or more valuable species. It is taxing to have to justify the circumstances of their use, because these activities are used frequently, to promote forest health, productivity and profitability. The clearcut harvest size requirement is the only other example of this type (shall not do this, unless.... this). It works for the clearcut size requirement because it is not common (to exceed 50 hectares). Conversion of many forest types however is used frequently common and desired. The language should be written for the maintenance of forest types that are of concern.	We regularly use forest activities (harvest, thin, plant etc.) to convert forests comprised of predominantly pioneer species into forests comprised of species that do not establish themselves as efficiently as these pioneer species. Our management plans include objectives to increase our forests composition of certain higher value tree species. This drives re-investment into our land and results in more growth of these valuable native tree species. Forest conversion is a natural process. An area left undisturbed will convert its forest type several times. Some of our forest area is not growing at full potential. This may be the result of past practice or natural disturbance. Forest type conversion is desired for these areas to improve their value, including their ecological contribution. What's important is while working forest types that are of concern, activities are implemented to regenerate that forest type.	Program Participants shall implement forest management practices that promote native forest types. PM Indicators: 1. Practices are in compliance with relevant regional policy and legislation related to forest management. 2. Practices used in native forest types that are rare and ecologically at the landscape level (4.3) are planned and implemented to utilize natural regeneration to maintain these forest types.	2	Task Group reviewed comment and believe the proposed language for PM 1.2 addresses the comment.	Refer to PM 1.2.

	This PM and associated indicators should be removed or substantially reworded to limit the focus of concern to conversions to non-native forest types.	As worded, this new performance measure would be of significant concern. The new performance measure and associated indicators makes it much more onerous to undertake forest type conversions (lots of analysis and justification required) and suggests that such conversions will be a limited occurrence. This runs counter to goals we have (and will continue to have) in our forest management plans to pursue cover type changes for reasons such as forest health, forest diversity, and responding to a warming climate. The standard should not make it difficult to pursue these "conversions" from one native forest type to another. Also, forest types change on their own accord even if not manipulated (e.g., succession to older growth stages, which show up in inventory as a forest type change; or through natural disturbances like wildfire). One suggestion would be to make this performance measure focused on conversions from native forest or plant community types to Non-Native types (but this may also be problematic as landowners are grappling with responses to climate change).		2	Task Group reviewed comment and believe the proposed language for PM 1.2 addresses the comment.	Refer to PM 1.2.
	Throughout this Measure it is not clear if forest type is exclusive to species composition or includes age class.		Certified Program Participants shall not convert one forest types (i.e. species mix) to another forest type, unless in justified circumstances where the conversion:	2	Task Group reviewed comment and believe the proposed language for PM 1.2 addresses the comment.	Refer to PM 1.2.
	This is regulation, not a standard!		If you are going to use this statement, then developers and homeowners must adhere to these same restrictions -- remove statement.	3	Aligns with comment above at Line 71 - wants this PM deleted.	None

	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. *Proposed changes to the SFI Standard required by the PEFC would only partially correct this situation. This language would prohibit "forest type" conversion where it: is illegal, would convert rare native forest types or make native forest types rare at the landscape level, or would create long-term impacts to "forests of exceptional conservation value," old growth, or threatened or endangered species' habitats. However, this likely represents a very limited change from the status quo, and is unlikely to restrict most actual cases of conversion, given that conversion is rarely legally prohibited, occurrences of threatened and endangered species' habitats are poorly documented and now limited in scope (and already protected under law), old growth forests and the SFI "forests of exceptional conservation value" (i.e. certain rare species' habitats) are now also very limited in occurrence, and any given conversion is by itself unlikely to make natural forests rare (as compared with the cumulative impact of multiple conversions by multiple companies). Moreover, as noted below, other proposed changes to the Standard would remove a provision that calls for plantings of exotic species to be "minimized;" this change would potentially enable further conversion.* Relevant SFI provisions (2010-2014): Indicators 4.1.1, 4.1.4, and 4.1.5. *Proposed new language: Performance Measure 1.2.*	None provided. No specific change proposed.	None provided. No specific change proposed.	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. The Task Group disagrees with the commenter regarding the impacts of these new requirements. The new requirements clearly specify (in addition to the restrictions noted by the commenter) that any conversions would be limited in scope and must be justified by a number of factors including the ecological impacts of the conversion which includes a review at the site and landscape scale as well as consideration for any appropriate mitigation measures.	See proposed language at Performance Measure 1.2 and 1.3.

	Conversion of Natural Forest to Plantation. No specific objective or performance measure is required in the SFI 2015-2019 standard. Do not allow for conversion of intact or natural forest ecosystems identified in the Wye River document to be converted to plantation. This is particularly relevant in the US South East as well as tropical forest ecosystems. Prohibit the conversion of natural forest ecosystems and new plantations, by not certifying plantations that were created since 1994 at a minimum or perhaps prior.	None provided. No specific change proposed.	None provided. No specific change proposed.	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. The Task Group disagrees with the commenter regarding the impacts of these new requirements. The new requirements clearly specify (in addition to the restrictions noted by the commenter) that any conversions would be limited in scope and must be justified by a number of factors including the ecological impacts of the conversion which includes a review at the site and landscape scale as well as consideration for any appropriate mitigation measures.	See proposed language at Performance Measure 1.2 and 1.3.
	This PM is not scientific and at odds with sustainable forestry, the science of Silviculture, and natural succession of species. This PM is unnecessary and should be dropped entirely.	Silviculture, in essence, manages disturbance or the natural succession of species on a site. For instance, following a fire or other disturbance pioneer forest types are created which will trend towards other forest types over time without introducing another large disturbance or silviculture practice. It is not practial or scientific to maintain a forest type on a site simply because it is present at the time a plan is generated. In addition, some stands are in a degraded condition due to past activity or natural conditions such as insect or disease, fire exclusion, high-grading. Maintaining such a forest type would be at odds with sustainable forestry and scientific Silviculture.	Drop the PM. A new PM could state "Sound Silviculture will guide management plans ..." - but, is unnecessary.	3	Aligns with comment above at Line 71 - wants this PM deleted.	None

PM 1.2 Indicators:

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
a. Is in compliance with relevant national and regional policy and legislation related to land use and forest management; and					
1.2.1 Include consideration for ecologically suitable species.	Would allow for species selection based on successional changes.		2	Task Group reviewed comment and believe the proposed language for Ind. 1.2.1 addresses the comment.	Refer to Ind. 1.2.1.
Drop	Covered in other PM's	Drop	3	Comment proposes removing Indicator. Task Group disagrees with this comment.	None
These two indicators are inconsistent.		Revise language to use “ecologically suitable” and not just “forest type”.	2	PM 1.2 is not intended to preclude ecologically suited species. Task Group believes the proposed language for Ind. 1.2.1 addresses the comment.	Refer to Ind. 1.2.1.
1.2.2 - “rare and ecologically significant”. Terms are not clear; who decides what is and isn’t; is this different from “threatened and endangered”?		Use the same terms as in Objective 4 AND/OR define the baseline. If we are referencing state/provincial or federal legislation we should state that. Define beyond G1/G2. Consider the role of seral stage or stand age.	2	Task Group believes the proposed language for Ind. 1.2.1 addresses the comment. Regarding the specific reference to defining beyond G1/G2 the Task Group believes that the new Indicator 4.1.5 addresses this comment.	Refer to Ind. 1.2.1 & Ind. 4.1.5.
What if there is an “eco-zone” with multiple species and you need to convert forest types because of management due to climate change?	Need to allow flexibility to go from species types due to climate change.		2	Task Group believes the proposed language for Ind. 1.2.1 addresses the comment.	Refer to Ind. 1.2.1
Is a clear cut a forest type? Converting old growth and planting new forests?	Clarify due to example in Indicator 1.2.3		3	Clearcut is a silviculture method not a conversion.	None
What is the applicable scale? What about slivers of conversion?	In Guidance, explain how small portions would be addressed. Needs to be in context or scale so that slivers could be acceptable.		2	Comment addressed in corresponding guidance for Performance Measure 1.2	Refer to PM 1.2 Guidance - SFI Section 6 Guidance.
This limits appropriate conversions (example: in Minnesota converting to white pine)	State this in the positive “May convert” instead of “Shall not convert”		2	Task Group believes the proposed language for Ind. 1.2.1 addresses the comment.	Refer to Ind. 1.2.1
This makes the performance measure meaningless – if no laws were violated then in compliance - too vague			2	Task Group believes the proposed language for Ind. 1.2.1 addresses the comment.	Refer to Ind. 1.2.1
What is the definition or “regional” – is it town, county, area, state, etc?			2	Task Group believes comment is addressed by Indicator 1.2.1 and in corresponding guidance for Performance Measure 1.2	Refer to Ind. 1.2.1 & PM 1.2 Guidance - SFI Section 6 Guidance.
“regional policy” - Too vague; do they exist?			2	Aligns with comment above at Line 95.	None
Does this relate to age class distribution and early/mid/late successional conversion too? It would be cumbersome to demonstrate to auditors			2	Comment relates to other above re. successional stages, age classes at Line 82	None
Forest management plans may have naturally occurring conversion goals. Auditors, under strict assessment, may characterize them as conversion, creating extra analysis and paperwork. Is it necessary to add more burdens for naturally occurring conversion?			2	Task Group believes the proposed language for Performance Measure 1.2 addresses the comment.	Refer to PM 1.2.
Does this relate to age class distribution and early/mid/late			2	Comment relates to other above re.	None

successional conversion too? It would be cumbersome to demonstrate to auditors				successional stages, age classes at Line 82	
What about mining companies that own property and manage forest for a long time before conducting planned development? This would restrict development.	Clarify intent AND clarify timing and scope of conversion		3	This comment addressed elsewhere at Performance Measure 1.3.	None
This should be restricted to compliance with federal, state, provincial, or local laws or regulations affecting conversion	Compliance with national and regional policy is too broad and moves beyond prior interpretations for this indicator	Is in compliance with relevant federal, state, provincial, or local laws or regulations that restrict conversion	2	Task Group believes the proposed language for Performance Measure 1.2 addresses the comment.	Refer to PM. 1.2
Delete - redundant with other elements in the SFI standard.	Delete - redundant with other elements in the SFI standard. Doesn't add anything.	Delete - redundant with other elements in the SFI standard.	3	Aligns with comment above at Line 71 - wants this PM deleted.	None
We appreciate the clarity on forest type to be focused on species mix and not confused with age classes.	We request that consideration be made to make this Indicator more flexible to include forward thinking approaches to future product markets and future climate conditions, among other uncertainties which may not be adequately addressed through policy and/or legislation.	Is in compliance with applicable legislation and policy objectives related to land use and forest management with consideration paid to the uncertainty of managing ecosystems;	2	Task Group believes the proposed language for Performance Measure 1.2 addresses the comment.	Refer to PM. 1.2
No way!	National and regional policies have been and are morphing into regulations that must be followed and are being written by those who write platitudes not good policy.	Remove statement.	3	Aligns with comment above at Line 71 - wants this PM deleted.	None
b. Would not convert native forest types that are rare and ecologically significant at the landscape level or put any native forest types at risk of becoming rare; and					
1.2.2 What is the baseline for determining what is rare or ecologically significant?			2	Task group has reviewed the comment but believes that the Indicator 1.2.1 and the corresponding guidance for PM 1.2 address the comment.	Refer to Ind. 1.2.1 & PM 1.2 Guidance - SFI Section 6 Guidance
Drop	Covered in 4.3	Drop	2	Task group disagrees with the comment and believes that Performance Measure 4.2 and Indicator 1.2.1 are different in their focus and that Indicator 1.2.1 should be retained.	Refer to Indicator 1.2.1 and PM 4.3
Within what parameters; who's definition of "landscape"	Define without being too prescriptive		2	Task group has reviewed the comment and believes that the Indicator 1.2.1 and the corresponding guidance for PM 1.2 address the comment.	Refer to Ind. 1.2.1 & PM 1.2 Guidance - SFI Section 6 Guidance
Too many possible definitions for these terms; who decides?	Could use definitions of rare or ecosystem from Conservation Data Center/Nature Source		2	Task group has reviewed the comment and believes that the Indicator 1.2.1 and the corresponding guidance for PM 1.2 address the comment.	Refer to Ind. 1.2.1 & PM 1.2 Guidance - SFI Section 6 Guidance
Some types are at risk of becoming "rare" or deemed "ecologically significant" (examples: Long-Leaf Pine and White Pine)	Expand 1.2.4 to allow conversion from Long Leaf and White Pine type …OR change "native" to non-native …OR delete 1.2 and indicators …OR change 1.2 to "may convert in justified circumstances" and remove "limited" from 1.2.4		2	Task group has reviewed the comment and believes that the Indicator 1.2.1 and the corresponding guidance for PM 1.2 address the comment.	Refer to Ind. 1.2.1 & PM 1.2 Guidance - SFI Section 6 Guidance
who determines if converting a natural or native forest to			2	Task group has reviewed the comment and	Refer to Ind. 1.2.1 & PM 1.2 Guidance -

	another forest type actually puts a native forest type at risk? Most in the FSC crowd would say any conversion to nonnative species is bad, and many would claim conversion of natural stands to plantations puts "forests" at risks.				believes that the Indicator 1.2.1 and the corresponding guidance for PM 1.2 address the comment.	SFI Section 6 Guidance
	Remove indicator	Indicator 2 could be in conflict with PM 1.2 Indicator 1. It also significantly goes beyond the requirements of PM 4.3.	None - remove indicator	2	Task group disagrees with the comment and believes that Performance Measure 4.2 and Indicator 1.2.1 are different in their focus and that Indicator 1.2.1 should be retained.	Refer to Indicator 1.2.1 and PM 4.2
	who will define rare and how will it be quanitified?			2	Task group has reviewed the comment and believes that the Indicator 1.2.1 and the corresponding guidance for PM 1.2 address the comment.	Refer to Ind. 1.2.1 & PM 1.2 Guidance - SFI Section 6 Guidance
	What native forest types are considered “at risk” of becoming rare. Delete this phrasology unless you can better define it.	Who defines "at risk". Is there a list somewhere? At risk locally, in the State, in the U.S.?	Remove the reference to "at risk".	2	Task group has reviewed the comment and believes that the Indicator 1.2.1 and the corresponding guidance for PM 1.2 address the comment.	Refer to Ind. 1.2.1 & PM 1.2 Guidance - SFI Section 6 Guidance
	Delete "or put any native forest types at risk of becoming rare" How would this be determined/defined - and at what scale?	How would this be determined/defined - and at what scale.	Delete "or put any native forest types at risk of becoming rare"	2	Task group has reviewed the comment and believes that the Indicator 1.2.1 and the corresponding guidance for PM 1.2 address the comment.	Refer to Ind. 1.2.1 & PM 1.2 Guidance - SFI Section 6 Guidance
	Eliminate "that are rare and ecologically significant..."	While the overall rate of conversion has slowed, this remains conversion of native forests remains an issue in some parts of North America.	Would not convert native forest types.	2	Task group has reviewed the comment and believes that the Indicator 1.2.1 and the corresponding guidance for PM 1.2 address the comment.	Refer to Ind. 1.2.1 & PM 1.2 Guidance - SFI Section 6 Guidance
	Delete - redundant with other elements in the SFI standard. Difficult to determine what native forest types are "at risk of becoming rare" and for what combination of reasons. This may not be the fault of the land manager, and conversion may be the only real feasible option which would maintain the site in a forested condition ... especially when dealing with forest health (pest/disease) issues. Difficult to audit. Narrow to forest types that are already rare, if this is not otherwise deleted.	Delete. Redundant. Difficult to determine what native forest types are "at risk of becoming rare" and for what combination of reasons. This may not be the fault of the land manager, and conversion may be the only real feasible option which would maintain the site in a forested condition ... especially when dealing with forest health (pest/disease) issues.	Delete - redundant with other elements in the SFI standard. If it is kept, need to clarify how the land manager is to determine which native forest types are "at risk of becoming rare" and under what set of circumstances conversion is still justified if the reason the forest type is "at risk of becoming rare" is outside the control of the forest manager.	2	Task group disagrees with the comment and believes Indicator 1.2.1 should be retained.	Refer to Indicator 1.2.1.
	The new indicators on conversion do not safeguard against loopholes and do not ensure adequate protection of valuable forests.		1.2.2 Would not convert native forest types; and	2	Task group has reviewed the comment and believes that the Indicator 1.2.1 and the corresponding guidance for PM 1.2 address the comment.	Refer to Ind. 1.2.1 & PM 1.2 Guidance - SFI Section 6 Guidance
	We strongly request that a definition of ecologically significant be introduced as part of the 2015-2019 Standard. There should be some consideration given to management of public lands being different to management of private lands. Furthermore consider aligning language with Objective 4 such as use of critically imperiled** and imperiled*** instead of ‘rare and ecologically significant.’	This requirement severely infringes on our company’s option to harvest old growth timber based on subjective definitions of what may be considered rare and/or ecologically significant.	Would not convert native forest types that are considered FECVs or put any native forest ecosystem (regardless of age class) at risk of becoming rare;	2	Task group disagrees with the comment and believes that Performance Measure 4.2 and Indicator 1.2.1 addresses the issue described	Refer to Indicator 1.2.1 and PM 4.2
	Who determines what is "ecologically significant" and where is the "landscape level"?	Those that are in the position to determine these matters lack the scientific where with all to correctly understand what they do.	Remove statement.	2	Task group disagrees with the comment and believes Indicator 1.2.1 should be retained.	Refer to Indicator 1.2.1.
		What does this mean? Anyone could work around this. How can you prove a		2	Task group has reviewed the comment and believes that the Indicator 1.2.1 and the	Refer to Ind. 1.2.1 & PM 1.2 Guidance - SFI Section 6 Guidance

		rare species if the conversion has already happened?			corresponding guidance for PM 1.2 address the comment.	
c.	**Does not create significant long-term adverse impacts on Forests with Exceptional Conservation Values , old-growth forests, forests critical to threatened**					
	1.2.3 Who decides what significant long-term impacts are?	Too open ended.		2	Task group has reviewed the comment and believes that the Indicator 1.2.1 and the corresponding guidance for PM 1.2 address the comment.	Refer to Ind. 1.2.1 & PM 1.2 Guidance - SFI Section 6 Guidance
	Drop	Covered in various PM's.	Drop	2	Task group disagrees with the comment and believes Indicator 1.2.1 should be retained.	Refer to Indicator 1.2.1.
	What is the age definition of “old-growth” – 60, 120 years, etc.?			3	Term old-growth is defined in Section 13.	None
	Terms are vague; it is problematic to determine impacts consistently across regions (regions have different definitions for these terms, particularly “old growth”)			3	Comment relates to comment above at Line 124.	None
	Remove indicator	Indicator 3 is redundant and/or potentially in conflict with the requirements of Indicators 4.2.1, 4.2.2 and 4.2.3, and PM 6.1. The term "significant" is not defined and could be difficult to assess.	None - remove indicator	2	Task group disagrees with the comment and believes that Performance Measure 4.2 and Indicator 1.2.1 addresses the issue described.	Refer to Indicator 1.2.1 and PM 4.2
	This indicator simply repeats a number of other indicators and objectives	Simplify interpretation by removing redundency	Delete this indicator	2	Task group disagrees with the comment and believes Indicator 1.2.1 should be retained.	Refer to Indicator 1.2.1.
	The current interpretation of Indicator 3 suggests that converting one forest type to another forest type may not be permitted if the conversion has the potential to cause long-term adverse effects to old growth forests.	Currently within the Interior B.C Region, there is a legislative requirement to harvest, maintain and manage Old Growth Forests at the tenure (landscape) level, which includes harvesting. Therefore, there is concern that Program Participants who are required by law to manage Old Growth Forest areas (referred to as Old Growth Management Areas in B.C, OGMA’s) may in fact be in non-compliance with this requirement. Also, as written, Indicator 3, and 4c suggests or infers that monitoring of ecological impacts will be expected if forest conversion takes place. The costs associated with monitoring are high and the financial resources needed to continue monitoring over the long-term will be required in order to satisfy the requirements of this indicator.	Remove Indicator 3, as indicator 4 c) provides for that multi-scale assessment. Or, SFI needs to provide further guidance related to forest conversions requirements. The current definition of stand type refers to conversion at the stand or harvest block level but that may be very difficult to achieve; definition would be better suited to consider forest conversion at the landscape scale. Conversion should consider balancing forest types at the landscape scale based on species composition and age classes and should exclude natural conversions driven by natural succession.	2	Task group has reviewed the comment and believes that the Indicator 1.2.1 and the corresponding guidance for PM 1.2 address the comment.	Refer to Ind. 1.2.1 & PM 1.2 Guidance - SFI Section 6 Guidance
	Delete. Redundant with Objective 4 and 6.	Delete. Redundant with Objective 4 and 6.	Delete. Redundant with Objective 4 and 6.	2	Task group disagrees with the comment and believes that Indicator 1.2.1, Objective 4 and Objective 6 are different in their focus and that Indicator 1.2.1 should be retained.	Refer to Indicator 1.2.1 and Objectives 4 and 6.
	This is a duplication of this requirement caused from the shall not... unless process.	The requirement is already in 4.2.2, 4.2.3, 4.2.1 and objective 6.	Remove.	2	Task group disagrees with the comment and believes that Indicator 1.2.1, Objective 4 and Objective 6 are different in their focus and that Indicator 1.2.1 should be retained.	Refer to Indicator 1.2.1 and Objectives 4 and 6.

This is poorly written and completely open for interpretation linking the different types of forest ecosystems, their age classes and the public resources (i.e. wildlife) that may use them as part of their habitat. The ability to harvest old growth, and further forest harvesting in general can be stretched by industry antagonists to say all activities have a 'long term' adverse impact. Also, forests critical to threatened and endangered species can be widely interpreted.	This can lead to a significant reduction in harvest opportunity for regions of high biodiversity.	Does not create significant adverse impacts on scientifically derived habitats necessary for the survival of FECVs.	2	Task group disagrees with the comment and believes that Performance Measure 4.2 and Indicator 1.2.1 addresses the issue described.	Refer to Indicator 1.2.1 and PM 4.2

Indicator 1.2.2: In the limited situations where a different *forest type* condition might be justified, an assessment considers
a. Productivity/Stand Quality conditions and impacts including economic values
b. Specific ecosystem issues related to the site such as invasive species, insect/disease issues, riparian protection needs and others as appropriate to site including regeneration challenges
c. Ecological impacts of the conversion including a review at the site and landscape scale as well as consideration for any appropriate mitigation measures.

Drop	Not necessary	Drop	2	Task group disagrees with the comment and believes that Indicator 1.2.2 should be retained.	Refer to Indicator 1.2.2
What is considered limited? Is this really limited if justified or still allows land owner to do what they want			2	Task group has reviewed the comment and believes that the Indicator 1.2.2 and the corresponding guidance for PM 1.2 address the comment.	Refer to Ind. 1.2.2 & PM 1.2 Guidance - SFI Section 6 Guidance
This could justify changing all hard wood to soft wood. What about diseased areas without production value? At what scale? This could allow huge conversion.			2	Task group has reviewed the comment and believes that the Indicator 1.2.2 and the corresponding guidance for PM 1.2 address the comment.	Refer to Ind. 1.2.2 & PM 1.2 Guidance - SFI Section 6 Guidance
“In the limited situation” is confusing. What is meant by this?	Clarify what a limited situation is. Define or quantify		2	Task group has reviewed the comment and believes that the Indicator 1.2.2 and the corresponding guidance for PM 1.2 address the comment. Use of the phrase “limited situations” has been removed from Ind. 1.2.2.	Refer to Ind. 1.2.2 & PM 1.2 Guidance - SFI Section 6 Guidance
Would suggest deleting "limited".	Due mostly to spruce budworm, Maine lost 1.75 million acres of spruce-fir type between 1980 and 1995, both from direct mortality and from salvage harvesting. Northern hardwoods and aspen-birch both gained large acreages, often on sites better suited to spruce-fir. It is often good management to move these hardwood stands back toward their pre-epidemic conditions, and the same is true for stands preferentially harvested for softwood when hardwood pulp markets were poor to nonexistent.	Delete "limited"	2	Task group has reviewed the comment and believes that the Indicator 1.2.2 and the corresponding guidance for PM 1.2 address the comment. Use of the phrase “limited situations” has been removed from Ind. 1.2.2.	Refer to Ind. 1.2.2 & PM 1.2 Guidance - SFI Section 6 Guidance
When does accepted practice become the standard?	in some areas there are undesirable species that occur and sites may be converted through harvesting or planting. (e.g., beech stands in the north eastern U.S.) Conversion of balsam fir areas to spruce or hardwoods. Stand types may change by natural process when tolerant species are removed and intolerants proliferate.	"Except where stand conversions are the accepted practice justification for forest type conversion might consider..."	2	Task group has reviewed the comment and believes that the Indicator 1.2.2 and the corresponding guidance for PM 1.2 address the comment.	Refer to Ind. 1.2.2 & PM 1.2 Guidance - SFI Section 6 Guidance
It is not necessary for the standard to define frequency of conversion for a landowner (i.e. "in the limited situations"). Ultimately, if a landowner chooses to convert, that is his/her choice. When that choice is made, justified scenarios are listed. We support the scenarios listed.	The changes we are proposing eliminate from the text of the standard the qualifying clause, as it is unnecessary.	4. Where a Program Participant intends to convert to a different forest type, they shall conduct an assessment that considers: a. Productivity/Stand Quality Conditions and impacts including economic values	2	Task group has reviewed the comment and believes that the Indicator 1.2.2 and the corresponding guidance for PM 1.2 address the comment.	Refer to Ind. 1.2.2 & PM 1.2 Guidance - SFI Section 6 Guidance

			b. Specific ecosystem issues related to the site such as invasive species, insect/disease issues, riparian protection needs and others as appropriate to site including regeneration challenges c. Ecological impacts of the conversion including a review at the site and landscape scale as well as consideration of any appropriate mitigation measures.			
Assessment could add administrative cost & efforts - and it isn't clear what level of assessment would be needed. And in many cases a different forest type may be justified.	Delete this indicator - as long as indicators 1-3 are met - the primary risks are being avoided. There is not necessarily anything wrong with forest type conversions in many cases where the first 3 indicators are met and this indicator would add unnecessary burden.	Delete this indicator.	2	Task group disagrees with the comment and believes that Indicator 1.2.2 should be retained.	Refer to Ind. 1.2.2.
While the rate of conversion of natural forests to plantations has slowed markedly, it is still an issue in certain parts of the country. While SFI has added language around conversion, in practice, it only serves to prohibit conversion in places where it's illegal or in rare forest types or RT&E species habitat, areas which were presumably protected under any standard. The ATFS standard, which SFI recognizes, also does not have a specific prohibition on forest conversion. SFI has added language to address PEFC ST 1003:2010 requirements, "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) Unfortunately, the justification language makes the prohibition almost meaningless. If there were no economic justification for conversion, it would not happen in most cases.	This justification language makes the indicator essentially moot.	1.2.2 Would not convert native forest types; and and 1.2.4 In the limited situations where a different forest type condition might be justified, an assessment considers: a. Specific ecosystem issues related to the site such as invasive species, insect/disease issues, riparian protection needs and others as appropriate to site including regeneration challenges c. Ecological impacts of the conversion including a review at the site and landscape scale as well as consideration for any appropriate mitigation measures	2	Task group has reviewed the comment and believes that the Indicators 1.2.1 & 1.2.2 and the corresponding guidance for PM 1.2 address the comment.	Refer to Ind. 1.2.2 & PM 1.2 Guidance - SFI Section 6 Guidance
Economics should not be the sole criteria for justify conversion of native forest types to plantations.	While the overall rate of conversion has slowed, this remains conversion of native forests remains an issue in some parts of North America.	Delete 1.2.4.a. Productivity/Stand Quality conditions and impacts including economic values	2	Task Group has reviewed the comment but decided to retain the language in Ind. 1.2.2.	Refer to Indicator 1.2.2.
It is inappropriate for SFI to automatically assume that there are only "limited situations" under which forest type conversion "might be" justified. See earlier comments. Although a-c do cover a wide variety of situations, an assessment would still be required. Other elements of the SFI standard adequately address this.	It is inappropriate for SFI to automatically assume that there are only "limited situations" under which forest type conversion is justified. See earlier comments. Although a-c do cover a wide variety of situations, an assessment would still be required. Other elements of the SFI standard adequately address this.	Delete.	2	Task group disagrees with the comment and believes that Indicator 1.2.2 should be retained.	Refer to Ind. 1.2.2.
While we note the new language in performance measures 1.2 and 1.3 related to conversion, these changes do not sufficiently safeguard against ecologically unsound conversion.	1.2.4a reads that conversion could be allowed solely for economic reasons.	Remove 1.2.4a	2	Task group has reviewed the comment. Comment misses the fact that 1.2.2 (a) – (c) must be addressed and not simply 1.2.2 (a) in isolation.	Refer to Ind. 1.2.2.
		Remove	2	Task group disagrees with the comment and believes that Indicator 1.2.2 should be retained.	Refer to Ind. 1.2.2.
This goes WAY beyond what matters for demonstrating forest sustainability.	Do we offer this same consideration to developers and homeowners?	Remove statement.	2	Task group disagrees with the comment and believes that Indicator 1.2.2 should be retained.	Refer to Ind. 1.2.2.

Performance Measure 1.3. *Certified Program Participants* shall not have within the scope of their certification to this SFI Standard, forest lands that have been converted to non-forest land use.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
Not clear if there is a limit or specific amount of land that can be converted.			2	Task group has reviewed the comment and believes that the Performance Measure 1.3 and the corresponding guidance for PM 1.3 address the comment.	Refer to PM 1.3 & PM 1.3 Guidance - SFI Section 6 Guidance
This doesn't allow for small amount of conversion – challenging to avoid all conversion (e.g., cranberry bogs)	Add an acceptable de minimus allowance		2	Task group has reviewed the comment and believes that the Performance Measure 1.3 and the corresponding guidance for PM 1.3 address the comment.	Refer to PM 1.3 & PM 1.3 Guidance - SFI Section 6 Guidance
Sounds like an oxymoron to me. How can land that has been converted to non-forest land use be certified forest land?			2	Task group has reviewed the comment and believes that the Performance Measure 1.3 and the corresponding guidance for PM 1.3 address the comment.	Refer to PM 1.3 & PM 1.3 Guidance - SFI Section 6 Guidance
Intent of this change is good, to prevent certification of lands which are, or in the future may be managed unsustainably for non-forest uses. This may be difficult to audit. What time frame will determine "in the future"? Perhaps include some examples of what is NOT allowed & determine time frames.	This needs to be defined more concretely for auditing purposes. Also it is unclear just what uses would fall under "non-forest uses". How about recreational facilities that complement the land base? Some questions remain.	This indicator excludes infrastructure that is complementary to the certified lands and aids in achieving the objectives of the land base. Conversions of ___% of the land base require reporting and updating of the certificate.	2	Task group has reviewed the comment and believes that the Performance Measure 1.3 and the corresponding guidance for PM 1.3 address the comment.	Refer to PM 1.3 & PM 1.3 Guidance - SFI Section 6 Guidance
Intent is good, to prevent certification of lands which are converted to non-forest uses generally. However this may be difficult to audit. And other cases of conversion may be justified (e.g development of campground area, etc). What time frame will apply to require participants to amend their scope - or reforest lands? Perhaps include some examples of what is NOT allowed & determine time frames.	Intent is good, to prevent certification of lands which are converted to non-forest uses generally. However this may be difficult to audit. And other cases of conversion may be justified (e.g development of campground area, utility easements, etc). What about recently acquired lands that havce been converted to non-forest or the conversion was out of their control (e.g. utility easements) What time frame will apply to require participants to amend their scope - or reforest lands? Perhaps include some examples of what is NOT allowed & determine time frames.	Perhaps create a threshold (~5%) of lands converted to non-forest use to trigger removal from scope - rather than all cases.	2	Task group has reviewed the comment and believes that the Performance Measure 1.3 and the corresponding guidance for PM 1.3 address the comment.	Refer to PM 1.3 & PM 1.3 Guidance - SFI Section 6 Guidance
This performance measure should be expanded to include unsustainable forestry practices including overharvest or final harvest without regeneration with the intent to sell the land.	Conversion to non-forest, high grading, and overharvest or final harvest without regeneration with the intent to sell the lands undermines the entire SFI scheme.	...shall not have within the scope of their certification to this SFI Standard, forest lands that have been converted to non-forest land use, subject to destructive cutting such as high grading where the remaining stand is no longer adequately stocked with quality stems of desirable species, or final harvest without an effective plan for adequate regeneration.	2	Task group has reviewed the comment and believes that the Performance Measure 1.3 and the corresponding guidance for PM 1.3 address the comment.	Refer to PM 1.3 & PM 1.3 Guidance - SFI Section 6 Guidance

	We agree with the underlying intent here, but the PM and indicator language needs to be reworked and clarified. There are really two issues here that should be covered: 1) SFI should not be certifying final harvests that occur just prior to conversion ... nor should lands converted be kept in the FM certificate. 2) Additionally, SFI should not be certifying intensive harvests (often with little/no regeneration efforts) that can occur just prior to sale to another forest landowner. This situation, however, is adequately covered with this new PM ... nor is it an easy issue to enforce or audit against. Once it becomes clear the forest is not being regenerated and/or is sold, SFI audits and certification are irrelevant and too late to address the harvest activities.	This PM and indicators will likely not adequately address the underlying intent. Need to make language more auditable and add indicators to address the second scenario mentioned in the "comment field."	Add additional indicators and clarify language.	2	Task group has reviewed the comment and believes that the Performance Measure 1.3 and the corresponding guidance for PM 1.3 address the comment.	Refer to PM 1.3 & PM 1.3 Guidance - SFI Section 6 Guidance
	This reads that conversion could be allowed solely for economic reasons (PM 1.2.4.a), or that conversions could merely be cut out of the certified concession area (PM 1.3) while the remaining land is still certified.			2	Task group has reviewed the comment and believes that the Performance Measure 1.3 and the corresponding guidance for PM 1.3 address the comment. Also, comment misses the fact that 1.2.2 (a) – (c) must be addressed and not simply 1.2.2 (a) in isolation.	Refer to Ind. 1.2.2, PM 1.3 & PM 1.3 Guidance - SFI Section 6 Guidance
	It would be helpful to provide further definition of what constitutes certifiable "forest land" vs. a non-forest land use.	In reality, forest land is a mosaic of land with and without trees (e.g., brushlands, wetlands, grasslands). Excluding these latter "forest" types (that don't have trees) from certification is currently not done (nor would it be advisable). Likewise, if there are management activities that seek to restore brush or more open lands (for wildlife habitat) within the forest mosaic, these should not have to be removed from the scope of the certificate. There are clearly some non-forest uses SFI has in mind to exclude from the scope of certificates. It would be helpful to provide specific examples or some sort of definition in section 13.		2	Task group has reviewed the comment and believes that the Performance Measure 1.3 and the corresponding guidance for PM 1.3 address the comment.	Refer to PM 1.3 & PM 1.3 Guidance - SFI Section 6 Guidance
	SAF recognizes concerns that can arise with conversion of forest types, but changes in site conditions may demand that forest managers consider a number of options, including species conversion, to meet landowner objectives. Recognizing that Performance Measure 1.2.4 helps align SFI forest management requirements with PEFC, and that opportunity for expansion may be limited, SAF encourages the External Review Panel to consider broadening 1.2.4 to provide foresters the flexibility to develop management plans to capitalize on the potential of each site. To facilitate this change, Performance Measure 1.2.4 could stipulate that justifications for forest type conversion may include but not be limited to those listed in the draft 1.2.4 Performance Measure.			2	Task group has reviewed the comment and believes that the Performance Measure 1.3 and the corresponding guidance for PM 1.3 address the comment.	Refer to PM 1.3 & PM 1.3 Guidance - SFI Section 6 Guidance

	Many other entities convert forest lands to non-forest use; why should we be different	Ask the Bill Gates foundation how many acres of forest land that they cleared in the name of "world hunger"	Remove statement.	2	Task group disagrees with the comment and believes that Performance Measure 1.3 should be retained.	Refer to PM 1.3.

PM 1.3 Indicators:

	Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
1. Forest lands converted to other land uses shall not be certified to this SFI Standard. This does not include forest lands used for forest and wildlife management such as wildlife food plots or infrastructure such as forest roads, log processing areas, trails, etc.						
	Is unclear on what is allowed/not allowed. Legislation may require wood to flow from an SFI land base to the mill...how to address? Also does not address reclaimed land	In Alberta industrial salvage of non-forestry related dispositions can be a significant volume of harvested timber.	Forest lands converted to other uses shall be removed from the lands certified to SFI Standard.	2	Task group has reviewed the comment and believes that Ind. 1.3.1 and the corresponding guidance for PM 1.3 address the comment.	Refer to Ind.1.3.1 & PM 1.3 Guidance - SFI Section 6 Guidance
	Difficult to audit – Doesn't describe how or when?" Have been converted" is past tense.	Avoid audits popping up all the time. Add a threshold (example: under 5% at renewing certification; "If under 5% does not need to be audited")… OR change to "has been converted since the last audit"		2	Task group has reviewed the comment and believes that the Ind. 1.3.1 and the corresponding guidance for PM 1.3 address the comment.	Refer to Ind. 1.3.1 & PM 1.3 Guidance - SFI Section 6 Guidance
	Conversion to non-forest land-use – does not take into account conversions that have been undertaken for the betterment of the community – doesn't take into account the positive impact such a conversion might have – building of windmill parks, for instance.			2	Task group has reviewed the comment and believes that Ind. 1.3.1 and the corresponding guidance for PM 1.3 address the comment.	Refer to Ind. 1.3.1 & PM 1.3 Guidance - SFI Section 6 Guidance
	Is unclear on what is allowed/not allowed. Legislation may require wood to flow from an SFI landbase to the mill...how to address? Also does not address recliamed land	In Alberta industrial salvage of non-forestry related dispositions can be a significant volume of harvested timber.	Forest lands converted to other uses shall be removed from the lands certified to SFI Standard.	2	Task group has reviewed the comment and believes that Ind. 1.3.1 and the corresponding guidance for PM 1.3 address the comment.	Refer to Ind. 1.3.1 & PM 1.3 Guidance - SFI Section 6 Guidance
	Sounds like an oxymoron to me. How can land that has been converted to non-forest land use be certified forest land?			2	Task group has reviewed the comment and believes that Ind. 1.3.1 and the corresponding guidance for PM 1.3 address the comment.	Refer to Ind. 1.3.1 & PM 1.3 Guidance - SFI Section 6 Guidance
	Is use of forested wetlands for peat moss production to be considered forest conversion?	The use can eventually revert back to forest	peat moss production may be less impacting than forest roads and log processing areas	2	Task group has reviewed the comment and believes that Ind. 1.3.1 and the corresponding guidance for PM 1.3 address the comment.	Refer to Ind. 1.3.1 & PM 1.3 Guidance - SFI Section 6 Guidance
	How will utility-type easements be classed (ex. power line and gas line ROWs)? In many cases, they are used for access and wildlife plots. What about other small-acreage areas such as well pads? Small dirt/rock pits used for maintenance of internal forest roads? Will a participant and its GIS system have to have each of these small-acreage parcels deliniated so that this minimal acreage can be removed for reporting certified acres?			2	Task group has reviewed the comment and believes that Ind. 1.3.1 and the corresponding guidance for PM 1.3 address the comment.	Refer to Ind. 1.3.1 & PM 1.3 Guidance - SFI Section 6 Guidance
	This indicator only states what is not included.	It needs to say what is included as well.	Add: This includes converting forest for agriculture, industrial development other than on site processing or storage of primary forest products, or urban or residential development.	2	Task group has reviewed the comment and believes that Ind. 1.3.1 and the corresponding guidance for PM 1.3 address the comment.	Refer to Ind. 1.3.1 & PM 1.3 Guidance - SFI Section 6 Guidance
	We agree with the intent, however the indicator is not very auditable and still not address the concern that fiber harvested just prior to	Suggest adding several indicators that address the full suite of issues underlying this PM and	Rethink the idea behind the language and add specifics about the timing and reporting process for when	2	Task group has reviewed the comment and believes that Ind. 1.3.1 and the	Refer to Ind. 1.3.1 & PM 1.3 Guidance - SFI Section 6 Guidance

conversion/sale could still enter the market stream under the "SFI" label. Audits are unlikely to be timed so as to catch most of these situations. Once the harvest and conversion/sale is complete, SFI certification and audits are irrelevant / too late to have an impact. Need to rethink how to address this situation. What is the penalty for certificate holders who do not comply with this indicator? Additionally, how would this be audited? What is the timing and process for communicating the past/present/future conversions to auditors? What size / amount of conversion would warrant an audit or change to the certificate?	indicator. Suggest building in a threshold or certain amount which would trigger a change to one's certificate and/or would require a follow-up audit. In some cases, it is not realistic to expect that the forest manager is able to control all decisions related to conversion/sale ... nor is it practical to expect them to be knowledge or able to prevent all future conversions.	conversion is imminent or has already occurred.		corresponding guidance for PM 1.3 address the comment.	
This Indicator seems to be amiss from the holistic view of how forests are managed. For instance, forest road infrastructure is a key asset to the movement of people and products every day. It is also a liability to forest managers with respect to worker safety and the protection of water quality.	We request that Indicator 1.3.1 be revised to include forest infrastructure which is vital to our business and assessed as part of the auditing process, including roads and sorting facilities.	Forest lands converted to other land uses shall not be certified to this SFI Standard. This does not include forest lands used for forest and wildlife management and forest-related infrastructure such as forest roads, forest manufacturing sites and distribution sites.	2	Task group has reviewed the comment and believes that Ind. 1.3.1 and the corresponding guidance for PM 1.3 address the comment.	Refer to Ind. 1.3.1 & PM 1.3 Guidance - SFI Section 6 Guidance
This is better than what you have written as PM #1.3.	This is more definitive and understandable than PM # 1.3.	Replace this as PM #1.3	2	Task group has reviewed the comment and believes that Ind. 1.3.1 and the corresponding guidance for PM 1.3 address the comment.	Refer to Ind. 1.3.1 & PM 1.3 Guidance - SFI Section 6 Guidance
Is unclear on what is allowed/not allowed. Legislation may require wood to flow from an SFI land base to the mill...how to address? Also does not address reclaimed land	In Alberta industrial salvage of non-forestry related dispositions can be a significant volume of harvested timber.	Forest lands converted to other uses shall be removed from the lands certified to SFI Standard.	2	Task group has reviewed the comment and believes that Ind. 1.3.1 and the corresponding guidance for PM 1.3 address the comment.	Refer to Ind. 1.3.1 & PM 1.3 Guidance - SFI Section 6 Guidance
Difficult to audit – Doesn't describe how or when?" Have been converted" is past tense.	Avoid audits popping up all the time. Add a threshold (example: under 5% at renewing certification; "If under 5% does not need to be audited")… OR change to "has been converted since the last audit"		2	Task group has reviewed the comment and believes that Ind. 1.3.1 and the corresponding guidance for PM 1.3 address the comment.	Refer to Ind. 1.3.1 & PM 1.3 Guidance - SFI Section 6 Guidance
Conversion to non-forest land-use – does not take into account conversions that have been undertaken for the betterment of the community – doesn't take into account the positive impact such a conversion might have – building of windmill parks, for instance.			2	Task group has reviewed the comment and believes that Ind. 1.3.1 and the corresponding guidance for PM 1.3 address the comment.	Refer to Ind. 1.3.1 & PM 1.3 Guidance - SFI Section 6 Guidance
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 landbase 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. *Proposed changes to the SFI Standard required*			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. Forest certification programs certify adherence to sustainable forestry practices. Forestland conversion to other forest uses cannot be certified to a sustainable forestry standard. These lands must be scoped out of the certification. Local governments regulate conversion of forestland to other uses. It is outside the scope of a forest certification program to attempt to regulate land use.	Refer to Performance Measure 1.2 and 1.3 and SFI Section 6 Guidance.

by the PEFC would not correct this situation, as the proposed new language would not prohibit conversion by companies being certified. Instead, the new language would simply exclude the converted areas from the forest lands being certified. Relevant SFI provisions (2010-2014): Various, including Indicators 2.1.2 and 4.1.1. *Proposed new language: Performance Measure 1.3.*					

Use this space to propose any removals or additions for Objective 1:

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
Addition: 1.4 Certified Program Participants shall manage lands converted from non-forest use and reclaimed back to forest use as productive forest land base.			2	Task Group reviewed the comment but believes that current PM 2.1.7 addresses afforestation.	Refer to Ind. 2.1.7.
Remove PM 1.2 entirely. PM 2.1 ind. 6 addresses these concerns sufficiently.			2	Task group disagrees with the comment and believes that Performance Measure 1.2 should be retained.	Refer to PM 1.2.
Need to remove the issues of conversion as stated. One- they don't make sense as stated, and two you leave landowners wide open to trying to defend any conversion of a natural stand to a plantation or use of any non-native species in the SFI program. Neither of these represents good forestry or good management. If the FSC program can justify certification of exotic eucalyptus plantations in South America you can certainly to the same in the United States.			2	Task group disagrees with the comment and believes that PM 1.2 should be retained.	Refer to PM 1.2.
PM 1.2 is unnecessary and should be deleted. There are a number of instances where forest conversion is warranted. While most / all are covered in the justifications provided, this PM stands to create an unnecessary administrative workload for no gain in sustainable forestry.			2	Task group disagrees with the comment and believes that PM 1.2 should be retained.	Refer to PM 1.2.

	Through an interpretation of the current standards, it was ruled that a forest manager/timberland owner, after being notified by the mineral owner of their intent to permit for mining, could count "the timber harvested ahead of that potential mining activity" as certified content. The property was being managed to SFI standards and the harvest occurred using SFI program protocols (planning, inspection, use of trained loggers, etc.) Actual acres impacted would be removed from the certificate once actual mining activity began. Manager would follow regen and greenup procedures on any acreage under the notice not impacted by the actual mining operation. Does this interpretation still hold true in these new draft standards? Another question on land use conversion that I don't think has been addressed: Situation--A program forest manager/owner sold timber as certified content and timber is now under a sales contract or timber deed. Sometime later but prior to all timber being harvested, an event arises that will result in a land conversion (ex. land sales agreement made to a real estate developer who is planning a new subdivision). Is the timber still certified content since contract terms were finalized well prior? (In some cases, timberland owner would have legal title of timber until severed, while in other cases, the title for the timber would have passed to the buyer at the time of contract closing)			2	Task group has reviewed the comment and believes that Ind. 1.3.1 and the corresponding guidance for PM 1.3 address the comment.	Refer to Ind. 1.3.1 & PM 1.3 Guidance - SFI Section 6 Guidance
	Consider the addition of performance measure simply stating that "Forest lands converted to another land use are no longer eligible for SFI certification". We recommend that SFI establish thresholds of conversion that warrant different actions depending on the scope and scale of the conversion out of forest use.			2	Task group has reviewed the comment and believes that Ind. 1.3.1 and the corresponding guidance for PM 1.3 address the comment.	Refer to Ind. 1.3.1 & PM 1.3 Guidance - SFI Section 6 Guidance
	PM 1.2 is unnecessary and should be deleted. There are a many cases where forest conversion is warranted and given climate & forest health concerns even preferred. This PM stands to create an unnecessary administrative workload and minimal benefits to sustainable forestry.			2	Task group disagrees with the comment and believes that PM 1.2 should be retained.	Refer to PM 1.2.
	PM 1.3.2. Forest lands that are high graded shall not be certified to this SFI standard. (Note: add the high grading definition from the SAF Dictionary of forestry terms to the Standards Definitions section) PM 1.3.3. Forest lands that have final harvests without being effectively regenerated shall not be certified to this SFI standard. This includes lands that are harvested and sold.			2	Task group has reviewed the comment and believes that Ind. 1.3.1 and the corresponding guidance for PM 1.3 address the comment.	Refer to Ind. 1.3.1 & PM 1.3 Guidance - SFI Section 6 Guidance

Add additional indicators under PM 1.3 to address intensive final harvests prior to land sales to transition from one manager to another. There are instances where the land is technically not "converted to non-forest uses," but a final harvest occurs with little or no regeneration activities. This fiber would still enter the market as "SFI certified." Add flexibility to certify lands that may eventually (long-term) be converted to non-forest uses (i.e., mineral exploration) but in the meantime could and should be managed sustainably for forestry, wildlife, social, and economic benefits. Not all conversion can be prevented ... SFI should seek ways to influence the forest management until such time that conversion occurs.			2	Aligns with comments above related to final harvest.	None

Objective 2. Forest Productivity

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.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
Forget carbon storage. All you are doing is playing to the issues that are the flavor of the day. No one manages for carbon storage unless they are marketing that product. In that case they measure the tree and use accepted conversion factors to account for carbon.			3	General Comment.	None
Reforestation plans must now be documented and reflect consideration of appropriate ecological systems, forest health issues and legal issues.			3	Comment is supportive of the draft text.	Refer to Indicator 2.1.1.
Carbon storage has limited science based information behind it; nor do many practioners believe it has merit.	Carbon storage is a political football.	Remove "carbon storage" from the statement.	3	General Comment – task group does not agree with comment.	Refer to Objective 2
Objective 2 Forest Productivity - SFI 2010-2014 standard - Management of carbon values is a much broader issue than one mention in 'forest productivity' would indicate. The objective has no performance measure or indicator designed to protect natural high carbon storage value areas such as the Boreal and the Pacific, where significant tonnes of biogenic carbon are stored in ancient and endangered forests and soil. Include specific language to protect high carbon storage values and treat this as a conservation value that needs protecting. Simply counting carbon in growing second-growth forests is insufficient for meaningful sustainable forestry. Please see Kimberly Clark 's Life Cycle Analysis for a greater understanding of how to include carbon storages values into your counting. (http://www.sustainablebrands.com/news_and_views/suQply_chainfjennifer_elks/canopy_applauds_cutt ing-edge_lea_materials_tissue_gianLki)			2	Task Group has reviewed the comment and believes that the standard addresses the issue of retention of carbon stocks carbon stocks in several parts of the SFI 2015-2019 Forest Management Standard specifically in PM 2.1, PM 2.3, PM 4.1, PM 4.2, PM 4.3 and PM 4.4	Refer to SFI 2015-2019 Forest Management Standard PM 2.1, PM 2.3, PM, 4.1, PM 4.1, PM 4.2, PM 4.3 and PM 4.4.

Performance Measure 2.1. *Program Participant*s shall promptly reforest after final harvest.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
During the last Standard revision, the phrase "artificial regeneration" was purposefully changed to "planting" throughout PM 2.1. This decision should remain the norm during this revision process.	"Artificial" is a term that implies that something man-made. Planted trees, although put into the ground by man, are not man-made.	Replace "artificial" with "planted"	2	Comment is addressed by Ind. 2.1.1.	Refer to Ind. 2.1.1.

PM 2.1 Indicators:

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
1. Designation of all harvest areas for either *natural regeneration* or by *planting*.					
Add in direct seeding as an acceptable form of regeneration. Good change. It could be argued that this indicator is unnecessary as 2.1.2 already alludes to the reforestation requirement.	Direct seeding is a common form of regeneration.	..... for either natural regeneration or by planting or direct seeding.	2	Comment is addressed by Ind. 2.1.2.	Refer to Ind. 2.1.2.
We are supportive, but Indicator 2.1.1 would not seem necessary given indicator 2.1.2.			2	Task Group has reviewed the comment and combined the former Indicators 2.1.1 and 2.1.2 to create new Indicator 2.1.1.	Refer to Indicator 2.1.1.
Adding direct seeding as an acceptable form of regeneration is a good change.	Direct seeding is a viable regeneration techniques	..... for either natural or artificial (planting or direct seeding) regeneration.	2	Comment is addressed by Ind. 2.1.2.	Refer to Ind. 2.1.2.
Indicator language shown in survey is outdated. Taskforce group changed "planting" to "artificial (planting or direct seeding)." This language is more appropriate and should replace "planting" which is only one form of artificial regeneration.	Indicator language shown in survey is outdated. Taskforce group changed "planting" to "artificial (planting or direct seeding)." This language is more appropriate and should replace "planting" which is only one form of artificial regeneration.	Replace "planting" with language from taskforce group: "for either natural or artificial (planting or direct seeding) regeneration."	2	Task Group disagrees – Indicator 2.1.1 reverts to sue of the phrase *"natural, planted or direct seeded regeneration"*.	Refer to Ind. 2.1.1.
2. Documented reforestation plans and activities based on site-specific environmental ecological or forest health considerations or legal requirements. Where feasible artificial reforestation within two years or two planting seasons or by planned natural regeneration methods within five years.					
The five year requirement for natural is difficult to access in northern hardwoods. Regeneration is occurring but it is hard to measure and quantify success.			2	Task Group believes comment is addressed by Ind. 2.1.2.	Refer to Ind. 2.1.2.
	Most landowners reforest the year following harvest. Exception is federal govt. within two years is ok.		3	General Comment	None
Remove second sentence of indicator; "Where feasible artificial reforestation within two years or two planting seasons or by planned natural regeneration within five years."	Requirement is often inconsistent with ecologically appropriate and legally defined reforestation standards. Intent of objective is met by PM 2.1 and remaining indicator requirements.	Remove second sentence of indicator.	2	Task Group believes comment is addressed by Ind. 2.1.2.	Refer to Ind. 2.1.2.
Consider changing to one standard of five years for planting or natural	Sometimes one waits for natural regenerations to	Where feasible artificial or natural regeneration methods	2	Task Group believes comment is	Refer to Ind. 2.1.2.

regeneration.	take hold and it is unsuccessful. Alternatively, funding for plantatins may be limited and require delays due to economic conditions.	ensure restocking within five growing seasons.		addressed by Ind. 2.1.2.	
This indicator creates inequity between program participants in vastly different forest types throughout North America. For instance in British Columbia a two year regeneration delay is approximately 2% of a typical stand rotation, however in some southern US locations 2 years may be as high as 10% of a typical stand rotation. A variation of one year from the standard in BC would have minimal effect on long term productivity compared to a one year variance in the south.	Where participants manage public lands with legislated reforestation requirements, such as in BC, word the indicator to reflect compliance with that legislation. By pushing time frames to shorter periods, participants could be compelled to make decisions that compromise productivity (contrary to other indicators) by speculative ordering of seedlings based on harvest plans that are subject to change. When those changes occur, the seedlings get planted, but perhaps not in the most suitable sites or at optimum density.	On public land where legislation exists defining regeneration standards, match the legislative requirement. On other lands where legislative requirements do not exist, define the regeneration delay indicator as a percentage of typical rotation.	2	Task Group believes comment is addressed by Ind. 2.1.2.	Refer to Ind. 2.1.2.
Not sure why artificial and natural regeneration methods have different timelines.	Simplify to 5 years for both		2	Task Group believes comment is addressed by Ind. 2.1.2.	Refer to Ind. 2.1.2.
As Indicator 2.1.2 now reads, “Documented reforestation plans and activities based on site-specific environmental ecological or forest health considerations or legal requirements”. This requirement for documented, site-specific reforestation plans is new. SFI should revert to previous language or re-phrase this indicator.	The original purpose of this indicator was to ensure reforestation was completed on time except when there were extenuating circumstances. As written now, the emphasis has changed to documenting the planning process for reforestation on an individual site basis. The new language will require additional operational efforts to document a process that is already in place and effective without the paperwork.	Revert to previous language that emphasizes the true purpose of the indicator – to ensure reforestation (artificial within 2 years, natural within 5 years) except when delayed for valid reasons.	2	Task Group believes comment is addressed by Ind. 2.1.2.	Refer to Ind. 2.1.2.
We are supportive, but Indicator 2.1.1 would not seem necessary given indicator 2.1.2.			2	Task Group has reviewed the comment and combined the former Indicators 2.1.1 and 2.1.2 to create new Indicator 2.1.1.	Refer to Indicator 2.1.1.
Indicator should more explicitly allow for site level plans.	Indicator should more explicitly allow for site level plans - e.g. in annual work plan or in harvest plan/prescription plans to allow for efficiencies	"Documented plans or prescriptions address reforestation and....."	2	Task Group believes comment is addressed by Ind. 2.1.2.	Refer to Ind. 2.1.2.
Revert to old language	I don't understand why this is being changed. I don't recall any problems with the old language and this seems to actually weaken the reforestation requirement with "where feasible". Allowances have always been made when there are unusual circumstances, natural disasters, etc. In addition, SFI just switched from using the term "artificial reforestation" in the current standard. The standard had "planting" before 2005-2009 and switched to "artificial" then switched back to planting in 2010-2014. Stick with planted/planting. This is a better understood term with non foresters.	Language as exists in current standard.	2	Task Group reviewed comment but has developed new language for Indicator 2.1.1.	Refer to Indicator 2.1.1.
Good rewrite.	Adds clarity that 2 / 5 years is not a hard and fast rule.	NA	3	General Comment – supports revised Indicator 2.1.1.	Refer to Ind. 2.1.1.
Not clear as to what documentation is required, making this a subjective decision for auditors. There is no definition of "artificial reforestation." Does this mean getting trees in the ground or established seedlings at acceptible densities?	Potentially problematic if different auditors interpret adequate documentation differently. Getting initial trees planted in the ground within two years is substantially different from having		2	Task Group has reviewed the comment and combined the former Indicators 2.1.1 and 2.1.2 to create new Indicator 2.1.1. Task Group believes that new Ind.	Refer to Indicator 2.1.1.

	seedlings established (i.e., surviving) at planned or desired densities. 2 years is probably too short for the latter (MN law is 5 years).			2.1.1 addresses the comment.	
Very nice to see feasibility being taken into account			3	General Comment	None
2.1.2 – "two years or two planting seasons". These numbers are artificial; Canadian legislation sets the number of years for regeneration.		Remove the specific years and planting seasons OR add "or otherwise specified/consistent with legislation".	2	Task Group believes comment is addressed by Ind. 2.1.1.	Refer to Ind. 2.1.1.
The new language is vague and hard to understand			2	Task Group has reviewed the comment and combined the former Indicators 2.1.1 and 2.1.2 to create new Indicator 2.1.1. Task Group believes that new Ind. 2.1.1 addresses the comment.	Refer to Indicator 2.1.1.
"Site-specific" considerations adds work and paper. Is it necessary?	Use original language/leave as is		2	Task Group has reviewed the comment. However, it decided to combine the former Indicators 2.1.1 and 2.1.2 to create new Indicator 2.1.1.	Refer to Indicator 2.1.1.
	Use five years for both for consistency and to simplify		2	Task Group believes comment is addressed by Ind. 2.1.1.	Refer to Ind. 2.1.1.
MN state law requires reforestation in 5 years; SFI is not in line with MN state law.	Clarify purpose of the timing AND include flexibility for site and ecological conditions		2	Task Group believes comment is addressed by Ind. 2.1.1.	Refer to Ind. 2.1.1.
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*.					
Add in direct seeding as an acceptable form of regeneration	Direct seeding is a common form of regeneration.	.... for both planting, direct seeding and natural regeneration.	2	Comment addressed with Indicator 2.1.1 and 2.1.2.	Refer to Ind. 2.1.1 and 2.1.2.
4. Plantings of exotic trees species should avoid risk on native ecosystems.					
Not realistic, difficult	Remove "should avoid risk", instead use "minimize risk"; AND change "on" to "to"		2	Comment addressed by Indicator 2.1.3	Refer to Indicator 2.1.3.
How do you quantify avoidance of risks? Some would argue that any exotic presents a risk that could be quantified at some level.			2	Comment addressed by Indicator 2.1.3	Refer to Indicator 2.1.3.
The wording of this indicator makes it difficult to audit, and will open up the use of exotic tree species.	Ensure this indicator can be audited, and does not open up the use of exotic trees	Planting of exotic tree species is minimized, and only done after peer-reviewed scientific literature indicates its use does not pose risk to native ecosystems	2	Comment addressed by Indicator 2.1.3	Refer to Indicator 2.1.3.
Proposed changes to the SFI Standard would eliminate important language regarding exotic species. *Proposed changes to the Standard would eliminate the Standard's existing requirements to minimize plantings of exotic species, to document that any plantings pose minimal risk to ecosystems, and to participate in programs designed to limit the introduction and spread of invasive exotic species. The remaining language would only require that exotic species plantings "should" avoid risk to native ecosystems.* *Relevant proposed amended SFI provisions: Indicator 2.1.4 and Performance measure 4.3.*	None provided. No specific changes proposed.	None provided. No specific changes proposed.	2	Comment addressed by Indicator 2.1.3	Refer to Indicator 2.1.3.
This language is too loose to audit effectively. Opens up the ability to	Limit the establishment of exotic tree species	Planting of exotic tree species is minimized, and only	2	Comment addressed by Indicator 2.1.3	Refer to Indicator 2.1.3.

use exotic tree species.		done after peer-reviewed scientific literature indicates its use does not pose risk to native ecosystems			
With the addition of Objective 1 PM 1.2 regarding forest conversion Objective 2 P.M 2.1, Indicators 4 and 6 are redundant and not needed.		Drop indicators 4 and 6		Task Group has reviewed comment and agrees that existing Indicator 2.1.6 can be removed in view of new PM 1.2. However, Task Group believes that retaining the existing 2.1.4 should be retained.	Refer to new PM 1.2.
Change "avoid" to minimize	Hard to define/describe if something is "avoided"	...should minimize risk to...	2	Comment addressed by Indicator 2.1.3	Refer to Indicator 2.1.3.
It is not possible to avoid risk; suggest saying minimize risk. If risk is not known then a monitoring protocol for negative impacts must be implemented.	Documentation of minimal risk and a corresponding protocol for monitoring could allow the use of exotic species where risk is not known.	Plantings of exotic tree species should minimize risk on native ecosystems. If risk is not documented to be minimal then a monitoring protocol for negative impacts must be implemented.	2	Comment addressed by Indicator 2.1.3	Refer to Indicator 2.1.3.
Stick with current language	This change seems to weaken the standard	Keep current language	2	Task Group has reviewed comment but believes that the revised wording for Ind. 2.1.3 is more effective.	Refer to Indicator 2.1.3.
Replace "avoid risk" with previous language = "minimize risk." It is impossible (not to mention not auditable) to avoid all risk. Focus should be on minimizing risk.	Replace "avoid risk" with previous language = "minimize risk." It is impossible (not to mention not auditable) to avoid all risk. Focus should be on minimizing risk.	Replace "avoid risk" with previous language = "minimize risk."	2	Comment addressed by Indicator 2.1.3	Refer to Indicator 2.1.3.
This indicator is ambiguous and will be hard to audit. Also, objectives in response to climate change may push "exotic species" into an acceptable role in some systems.	Suggest rewording to "minimize risk" (i.e., not realistic to completely avoid risk), but this too will be hard to audit.		2	Comment addressed by Indicator 2.1.3	Refer to Indicator 2.1.3.
Why not change exotic species to "invasive species" or add it to the statement?	Invasive species are taking control of much private forest land in the south and more information needs to be shared about their awareness.	Add "invasive species" to this statement.	2	Task Group has reviewed comment but believes that reference to invasive species should be retained in PM 2.4. and not added to Ind. 2.1.3.	None
5. *Protection* of desirable or planned advanced natural regeneration during harvest.					
Exclude plantations in this group.	Sometimes limited desirable regeneration may be too costly to protect	Where natural regeneration is planned, protection of advanced regeneration of desirable species occurs during harvest.	2	Task Group believes that the existing wording for Ind. 2.14 is effective and does not support any change in wording.	None
6. *Planting programs* that consider potential ecological impacts of a different species or species mix from that which was harvested.					
Remove 2.1.6	Redundant with 1.2		2	Task Group has reviewed the comment and concurs. Existing Ind. 2.1.6 is to be removed and its requirements moved to PM 1.2.	Refer to PM 1.2.
How are “ecological impacts” assessed? Rare and ecologically significant are not easily defined.	Clarify these issues		2	Task Group believes that PM 1.2 addresses the comment.	Refer to PM 1.2.
Thought this was now covered by PM 1.2			2	Task Group believes that PM 1.2 addresses the comment.	Refer to PM 1.2.
It may be that historic forest practices removed species that are now being replanted.	In areas where mixed stands had one or two species removed, the stand type evolved to a "non-natural" condition.	Planting programs use species native to the region and planning programs have goals to ensure native species are present on the landscape.	2	Task Group believes that PM 1.2 addresses the comment.	Refer to PM 1.2.

With the addition of Objective 1 PM 1.2 regarding forest conversion Objective 2 P.M 2.1, Indicators 4 and 6 are redundant and not needed.		Drop indicators 4 and 6	2	Task Group believes that PM 1.2 addresses the comment.	Refer to PM 1.2.
This should be removed as it is addressed in PM 1.2	Based on current interpretation, this will be addressed with addition of PM 1.2	Remove this indicator	2	Task Group believes that PM 1.2 addresses the comment.	Refer to PM 1.2.
With the addition of Performance Measure 1.2 - conversion of forest types – Indicator 2.1.6 is no longer needed.	2.1.6 is redundant with 1.2	Delete 2.1.6	2	Task Group believes that PM 1.2 addresses the comment.	Refer to PM 1.2.
This would appear to be a bit redundant with the new indicator 2.1.2. This indicator also seems to imply that regeneration to a different species or species mix is inherently bad from a ecological standpoint. As noted in our comment on PM 1.2, this underlying assumption is not accurate in most cases in our management.	Indicator 2.1.2 requires plans based on ecological considerations. Indicator		2	Task Group has reviewed comment. Task Group believes that comment is addressed with the removal of existing Ind. 2.1.6 and its incorporation into PM 1.2 and the revised Ind. 2.1.2.	Refer to PM 1.2 and Ind. 2.1.2.
7. *Afforestation programs* that consider potential ecological impacts of the selection and *planting* of tree species in non-forested *landscapes*.					
Exclude plantations in this group.	Sometimes limited desirable regeneration may be too costly to protect	Where natural regeneration is planned, protection of advanced regeneration of desirable species occurs during harvest.	2	Task Group believes that the existing language for Ind. 2.1.5 (old 2.1.7) continues to be effective.	Refer Ind. 2.1.5.

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*.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
Chemicals have labels with regulated use; if following the label rates then legal and good forestry, don't need more. This could be interpreted as having to do less than label rates	Use different term OR clarify in Interpretations OR use "appropriate to achieve management objective" instead		2	Task Group believes that comment is addressed by Ind. 2.2.3. Chemical application rates *in accordance with the label instructions* is a legal requirement.	Refer to Ind. 2.2.3.
Performance Measure 2.2. SFI 2015-2019 standard. "Certified 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."	Exceed or at least match the FSC International, FSC Pacific Northwest and FSC Boreal standard guidelines as well as all national/state/provincial standards/rules (in order to minimize chemical use required to achieve management objectives, while protecting employees, neighbors, the public and the environment, including wildlife and aquatic habitat).		2	The Task Group has reviewed the comment and believes that the comment is addressed by the requirements at Indicator 2.2.4 (prohibition of WHO 1A and 1B chemicals) and Indicator 2.2.5 (banning use of Stockholm Chemicals).	Refer to SFI 2015-2019 Forest Management Standard Indicators 2.2.4 and 2.2.5.

PM 2.2 Indicators:

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
1. *Minimized* chemical use required to achieve management *objectives*.					
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.	None provided. No specific change proposed.	None provided. No specific change proposed.	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	Refer to language for Indicators 2.2.4 and 2.2.5

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. *Proposed changes to the Standard would prohibit the use of WHO Type 1A and 1B "extremely" and "highly hazardous" pesticides, "except where no viable alternative is available." This is an important improvement, as far as it goes. However, there are many highly problematic chemicals that are not listed as WHO 1A and 1B per se, including endocrine disrupters, chemicals that bioaccumulate, and others that are normally forbidden for use by more rigorous certification systems. Examples include the controversial pesticides Atrazine and 2,4-D. No guidance on "viable alternatives" is provided, and it seems unlikely that use of silvicultural practices that reduce the need for chemicals will be considered in this context.* • Relevant SFI provisions (2010-2014): Indicators 2.2.1 and 2.2.2. *Proposed new language: Indicator 2.2.4.*				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 the Task Group has recommended the prohibition of chemicals listed on the WHO 1A and 1B list and believes this addition does adequately address the comment.	
2. Use of *least-toxic* and *narrowest-spectrum pesticides* necessary to achieve management *objectives*.					
3. Use of pesticides registered for the intended use and applied in accordance with label requirements.					
		"...with label requirements by trained/qualified personnel."	2	Task Group believes comment is addressed by Ind. 2.2.7. and 2.2.8.	Refer to Ind. 2.2.7 and 2.2.8.
4. The World Health Organization (WHO) type 1A and 1B pesticides shall be prohibited, except where no other viable alternative is available.					
Can SFI provide readily available information on these types of pesticides (1A, 1B) to aid SFI participants.			1	Link to WHO and Stockholm Convention websites listing the respective chemicals will be available to PP via SFI website.	Refer to Ind. 2.2.4 and 2.2.5.
Need to ensure this does not violate state and federal standards. Could create contradictions	Interject SICs as part of waiver process for "exceptions"		2	Task Group is reviewing how these exceptions would be processed. Conduct of the review will need to be independent of the Program Participant making the request.	None
Chemicals – are nurseries excluded? Where does it state that?			3	Yes – chemicals used in nursery operations are out of scope for SFI Section 2.	None

WHO list includes strychnine that is used for pocket gophers. "where no other viable alternatives is available" – what is this process?	Rely on U.S. chemical laws…OR Need more clarification on this.		2	Task Group is reviewing how these exceptions would be processed. Conduct of the review will need to be independent of the Program Participant making the request.	None
WHO chemicals are difficult to find on website. Include reference or website.			1	Link to WHO and Stockholm Convention websites listing the respective chemicals will be available to Program Participant via SFI website.	Refer to Ind. 2.2.4 and 2.2.5.
2.2.4 – "World Health organization (WHO) type 1A and 1B pesticides". It is difficult to locate or access the WHO 1A and 1B list.	Provide the list on the SFI website.		1	Link to WHO and Stockholm Convention websites listing the respective chemicals will be available to Program Participant via SFI website.	Refer to Ind. 2.2.4 and 2.2.5.
The World Health Organization list is hard to understand because it is listed in scientific terms only	Develop a translation, a cheat-sheet relating chemical name/brand name to make this understandable to participants.		1	Link to WHO and Stockholm Convention websites listing the respective chemicals will be available to Program Participant via SFI website.	Refer to Ind. 2.2.4 and 2.2.5.
This is hard to find and hard to interpret. Make it easy to find and understandable.			1	Link to WHO and Stockholm Convention websites listing the respective chemicals will be available to Program Participant via SFI website.	Refer to Ind. 2.2.4 and 2.2.5.
Is the list set in time? What if the list grows, will a date be set for the list? Generics could become available for brand names. This could cause confusion.			1	Link to WHO and Stockholm Convention websites listing the respective chemicals will be available to Program Participants via SFI website. However, Program Participant will need to ensure (via periodic monitoring of the lists) that they are in compliance with these lists.	Refer to Ind. 2.2.4 and 2.2.5.
What happens if it changes? What is the process for adding/removing chemicals from the WHO list? How would program participants be informed? Would SFI automatically adopt the new list?			1	Link to WHO and Stockholm Convention websites listing the respective chemicals will be available to Program Participants via SFI website. However, Program Participant will need to ensure (via periodic monitoring of the lists) that they are in compliance with these lists.	Refer to Ind. 2.2.4 and 2.2.5.
Grateful that SFI recognizes the need for exemptions and flexibility without excessive rigor for approval. BUT, concerned about the framework and timing of seeking SFI approval.	Clarify SFI process and timing for seeking approval if/when needing to use one of the WHO pesticides		2	Task Group is reviewing how these exceptions would be processed. Conduct of the review will need to be independent of the Program Participant making the request.	None
I searched for the list of type 1A and type 1B pesticides and could not find it.	Participants need to have easy access to this list to ensure and demonstrate compliance with this indicator	Include web link or reference to where participant can access these lists.	1	Link to WHO and Stockholm Convention websites listing the respective chemicals will be available to Program Participant via SFI website.	Refer to Ind. 2.2.4 and 2.2.5.
SFI should allow for blanket derogations for the use of WHO type 1A and 1B pesticides in accordance with the legal requirements of well-regulated areas.	The United States Environmental Protection Agency (EPA) has the regulatory structure and processes in place to ensure that applied chemicals adhere to environmental laws and executive orders such as the Endangered Species Act (ESA), Clean Air Act (CAA), Clean Water Act (CWA), Federal Insecticide, Fungicide, and	The World Health Organization (WHO) type 1A and 1B pesticides shall be prohibited, except where no other viable alternative is available, where pesticide application is governmentally registered, approved and regulated, or in an approved derogation is in place.	2	Task Group believes that comment is addressed by Indicators 2.2.4 and 2.2.5	Refer to Ind. 2.2.4 and 2.2.5.

	Rodenticide Act (FIFRA), and Toxic Substance Control Act (TSCA). EPA has a process in place for public participation and a review process for the use of existing registered pesticides and potential newly registered pesticides. EPA also participates in a wide variety of international activities, such as regulatory agreements and coordination work. The Pesticide Management Division of the Washington State Department of Agriculture (WSDA) is responsible for ensuring that pesticides are used safely and legally. To accomplish this responsibility, WSDA performs a number of activities including registering pesticides, licensing pesticide applicators, dealers and consultants, investigating complaints of possible misuse, maintaining a registry of pesticide sensitive individuals and administering a waste pesticide collection program. These duties are performed under the authority of the Washington Pesticide Control Act (15.58 RCW), the Washington Pesticide Application Act (17.21 RCW), the General Pesticide Rules (WAC 16-228), the Worker Protection Standard (WAC 16-233) and a number of pesticide and/or county specific regulations. In addition, WA State has regulations (WAC 222-38) in place to regulate the handling, storage and application of chemicals in such a way that the public health, lands, fish, wildlife, aquatic habitat, wetland and riparian management zone vegetation will not be significantly damaged, and water quality will not be endangered by contamination.				
It would be beneficial for Program Participants to have a reference of the Type 1A and 1B Pesticides either through a web link to the WHO listing or through a list/table provided somewhere in the SFI Standard, perhaps in the Guidance section or within the Definitions section. It would also be beneficial to have a cross reference table that shows which products (brand names and generics) contain the 1A and 1B pesticides.		It would be beneficial for Program Participants to have a reference of the Type 1A and 1B Pesticides either through a web link to the WHO listing or through a list/table provided somewhere in the SFI Standard, perhaps in the Guidance section or within the Definitions section. It would also be beneficial to have a cross reference table that shows which products (brand names and generics) contain the 1A and 1B pesticides.	1	Link to WHO and Stockholm Convention websites listing the respective chemicals will be available to Program Participants via SFI website. However, Program Participant will need to ensure (via periodic monitoring of the lists) that they are in compliance with these lists.	Refer to Ind. 2.2.4 and 2.2.5.
It is unclear how "no other viable alternative" would be interpreted/audited.	It is unclear how "no other viable alternative" would be interpreted/audited.	No good suggestion.	2	Task Group has reviewed the comment. The requirement to address use of WHO 1A and 1B and Stockholm Convention is an endorsement requirement of Program for the Endorsement of Forest Certification (PEFC) International for the SFI forest management requirements. Task Group is reviewing how these exceptions to the prohibition on WHO 1A and 1B chemicals would be processed. Conduct of the review will need to be independent of the Program Participant making the request.	None
We are concerned about the process that the WHO will use to add to	We believe that this change should not be made		3	Adoption of this requirement is to meet	None

their prohibited list. We don't have a good understanding of the process.	unless it is absolutely necessary to maintain PEFC recognition of the SFI Standard.			PEFC endorsement requirements.	
Add Stockholm Convention to meet PEFC requirements	Meet PEFC requirements	The World Health Organization (WHO) type 1A and 1B and Stockholm Convention pesticides shall be prohibited, except where no other viable alternative is available.	2	Task Group believes that comment is addressed by Indicators 2.2.4 and 2.2.5	Refer to Ind. 2.2.4 and 2.2.5.
Agree with current list, however concerned about what the process will be to review and evaluate future changes/additions to the WHO 1A and 1B chemicals. How will program participants be informed of these changes and will there be an opportunity to influence and comment on changes to the WHO lists? SFI needs to clarify what the process will be for communicating and accepting exceptions "where no other viable alternative is available." Who will determine that (auditors, program participants, SFI, etc.)?	Agree with current list, however concerned about what the process will be to review and evaluate future changes/additions to the WHO 1A and 1B chemicals. How will program participants be informed of these changes and will there be an opportunity to influence and comment on changes to the WHO lists? SFI needs to clarify what the process will be for communicating and accepting exceptions "where no other viable alternative is available." Who will determine that (auditors, program participants, SFI, etc.)?	Clarify process and timing and authority.	2	Link to WHO and Stockholm Convention websites listing the respective chemicals will be available to Program Participants via SFI website. However, Program Participant will need to ensure (via periodic monitoring of the lists) that they are in compliance with these lists. Task Group is reviewing how these exceptions to the prohibition on WHO 1A and 1B chemicals would be processed. Conduct of the review will need to be independent of the Program Participant making the request.	Refer to Ind. 2.2.4 and 2.2.5.
The current WHO lists appear to be OK. However, not being familiar with the WHO process for revising this list, it may not always remain that way.		None. Just maintaining the ability to revisit connection to the WHO lists if/when they change.	1	Link to WHO and Stockholm Convention websites listing the respective chemicals will be available to Program Participant via SFI website.	Refer to Ind. 2.2.4 and 2.2.5.
Any reference to a specific list or measurable should be directly included as an appendix to the Standard. This minimizes confusion for Program Participants and auditing teams.	Current language is acceptable if the list is attached as an appendix to the Standard which is also referenced here.		1	Link to WHO and Stockholm Convention websites listing the respective chemicals will be available to Program Participants via SFI website. However, Program Participant will need to ensure (via periodic monitoring of the lists) that they are in compliance with these lists.	None
How do chemicals get added to this list? SFI is a 5 year standard, can chemicals be added to the banned list at any time? Who decides what chemicals get listed?		Something that include a date, such as "type 1A and 1B pesticides listed as of 1/1/15 shall be prohibited..."	2	Task Group believes that comment is addressed by Indicators 2.2.4 and 2.2.5. Link to WHO and Stockholm Convention websites listing the respective chemicals will be available to Program Participants via SFI website. However, Program Participant will need to ensure (via periodic monitoring of the lists) that they are in compliance with these lists.	Refer to Ind. 2.2.4 and 2.2.5.
Does the WHO restrict hexazinone products?	Are there any herbicides listed as type 1A and 1B that would limit current timber management prescriptions?	I would suggest that if it necessary to prohibit certain pesticide uses, then you should list what they are.	3	2012 Survey of Program Participants indicated that removal of WHO 1A and 1B chemicals would not significantly impact forest management operations.	None

6. Supervision of forest chemical applications by state- or provincial-trained or certified applicators.

7. 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 transportation and 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.

	Need to insert "transportation methods"		2	Comment addressed in Indicator 2.2.8.	Refer to Ind. 2.2.8.
Addition of transportation	Does this mean for chemicals being transported by the program participant vs those being transported by chemical contractors or both?		2	Comment addressed in Indicator 2.2.8.	Refer to Ind. 2.2.8.
Good addition to expand to "transportation" of chemicals.	Good addition to expand to "transportation" of chemicals.		2	Comment addressed in Indicator 2.2.8.	Refer to Ind. 2.2.8.

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

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
Forest managers generally work to restore soils after significant disturbances, such as landing use, road washouts, or excessive rutting. This isn't mentioned anywhere in the standard.	To get recognition for good practices.	Add a new Indicator 8: 8. Program to restore soil productivity after significant disturbance events (e.g., on landings, after road washouts or excessive rutting).	2	Task group has reviewed the comment and believes that the requirements for PM 2.3 continue to be effective and therefore there is no need to add an additional Indicator.	Refer to PM 2.3.
This Performance should explicitly reference forest best management practices. An indicator equivalent to Indicator 3.1.1 is needed for Performance Measure 2.3 if the standard is going to address soil and water quality BMPs in separate parts of the standard.	The language of the Performance Measure should be consistent with commonly used terminology. Soil and Water Quality BMPs are commonly addressed in one publication by many states, and a specific reference to BMPs is needed for this Performance Measure in order to ensure proper conformance to its intent.	Performance Measure 2.3. Certified Program Participants shall implement forest best management practices to protect and maintain forest and soil productivity. Proposed new Indicator 2.3.1. Program to implement federal, state or provincial soil and water quality best management practices during all phases of management activities.	2	Task group has reviewed the comment and believes that the requirements for PM 2.3 continue to be effective and therefore there is no need to add an additional a revised Indicator 2.3.1.	Refer to PM 2.3.
Well written, no comment!					None

PM 2.3 Indicators:

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
1. Use of soils maps where available to identify soils vulnerable to compaction and use of appropriate methods to avoid excessive soil disturbance.					
Duplicative with #2. Eliminate this one.	The "process" most commonly will rely on soil survey data and maps, but could be something else where maps don't exist or are not reliable.	Eliminate and re-number.	8	Task Groups concurs with comment and has combined existing Indicators 2.3.1 and 2.3.2 in a new Indicator 2.3.1.	Refer to Ind. 2.3.1.
Indicators 2.3.1 and 2.3.2 could be combined as the wording is repeated.	Streamlining suggestion.	Process including use of soil maps, where available, to identify soils vulnerable to compaction and use of	2	Task Groups concurs with comment and has combined existing Indicators 2.3.1 and	Refer to Ind. 2.3.1.

		appropriate methods to avoid excessive soil disturbance.		2.3.2 in a new Indicator 2.3.1.	
Indicators 2.3.1 and 2.3.2 could be combined as the wording is repeated.	Streamlining suggestion.	Process including use of soil maps, where available, to identify soils vulnerable to compaction and use of appropriate methods to avoid excessive soil disturbance.	2	Task Groups concurs with comment and has combined existing Indicators 2.3.1 and 2.3.2 in a new Indicator 2.3.1.	Refer to Ind. 2.3.1.
If you keep this language for this indicator, do you need indicator #2?			2	Task Groups concurs with comment and has combined existing Indicators 2.3.1 and 2.3.2 in a new Indicator 2.3.1.	Refer to Ind. 2.3.1.
Consider combining with 2.3.2		Process to identify soils vulnerable to compaction, and use of appropriate methods, including soils maps, to avoid excessive soil disturbance.	2	Task Groups concurs with comment and has combined existing Indicators 2.3.1 and 2.3.2 in a new Indicator 2.3.1.	Refer to Ind. 2.3.1.
2.3.1 and 2.3.2 are virtually the same. Soil maps (if available) would be used as part of the process to identify soils that are vulnerable to compaction.		Combine the indicators and have it read like this: "A process to identify soils vulnerable to compaction, and use of appropriate methods to avoid excessive soil disturbance, which would include the use of soils maps where available."	2	Task Groups concurs with comment and has combined existing Indicators 2.3.1 and 2.3.2 in a new Indicator 2.3.1.	Refer to Ind. 2.3.1.
Addition of erosion will expand effort to protect forest soil productivity		1. Use of soils maps where available to identify soils vulnerable to compaction and erosion and use of appropriate methods to avoid excessive soil disturbance.	2	Task Groups believes that comment is addressed by revised Indicator 2.3.1.	Refer to Ind. 2.3.1.
Indicators 2.3.1 and 2.3.2 are essentially the same		Combine the two	2	Task Groups concurs with comment and has combined existing Indicators 2.3.1 and 2.3.2 in a new Indicator 2.3.1.	Refer to Ind. 2.3.1.
1. Changes made here, if they stay, seem to make indicator 2 duplicative. 1. Both indicators should stay with existing language.	Soil maps are used for other reasons besides compaction concerns. They are also used in productivity assessments and other management activities. They are a basic management planning tool that should be used whenever they are available. They should not be singled out as just being important for "compaction" concerns. This seems to weaken the requirements to me without adding any clarity as to what needs to be done in regards to compaction and soil disturbance.	Keep the existing indicators as they are in the current standard. No changes are necessary.	2	Task Group does not agree with the comment and has combined existing Indicators 2.3.1 and 2.3.2 in a new Indicator 2.3.1 believing that this removes redundancy while maintaining the requirement to address soil productivity.	Refer to Ind. 2.3.1.
Good clarification of the purpose/reason for referencing soil maps.	Good clarification of the purpose/reason for referencing soil maps.	NA	3	Comment is supportive of new Indicator 2.3.1.	Refer to Ind. 2.3.1.
PM 2.3.1 and 2.3.2 are basically the same.	Remove current 2.3.1 as use of the word "Process" provides participants with more options. "Use of soil maps" is too prescriptive.		2	Task Groups concurs with comment and has combined existing Indicators 2.3.1 and 2.3.2 in a new Indicator 2.3.1.	Refer to Ind. 2.3.1.
2. Process to identify soils vulnerable to compaction, and use of appropriate methods to avoid excessive soil disturbance.					
	2.3.2 – "excessive soil disturbance". Unclear what this means; what is the baseline.	Define the term.	3	Impossible to define excessive soil disturbance in the standard. Best defined at the regional/local level.	None
Isn't this now a bit redundant with indicator 1?			2	Task Groups concurs with comment and has combined existing Indicators 2.3.1 and 2.3.2 in a new Indicator 2.3.1.	Refer to Ind. 2.3.1.
Consider combining with 2.3.1			2	Task Groups concurs with comment and has combined existing Indicators 2.3.1 and 2.3.2 in a new Indicator 2.3.1.	Refer to Ind. 2.3.1.
2.3.1 and 2.3.2 are virtually the same. Soil maps (if available) would be used as part of the process to identify soils that are vulnerable to		Combine the indicators and have it read like this: "A process to identify soils vulnerable to compaction, and	2	Task Groups concurs with comment and has combined existing Indicators 2.3.1 and	Refer to Ind. 2.3.1.

compaction.		use of appropriate methods to avoid excessive soil disturbance, which would include the use of soils maps where available."		2.3.2 in a new Indicator 2.3.1.	
Addition of erosion will expand effort to protect forest soil productivity		2. Process to identify soils vulnerable to compaction and erosion and use of appropriate methods to avoid excessive soil disturbance.	2	Task Groups believes that comment is addressed by revised Indicator 2.3.1.	Refer to Ind. 2.3.1.
Indicators 2.3.1 and 2.3.2 are essentially the same		Combine the two	2	Task Groups concurs with comment and has combined existing Indicators 2.3.1 and 2.3.2 in a new Indicator 2.3.1.	Refer to Ind. 2.3.1.
4. Post-harvest conditions conducive to maintaining site *productivity* (e.g. limited rutting, retained down woody debris, *minimized skid trails*).					
5. Retention of vigorous trees during partial harvesting, consistent with scientific silvicultural standards for the area.					
6. Criteria that address harvesting and site preparation to protect soil *productivity*.					
7. Road construction and skidding layout to *minimize* impacts to soil *productivity*.					
Seems duplicative – both speak to considering road and skid trail layout to minimize impacts –seems duplicative with 3.2.1.	Remove		2	Task Group has reviewed the comment and disagrees with removing existing Indicator 2.1.7 though it has revised it to make the indicator specific to soil productivity.	Refer to Ind. 2.1.6.
Delete indicator 2.3.7	Duplicates 3.2.1	Delete indicator 2.3.7	2	Task Group has reviewed the comment and disagrees with removing existing Indicator 2.1.7 though it has revised it to make the indicator specific to soil productivity.	Refer to Ind. 2.1.6.
Appropriately moved "water quality" to Objective 3.	Appropriately moved "water quality" to Objective 3.	NA	2	Comment is supportive of making Indicator 2.1.6 specific to soil productivity.	Refer to Ind. 2.1.6.

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*.

PM 2.4 Indicators:

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language

Exotics - Prohibit, not 'minimize' the use of 'exotics' and Genetically Modified Organism' s (Performance Measure 2.4).			2	Task Group has reviewed the comments however it appears that the comment misunderstands the requirement regarding *invasive exotics plant*. The comment would appear to understand this requirement as prohibiting the deployment of exotics. PM 2.4 addresses measure to prevent the incursion of invasive exotic plants. The SFI Standard does not permit the operational deployment of GM materials in planting stock.	None
1. *Program* to protect forests from damaging agents.					
Name the "damaging agents" as you have indicated above, OR,	it is redundant,	Drop this statement	2	Task Group has reviewed the comment and disagrees with the suggestion that Indicator 2.4.1 be removed. Task Group believes that the Indicator continues to be an effective requirement.	None
2. Management to promote healthy and productive forest conditions to *minimize* susceptibility to damaging agents.					
3. Participation in, and support of, fire and pest prevention and control *programs*.					

Performance Measure 2.5. *Program Participants* that deploy *improved planting stock*, including *varietal seedlings*, shall use sound scientific methods.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
I am not sure how to interpret this statement	Therefore, I doubt that the average forest landowner knows what are "sound scientific methods"	Tell us exactly what you want us to do or not do!	2	Task Group believes that comment is addressed by revised Performance Measure 2.5.	Refer to PM 2.5.

PM 2.5 Indicator:

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
1. *Program* for appropriate research, testing, evaluation and deployment of *improved planting stock*, including *varietal seedlings*.					
The seedlings that you are referring, aren't they still in a testing period?	Not sure if this statement is feasible with present day research methods.	Tell us exactly what you want us to do or not do!	2	Task Group has reviewed the comment and believes that revised Indicator 2.5.1 and the SFI Forest Tree Biotechnology Policy address this comment.	Refer to Indicator 2.5.1 and SFI Forest Tree Biotechnology Policy.

Use this space to propose any removals or additions for Objective 2.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
2.1.1 could arguably be removed as the reforestation requirement is already alluded to in 2.1.2.					None
An indicator has been added prohibiting the use of World Health Organization Type 1A and 1B pesticides except where no other viable alternative is available. This list can be found at www.who.int/ipcs/publications/pesticides_hazard_rev_3.pdf I reviewed it but have no expertise to know for sure what they are….though my guess is that these are not a problem for US Forestry. We do not support. Regulations promulgated under the Federal Insecticide, Fungicide and Rodenticide Act are sufficient to manage the use of pesticides in the US.			2	Task Group believes that comment is addressed by Indicators 2.2.4 and 2.2.5. Link to WHO and Stockholm Convention websites listing the respective chemicals will be available to Program Participants via SFI website. However, Program Participant will need to ensure (via periodic monitoring of the lists) that they are in compliance with these lists.	Refer to Ind. 2.2.4 and 2.2.5.
2.1.1 could be removed as the reforestation requirement is already in 2.1.2.			2	Task Group has reviewed the comment and combined the former Indicators 2.1.1 and 2.1.2 to create new Indicator 2.1.1. Task Group believes that new Ind. 2.1.1 addresses the comment.	Refer to Indicator 2.1.1.

Objective 3. Protection and Maintenance of Water Resources. *To protect the water quality of rivers, streams, lakes, wetlands and other water bodies*

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
How does BMPs address unavoidable but de minimis instances? Currently there is no de minimis exceptions in some state and federal legislation			3	Task Group has reviewed the comment and believes it that trying to define a de minimis level of non-conformance with Best Management Practices would be problematic and counter-productive to the intent of the Objective.	None
SAF members view the expansion of the Protection and Maintenance of Water Quality Objective to include requirements for protection of wetlands and riparian areas as an improvement to the Standard. Requiring a program that meets or exceeds the best management practices or other established state and provincial guidelines will protect and enhance water quality, wetlands, and riparian areas. SAF suggests adding examples of "other applicable factors" such as compliance under Section 404(f) of the Clean Water Act to help further explain compliance requirements.			2	Task Group reviewed the comment. Regarding the comment to cite compliance under Section 404(t) of the US Clean Water Act as one of the requirements in Objective 3, adding this requirement would not recognize that the Clean Water Act does not apply in Canada where there are significant areas of SFI certified forests.	None
Where participants had been required to meet state or provincial BMP's they have added federal water quality BMP's.	Since there are no federal BMP's and since development of these are the responsibility of the states we do not support this change.		3	Task Group reviewed the comment and notes that there are examples of federal legislation that impacts water quality (e.g. CAMA (US); Federal Fisheries Act (CDN)).	None
Good addition of "wetlands."		NA	3	Comment is supportive of draft language.	None

Performance Measure 3.1. *Program Participant*s 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. Environmental Protection Agency–approved water quality *programs*.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
Without question one of the most significant objectives in the SFI Program			3	General Comment	None

PM 3.1 Indicators:

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
1. *Program* to implement federal, state or provincial water quality best management practices during all phases of management activities.					
Specifying "water quality BMPs" may be a bit redundant, given that the way BMPs is currently used in the SFI standard only applies to water-	Specifying "water quality BMPs" may be a bit redundant, given that the way BMPs is currently	NA	2	Task Group believes comment is addressed with revised Indicator 3.1.1.	Refer to Indicator 3.1.1.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
related issues. I believe it is OK to leave as is ... for clarity. If Objective 2 is expanded to include soil-related BMPs, then it is important to keep the reference to water quality here.	used in the SFI standard only applies to water-related issues. I believe it is OK to leave as is ... for clarity. If Objective 2 is expanded to include soil-related BMPs, then it is important to keep the reference to water quality here.				
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. *Proposed changes to the Standard would also eliminate the requirement to use experts to identify appropriate protection measures where BMPs do not exist (though there are probably few states in which no BMPs exist whatsoever).* Relevant SFI provisions (2010-2014): Objective 3 Protection and Maintenance of Water Resources, including Indicators 3.2.1 and 3.2.5; Performance Measure 2.3. *Proposed new language: Performance Measure 3.2.*	None provided. No specific change proposed.	None provided. No specific change proposed.	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 addition 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. The Task Group disagrees with the comment regarding no longer requiring the use of experts to identify protection measures where BMPs do not exist. All US States and Canadian Provinces have BMPs for water quality protection.	Refer to Indicator 2.3.1.
3.1.1. – "best management practices (BMPs)". The examples are confusing; people often ask for them to be explained.	Remove the examples.		3	Comment makes reference to examples in Indicator 3.1.1 however there are no examples in the Indicator.	None
2. Contract provisions that specify conformance to *best management practices*.					
3. Plans that address wet-weather events in order to maintain water quality (e.g. *forest inventory* systems, wet-weather tracts, definitions of acceptable operating conditions).					
Improve examples in indicator.	It is unclear how "forest inventory systems" are examples of "plans that address wet weather events". Improve examples.	3. Plans that address wet-weather events in order to maintain water quality (e.g. wet-weather shutdown requirements, identification of wet-weather tracts, definitions of acceptable operating conditions).	2	This existing indicator was removed as per Task Group discussions at April 2014 meeting. Indicator was believed to have become unnecessary. Intent of this	None

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
				indicator is addressed via the remaining Indicators in Performance Measure 3.1.	
Move to PM 3.2 indicators	Wet weather events are not covered under BMPs	Delete from PM 3.1	2	This existing indicator was removed as per Task Group discussions at April 2014 meeting. Indicator was believed to have become unnecessary. Intent of this indicator is addressed via the remaining Indicators in Performance Measure 3.1.	None
"Wet-weather" events are not typically covered in BMPs. Move to PM 3.2. Nor are there always laws that relate to "wet-weather events." Better fit in 3.2.	"Wet-weather" events are not typically covered in BMPs. Move to PM 3.2. Nor are there always laws that relate to "wet-weather events." Better fit in 3.2.	Move to under PM 3.2.	2	This existing indicator was moved as per Task Group discussions at April 2014 meeting to Performance Measure 3.2. Indicator where it was believed to be a better fit.	Refer PM 3.2.
Clarification is needed as to the intent of this indicator, including examples for operations in northern climates.	Not clear if this is intended to be plans for flood events, or seasonal conditions (e.g., frozen vs. non-frozen), or ?? Depending on intent, this may belong more appropriately under PM 3.2.		2	Task Group concurs with comment. This existing indicator was moved as per Task Group discussions at April 2014 meeting to Performance Measure 3.2. Indicator where it was believed to be a better fit.	Refer PM 3.2.
4. Monitoring of overall *best management practices* implementation					

Performance Measure 3.2. *Certified Program Participant*s shall develop and implement water, *wetland* and *riparian area* protection measures based on soil type, terrain, vegetation, ecological function, harvesting system, state BMPs, provincial guidelines and other applicable factors.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
PM 3.2 What is the difference between a state BMP and a provincial guideline? Why imply that there is a different standard? This is the only PM that refers to a guideline. Proposes changing the statement to read BMPs, guidelines and	It's time to remove specific reference to State and Provincial. This is a NA standard.	after harvesting system....include statement..."referencing BMPs and other applicable factors.	2	Task Group reviewed comment. Comment proposes removal of references to “state” and "provincial". The Task Group disagree with this revision given that BMPs have a specific legal definition in US, and provincial guidelines are meant to address Canadian equivalent water quality guidelines.	None
Forestland wetlands vs. other wetlands. Make a clear distinction. Define it.			2	Task Group believes that revised definitions for wet-land and non-forested wetland makes the distinction clear.	None
The word “develop” is redundant; if “implemented” it is a given that measures would be developed. Take “develop” out.			2	Task Group concurs with the comment and has revised the Performance Measure 3.2.	Refer to PM 3.2.

Some areas are comprised of a majority of jurisdictional wetland. "Protection" is vague. Difficult to protect and harvest. The public would not understand/consider active management "protection"	Add to "other applicable factors" mention of Clean Water Act 404 exemptions, OR add "in compliance with state BMPs and Federal law"		2	Regarding the comment to cite compliance under Section 404(t) of the US Clean Water Act as one of the requirements in Objective 3, adding this requirement would not recognize that the Clean Water Act does not apply in Canada where there are significant areas of SFI certified forests. Regarding the use of the term *protection* – this s a defined term in SFI Section 13 – Definitions.	Refer to PM 3.2 and definition of *protection* in SFI Section 13.
Remove the word 'develop' after shall.	Some areas have regulatory framework(s) in place where riparian protection measures have been pre-developed only requiring a landowner to 'implement'; allowing for use of regulatory frameworks to 'develop'.	Certified Program Participants shall implement water, wetland and riparian area protection measures based on soil type, terrain, vegetation, ecological function, harvesting system, state BMPs, provincial guidelines and other applicable factors.	2	Task Group concurs with the comment and has revised the Performance Measure 3.2.	Refer to PM 3.2.
Move current indicator 3.1.3 here.	Better fit. See previous comments.	Use current language.	2	The existing indicator 3.1.3 was removed as per Task Group discussions at April 2014 meeting. Indicator was believed to have become unnecessary. Intent of this indicator is addressed via the remaining Indicators in Performance Measure 3.1.	None
Can this be combined with PM # 3.1.			2	Task Group reviewed comment but has decided to keep Performance Measures 3.1 and 3.2 separate.	Refer to PM 3.1 and PM 3.2.
The addition of wetlands to this PM could be challenging to implement in practice. Though the term is defined in the standard, in practice identifying a "wetland" on the ground will be open to interpretation. In the Coastal Plain much of the land is classed as poorly drained or very poorly drained. Under current regulations it is entirely legal and appropriate to bed and plant some of these areas. The proposed PM may require participants to do as little as the addition of some words in a policy, or it may require them to delineate and protect all wetlands on their property. The concern is that PM3.2.3 leaves participants open to challenges by opponents of the industry regarding whether "wetlands", as defined by SFI, are being protected on private land.	It seems like a carry-over thought from PM #3	Add specifics of PM #3.2 to PM # 3.1, then drop PM # 3.2.	2	Task Group reviewed comment but has decided to keep Performance Measures 3.1.and 3.2 separate.	Refer to PM 3.1 and PM 3.2.

PM 3.2 Indicators:

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
1. *Program* addressing management and protection of rivers, streams, lakes, wetlands, other water bodies and riparian areas during all phases of management, including the layout and construction of roads and skid trails to maintain water movement and water quality.					

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
There is no mention of size or frequency of wetlands and this may result in areas being "hands off" that were not intended to be.	Revise language to ensure "protection" is focused on water quality through management		3	The term *protection* is a defined term in SFI *Section* 13: *maintenance of the status or integrity, over the long term, of identified attributes or values including management where appropriate and giving consideration to historical disturbance patterns, fire risk and forest health when determining appropriate conservation strategies.*	Refer to SFI Section 13.
What if the new regulations from the province of Quebec on wetlands definitions are different from the Standard?	If Quebec definition is stronger, it is law and must be followed. If SFI is stronger, it becomes a benchmark.		3	If legal requirements for water quality were to change (strengthen) then the legal base-line for these requirements changes accordingly.	None
Delete this indicator	This indicator simply regurgitates the language in PM 3.2 and provides little value as an indicator OR for consistency, mirror the language change in PM 4.1	"Protect rivers, streams, wetlands, ..."	2	Task Group believes that the revised Indicator 3.2.1 continues to be effective.	Refer to Indicator 3.2.1.
We support the change in 3.2.1 to add a reference to stream flow, i.e., water quantity or hydrology. This will be helpful in showing how the SFI standard addresses Clean Water Act requirements in the U.S., especially wetland protection. Normal, ongoing forestry operations (and farming) are exempt from the requirement for a wetland permit under section 404 of the Clean Water Act. That exemption, however, is limited to activities that do not "reduce the reach, or impair the flow or circulation of" water bodies, including wetlands – i.e., change the hydrology. This is called the "recapture provision," and the change to the SFI standard clarifies that program participants will avoid it by protecting hydrology. See http://water.epa.gov/lawsregs/guidance/wetlands/cwaag.cfm	The new language would be more helpful as an educational tool if it were closer in wording to the recapture provision.	1. Program addressing management and protection of rivers, streams, lakes, wetlands, other water bodies, and riparian areas during all phases of management, including the layout and construction of roads and skid trails, to maintain water quality and the reach and flow or circulation of waters.	2	Task Group has reviewed comment and concurs with the suggestion and has revised Indicator 3.2.1 to incorporate maintenance of "water reach, flow and quality".	Refer to Ind. 3.2.1.
The indicator should be worded similar to 3.1.1, perhaps with addition of forest planning and not include singular example dealing with roads and skid trails	...during all phases of forest planning and management is sufficient	Program addressing management and protection of rivers, streams, lakes, wetlands, other water bodies and riparian areas during all phases of forest planning and management	2	Task Group has reviewed the comment but believes the inclusion of the reference to "lay-out and construction of roads", etc. strengthens the requirement.	Refer to Ind. 3.2.1.
Delete this indicator	This indicator simply restates the language in PM 3.2 and provides little value as an indicator	Delete this indicator OR for consistency, mirror the language change in PM 4.1	2	Task Group disagrees with the comment and believes that the revised Indicator 3.2.1 continues to be an effective requirement.	Refer to Ind. 3.2.1.
What does "maintain water movement" mean? What is the intent? Sounds like you are trying to keep water moving as in flowing?		May need some clarifying language or change to existing. I can't propose new language because I don't understand the intent behind the change.	2	Task Group believes that revised Indicator 3.2.1 addresses the comment.	Refer to Ind. 3.2.1.
Good change to expand to include "wetlands" and "riparian areas."	Good change to expand to include "wetlands" and "riparian areas."	NA	3	Comment is supportive of draft language for Indicator 3.2.1.	
All of this sounds repetitive of PM # 3.1 indicators	Redundant restatement of PM # 3.1 indicators	Consider adding critical aspects of these PM indicators to PM # 3.1 indicators and drop PM # 3.2 indicators.	2	Task Group reviewed comment but has decided to keep the requirements for Performance Measures 3.1. and 3.2 separate.	Refer to PM 3.1 and PM 3.2.
2. Mapping of rivers, streams, lakes, wetlands and other water bodies as specified in state or provincial *best management practices* and, where appropriate, identification on the ground.					

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
Same concerns as 3.2. Redundant – "mapping" and "identification" is necessary to "document and implement plans"			2	Task Group believes that revised Indicator 3.2.2 continues to be an effective requirement.	Refer to Ind. 3.2.2.
All of this sounds repetitive of PM # 3.1 indicators	Redundant restatement of PM # 3.1 indicators	Consider adding critical aspects of these PM indicators to PM # 3.1 indicators and drop PM # 3.2 indicators.	2	Task Group reviewed comment but has decided to keep the requirements for Performance Measures 3.1. and 3.2 separate.	Refer to PM 3.1 and PM 3.2.
3. Document and implement plans to manage and protect rivers, streams, lakes, *wetlands*, other water bodies and *riparian areas*.					
What is meant by manage? Participants are forest managers and their impacts; not water, river, lakes stream managers			2	Task Group has reviewed the comment but believes that the revised Indicator 3.2.3 continues to be an effective.	Refer to Ind. 3.2.3.
Shouldn't it be sufficient to be in legal compliance with protection laws? Is the intent to say be in legal compliance with regard to management and protection of river, steam wetlands, etc., or is the intent to go beyond laws?	Add "where environmental laws are not in place, document and ….."		2	Task Group has reviewed the comment but believes that a specific requirement to document plans for ensuring legal compliance and the implementation of these plans is an important requirement regardless of the presence or absence of water quality regulation.	Refer to Ind. 3.2.3.
In various places wetlands have been added as a specific water body requiring protection.		This is consistent with federal law and should be supported. Change Indicator 3.2.3 to read, "Document and implement plans to protect rivers, streams, lakes, wetlands, other water bodies and riparian areas while carrying out appropriate management of the forests associated with those water resources".	2	Task Group has reviewed the comment but believes that the proposed language for Indicator 3.2.3 is sufficient to meet the intent of the comment.	Refer to Ind. 3.2.3.
Please add "as specified in state or provincial best management practices" at end of indicator number 3.	By referencing state or provincial BMPs, the indicator is tied to a more objective definition of the protected resource, enabling the SFI member to document fulfillment of the performance measure and avoid debates about ambiguous areas of small forested wetlands or riparian areas that are not intended to be protected resources.	Please add "as specified in state or provincial best management practices" at end of indicator number 3.	2	Task Group has reviewed the comment but believes that the proposed language for Performance Measure 3.2 with its reference to "state BMPs and provincial guidelines" addresses the intent of the comment.	Refer to PM 3.2 and Ind. 3.2.3.
All of this sounds repetitive of PM # 3.1 indicators	Redundant restatement of PM # 3.1 indicators	Consider adding critical aspects of these PM indicators to PM # 3.1 indicators and drop PM # 3.2 indicators.	2	Task Group reviewed comment but has decided to keep the requirements for Performance Measures 3.1. and 3.2 separate.	Refer to PM 3.1 and PM 3.2.

Use this space to propose any removals or additions for Objective 3:

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language

Forest wetlands should be explicitly excluded from the "protection" aspect unless protection allows harvesting but maintains site integrity. Forest wetlands can be a significant source of wood products upon which forest companies rely.			2	Comment addressed with the definition of *protection* is a defined term in SFI *Section* 13: *maintenance of the status or integrity, over the long term, of identified attributes or values including management where appropriate and giving consideration to historical disturbance patterns, fire risk and forest health when determining appropriate conservation strategies.*	Refer to SFI Section 13.
3.2.1 simply regurgitates the PM 3.2 and has little value as an indicator. SFI should strive to keep the language consistent from one Objective to the next and reduce redundancy.			2	Task Group reviewed comment but has decided to keep separate the requirements for Performance Measures 3.1.and 3.2.	Refer to PM 3.1 and PM 3.2.
This indicator simply restates the language in PM 3.2 and provides little value as an indicator. Delete this indicator OR for consistency, mirror the language change in PM 4.1			3	Not evident from comment with Indicator is being referred to.	None
Change Principle to reflect the addition of the new "riparian area" term. Good decision to move the previous (current0 3.2.4 to Objective 4. Also good idea to merge the previous (current) 3.2.5 with other existing indicators.			3	Comment is supportive of draft language for PM 3.2.	None

Objective 4. Conservation of Biological Diversity

Objective 4. *Conservation* of *Biological Diversity*. To manage the quality and distribution of *wildlife habitat*s 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*.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
This has been separated from requirements related to Forests with Exceptional Conservation Value. General requirements for biodiversity remain the same except that forest management plans should now consider the role of natural disturbance in conserving biological diversity.	We are not supportive unless there can be more clarity around what is expected when you "consider the role of natural disturbance" and how that expectation might impact the achievement of management objectives.		3	Comment is addressed elsewhere in the Objective 4 comments.	None

	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. *Proposed new language in the context of fiber sourcing from North America would do little to change this situation, as it is even more vague than existing language, and contains no actual forest management or biodiversity objectives or required outcomes. Moreover, as noted below, other proposed changes to the Standard would make it easier to use exotic species, which by definition is antithetical to natural biodiversity conservation.* Relevant SFI provisions (2010-2014): Indicators 4.1.1, 4.1.4, and 4.1.5. *Proposed new language: Performance Measure 9.1*	None provided. No specific change proposed.	None provided. No specific change proposed.	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. Moreover, the Task Group disagrees with the comment regarding new Objective 9 and believes this is a significant step forward for the SFI fiber sourcing requirements, which no other forest standard in the world has.	Refer to Performance Measures 4.1, 4.3 and 4.3. and Objective 9.

	Objective 4, contains weaknesses in the wording on conservation of biodiversity, and subsequent indicators do not define what a "program to promote" or "program to protect' is, or what the "program to protect" requires. Furthermore, the standard does not require setting aside biodiversity hotspots or endangered forests for protection, except where areas are already protected by law. Suggested Improvements: 1. Protection of Forests with Exceptional Conservation Value needs to include primary, intact, endangered and natural forests as well as old growth based on definitions in the Wye Group report.1 2. Carbon storage values of Forests with Exceptional Conservation Value also need to be protected. 3. Programs to protect these values should not be done independently, as programs with social and environmental stakeholder input will be much stronger, and should have clear measurable objectives to set aside Forests of Exception Conservation Value from logging. 4. No fiber from Forests of Exceptional Conservation Value should go to bioenergy feedstock. 5. Prohibit (not limit) the use or introduction of exotic and invasive species in the Forests with Exceptional Conservation Value. 6. Use a broad range of databases for scanning endangered, high conservation and Forests with Exceptional Conservation Value. Options include ProForest http://www.proforest.net/objects/publications/ and WWF's tools for forest protection at http:1/www.panda.org/what_we_do/how_we_work/conservation/forests/aur_solutions/protection/ tools/. 7. Require protection for biodiversity hotspots and other endangered forest areas. The SFI 2015-2019 standard needs to include defined timelines for mapping and cataloging and protection of Forests with Exceptional Conservation Value and threatened and endangered species to take place. Without this, forest managers can do business as usual and no meaningful change will result. Until these things are mapped and set asides are put in place, a precautionary principle needs to be used.			2	The Task Group has reviewed the comments and has the following response: Program to Protect - *Program* and *Protection* are defined terms (SFI Section 13). 1. FECV do include amongst other forest cover types those types that contain G1 and G2 species as well as forests identified by regulation for protection or by the Program Participants (PP). 2. Carbon Values are addressed in PM 2,1, PM 2.3, PM 4.1, 4.2, PM 4.3 and PM 4.4. 3. PM 4.2 states that Program Participants can manage for FECV individually or collaboratively in recognition that the values contained within FECV can often extend the bounds of a PP ownership or management responsibilities. 4. As conservation allows for the management of FECVs, the Task Group does not believe it makes sense to ban the use of fiber from these FECV. 5. The comment misunderstands the SFI requirement – the standard requires that *invasive exotic plants* by removed wherever possible and that they are not to be used. 6. The SFI Standard does reference several databases that record forest cover types that that include FECV and old growth the most widely used is NatureServe. 7. This item is addressed with the requirements of Objective 4 and Objective 9 of the SFI Forest Management Standard. The final comment incorrectly implies that the Standard in Objective 1, 4 and 6 does not require location (mapping) of FECV and/or T&E spp.	Refer to PM 4.1, PM 4.2, PM 4.3 and PM 4.4.

Current SFI language referencing programs to conserve biodiversity is not specific enough to address this issue. In addition, 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 recognized 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." SFI continues to point to Forests of Exceptional Conservation Value (FECV) as their analogue to High Conservation Value Forests. However, the FECV definition is limited to critically imperiled and imperiled species and communities. As such, FECV is currently a stand-level conservation concept and does not address landscape-level biodiversity issues.	Recommend adopting clear, auditable landscape-level biodiversity indicators that meet PEFC requirements and move toward the biodiversity-related elements of the High Conservation Value (HCV) approach. Expand definitions of Forests of Exceptional Conservation Value (FECV) to include all globally vulnerable species and communities		2	Task Group has reviewed the comment has the following responses. Regarding the assertion that SFI Objective 4 requirements not meeting the requirements of PEFC ST 1003:2010, this is not correct. SFI forest management requirements, including those for FECV, were reviewed against the requirements of PEFC ST 1003:2010 in 2011 and then again in 2013 and found to be conformant.	Refer to PM 4.1, PM 4.2, PM 4.3 and PM 4.4.
Good change to drop specific reference to FECVs. The Objective is much broader than just FECVs.	Good change to drop specific reference to FECVs. The Objective is much broader than just FECVs.	NA	3	Comment is supportive of draft Objective 4 language.	None
Not understandable from a laymen's point of view	Too many words with vague and"diverse" definitions and opinoins.	Rewrite to tell us what specifically is to be done here, OR Scrap!	3	Task Group believes comment is addressed with revised language for Performance Measures 4.1; 4.2, 4.3 and 4.4 and the corresponding guidance in SFI Section 6 – Guidance.	Refer to PM 4.1, PM 4.2, PM 4.3 and PM 4.4 and SFI Section 6 – Guidance.
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 (2010-2014): Objective 4 Conservation of Biological Diversity, Objective 6 Protection of Special Sites, and Indicator 11.1.1.	None provided. No specific change proposed.	None provided. No specific change proposed.	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 draft language addressing avoidance of illegally harvested wood and a Due Diligence System for avoidance of fiber from controversial sources	Refer to Objective 9 and Performance Measure 9.1, and Performance Measure 15.1 and Indicators 15.1.4 and 15.1. Also refer to revised Illegal Logging definition (SFI Section 13) and guidance (SFI Section 6) and Due Diligence System (SFI Section 4).

Performance Measure 4.1. *Program Participants* shall conserve *biological diversity*.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
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 (2010-2014): SFI Standard, Indicators 4.1.2 and 4.1.3; Guidance to SFI 2010-2014 Standard.**	None provided. No specific change proposed.	None provided. No specific change proposed.	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.	Refer to PM 4.1, PM 4.2, PM 4.3 and PM 4.4 and SFI Section 6 – Guidance.
Not understandable from a laymen's point of view	"Biological diversity" is a vague and"diverse" term lacking definitive definitions and subject to various opinoins.	Rewrite to tell us what specifically is to be done here, OR Scrap!	3	Task Group believes comment is addressed with revised language for Performance Measures 4.1; 4.2, 4.3 and 4.4 and the corresponding guidance in SFI Section 6 – Guidance.	Refer to PM 4.1, PM 4.2, PM 4.3 and PM 4.4 and SFI Section 6 – Guidance.
shall conserve should not be used	Conserving existing biodiversity implies that today's state is desired. The objective many be to improve biodiversity through forest management	promote biodiversity	2	Task Group has reviewed the comment but believes that the proposed language for PM 4.1 enhances the Performance Measure.	Refer to PM 4.1.

	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 (2010-2014): SFI Standard, Indicators 4.1.2 and 4.1.3; Guidance to SFI 2010-2014 Standard.**	None provided. No specific change proposed.	None provided. No specific change proposed.	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.	Refer to PM 4.1, PM 4.2, PM 4.3 and PM 4.4 and SFI Section 6 – Guidance.

PM 4.1 Indicators:

	Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
1. *Program* to incorporate the *conservation* of native *biological diversity*, including species, wildlife habitats and ecological community types at *stand* and *landscape* levels.						
	Change to "incorporate" is good change.	Change to "incorporate" is good change.		3	Comment is supportive of change.	None
	How this is currently written it reads that this would conserve entire suite of biodiversity. Add "consistent with management goals".			2	Task Group has reviewed the comment but believes that the proposed language for Indicator 4.1.1 ensures that the indicator continues to be an effective requirement.	Refer to Ind. 4.1.1.
	Auditable indicators are needed, not just programs.	Recommend adopting clear, auditable landscape-level biodiversity indicators that meet PEFC requirements and move toward the biodiversity-related elements of the High Conservation Value (HCV) approach. Expand definitions of Forests of Exceptional Conservation Value (FECV) to include all globally vulnerable species and communities.		2	Task Group has reviewed the comment has the following responses. SFI requirements are auditable. Achieving management objectives is best done with comprehensive programs which are in turn built on rigorous indicators. A desired objective or outcome without an effective	Refer to PM 4.1, PM 4.2, PM 4.3 and PM 4.4.

				program will not be achieved. Regarding the assertion that SFI Objective 4 requirements not meeting the requirements of PEFC ST 1003:2010, this is not correct. SFI forest management requirements, including those for FECV, were reviewed against the requirements of PEFC ST 1003:2010 in 2011 and again in 2013 and found to be conformant.	
Good clarification of "stand and landscape level" scope.	Clarifies.	NA	3	Comment is supportive of the draft language for Indicator 4.1.1.	None
The biodiversity indicators, such as 4.1.1, are dominated by language that is not auditable and do not include protection of globally vulnerable species and communities.		Clear, auditable landscape-level biodiversity indicators that meet PEFC requirements should be adopted, moving toward the biodiversity-related elements of the HCV approach.	2	Task Group has reviewed the comment has the following responses. SFI requirements are auditable. Achieving management objectives is best done with comprehensive programs which are in turn built on rigorous indicators. A desired objective or outcome without an effective program will not be achieved. Regarding the assertion that SFI Objective 4 requirements not meeting the requirements of PEFC ST 1003:2010, this is not correct. SFI forest management requirements, including those for FECV, were reviewed against the requirements of PEFC ST 1003:2010 in 2011 and again in 2013 and found to be conformant.	None
Insert "in management activities" before "at the stand and landscape levels."			2	Task Group has reviewed the comment but believes that the draft language for Indicator 4.1.1 ensures that the indicator continues to be an effective requirement.	Refer to Ind. 4.1.1.
Does "conservation of native biological diversity" mean that we should be managing for natural regeneration?	The low information opinion from the public may construe this as the meaning	Scrap the term "native"; scraping the term "biological diversity" wouldn't hurt either.	2	Task Group has reviewed the comment but believes that the draft language for Indicator 4.1.1 ensures that the indicator continues to be an effective requirement.	Refer to Ind. 4.1.1.
2. Development of criteria and implementation of practices, as guided by regionally-based best scientific information, to retain stand-level wildlife habitat elements such as snags, stumps, mast trees, down woody debris, den trees and nest trees.					
Down wood is wildlife habitat - is not debris. Clarify or delete.			2	Task Group has reviewed the comment but believes that the term woody *debris* is widely recognized and is not meant to be a pejorative term. The Task Group believes the draft language for Indicator 4.1.2 ensures that the indicator continues to be an effective requirement.	Refer to Ind. 4.1.2.
The SFI does not require companies to restore portions of existing	None provided. No specific change proposed.	None provided. No specific change proposed.	2	Task Group has enhanced language for	See draft Performance Measures 1.2, 1.3

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 (2010-2014): Indicators 4.1.1, 4.1.4, and 4.1.5.				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 and has several requirements for biodiversity conservation which applies to all forest types-natural or planted.	and 3.2.
"regionally based best scientific information" - What does region mean? Regions differ in the information and quality of the information they have	Add specifics and/or add examples… OR broaden		2	Task Group has reviewed the comment but believes that the draft language for Indicator 4.1.2 ensures that the indicator continues to be an effective requirement.	Refer to Ind. 4.1.2.
Sometimes leaving snags is not safe	Add language that subordinates this to safety standards		2	Task Group has reviewed the comment and is of the opinion that nothing in the Indicator subordinates safety to the implementation of the indicator.	Refer to Ind. 4.1.2.
add in legal safety requirements	Depending on equipment used, some jurisdictions consider standing standing dead trees as safety hazards.	Development of criteria and implementation of practices, as guided by regionally-based best scientific information and safety regulations, to retain stand-level wildlife habitat elements such as snags, stumps, mast trees, down woody debris, den trees and nest trees.	2	Task Group has reviewed the comment and is of the opinion that nothing in the Indicator subordinates safety to the implementation of the indicator.	Refer to Ind. 4.1.2.
Auditable indicators are needed, not just programs.	Recommend adopting clear, auditable landscape-level biodiversity indicators that meet PEFC requirements and move toward the biodiversity-related elements of the High Conservation Value (HCV) approach. Expand definitions of Forests of Exceptional Conservation Value (FECV) to include all globally vulnerable species and communities.		2	Task Group has reviewed the comment has the following responses. SFI requirements are auditable. Achieving management objectives is best done with comprehensive programs which are in turn built on rigorous indicators. A desired objective or outcome without an effective program will not be achieved. Regarding the assertion that SFI Objective 4 requirements not meeting the requirements of PEFC ST 1003:2010, this is not correct. SFI forest management requirements, including those for FECV, were reviewed against the requirements of PEFC ST 1003:2010 in 2011 and again in 2013 and found to be conformant.	Refer to PM 4.1, PM 4.2, PM 4.3 and PM 4.4.
Good rewording. Reduces confusion.	Good rewording. Reduces confusion.	NA	3	Comment is supportive of the draft language for Indicator 4.1.2.	Refer to Ind. 4.1.2.
3. Take into account spatial and temporal assessments of forest cover types, age or size classes at the individual ownership level, and where credible data are available and relevant to the forest management planning level, at the landscape scale.					

What's the intention of this indicator?			2	Task Group is of the opinion that intent of the indicator is evident from the revised Indicator. Note that this indicator has been substantially revised as per discussion from the April Task Group meeting.	Refer to Ind. 4.1.3.
Define spatial and temporal assessment…OR define the assessment framework			2	Task Group believes that the revised language for Indicator 4.1.3 addresses the comment. Note that the requirement for a "spatial and temporal assessment" has been removed from the indicator.	Refer to Ind. 4.1.3.
4.1.3 – "spatial and temporal assessments". Unclear terms; unclear how this indicator will be met.	Add more specificity on "spatial and temporal assessments" – what are they? AND, change "and where" to "or where credible data are available". AND clarify intent.		2	Task Group believes that the revised language for Indicator 4.1.3 addresses the comment. Note that the requirement for a "spatial and temporal assessment" has been removed from the indicator.	Refer to Ind. 4.1.3.
Confusing; difficult to audit	Split into two indicators		2	Task Group believes that the revised language for Indicator 4.1.3 addresses the comment. Note that the requirement for a "spatial and temporal assessment" has been removed from the indicator.	Refer to Ind. 4.1.3.
"temporal" - Vague. Define in guidance			2	Task Group believes that the revised language for Indicator 4.1.3 addresses the comment. Note that the requirement for a "spatial and temporal assessment" has been removed from the indicator.	Refer to Ind. 4.1.3.
Confusing - Rework grammar			2	Task Group believes that the revised language for Indicator 4.1.3 addresses the comment.	Refer to Ind. 4.1.3.
Grammatically the indicator does not make sense.	Revised language will increase understanding	At the landscape level where credible and relevant data are available, take into account assessments of forest cover types, age or size classes during forest management planning.	2	Task Group believes that the revised language for Indicator 4.1.3 addresses the comment. Note that the requirement for a "spatial and temporal assessment" has been removed from the indicator.	Refer to Ind. 4.1.3.
Change indicator wording	Unclear what "temporal" assessments of forest cover types, age or size classes at the individual ownership level are.	Program for assessment, conducted either individually or collaboratively, of forest cover types, age and/or size classes at the individual ownership level and, where credible data are available, across the landscape, and take into account findings in planning and management activities.	2	Task Group believes that the revised language for Indicator 4.1.3 addresses the comment. Note that the requirement for a "spatial and temporal assessment" has been removed from the indicator.	Refer to Ind. 4.1.3.
Leave landscape analysis to government agencies.	Don't place the extra burden on the landowner.	Take into account spatial and temporal assessments of forest cover types, age or size classes at the individual ownership level.	2	Task Group believes that the revised language for Indicator 4.1.3 addresses the comment. Note that the requirement for a "spatial and temporal assessment" has been removed from the indicator.	Refer to Ind. 4.1.3.
Ownership level and landscape level may be very different depending on the participants' unique situation. Ownership may be a number of dispersed and very separate parcels with a variety of ownerships and management practices outside the control of a participant in between the owned parcels. Managing at the ownership AND landscape level in this situation would be impossible.	Landscape scale management may be outside the control of the participant	...at the ownership level, OR where credible data are available and relevant ...	2	Task Group believes that the revised language for Indicator 4.1.3 addresses the comment.	Refer to Ind. 4.1.3.

Lack of clarity.	Needs rewording to increase understanding of indicator	"Using credible data, assess forest cover types, ages, size classes, and habitats at the ownership level within the context of the larger landscape. Incorporate findings into planning and management activities."	2	Task Group believes that the revised language for Indicator 4.1.3 addresses the comment. Note that the requirement for a "spatial and temporal assessment" has been removed from the indicator.	Refer to Ind. 4.1.3.
This needs rewording to improve intent and expectations		Use of spatial and temporal assessments of forest cover types, age or size classes, at the individual ownership and landscape level (where credible data are available and relevant to forest management planning) to conserve biological diversity.	2	Task Group believes that the revised language for Indicator 4.1.3 addresses the comment. Note that the requirement for a "spatial and temporal assessment" has been removed from the indicator.	Refer to Ind. 4.1.3.
Unclear what is expected.	Reword for clarity.	"Using credible data, assess forest cover types, ages, size classes, and habitats at the ownership level within the context of the larger landscape when possible. Incorporate findings into planning and management activities."	2	Task Group believes that the revised language for Indicator 4.1.3 addresses the comment. Note that the requirement for a "spatial and temporal assessment" has been removed from the indicator.	Refer to Ind. 4.1.3.
not enough detail or clarity on what this actually requires	not enough detail or clarity on what this actually requires	4.1.3 Take into account spatial and temporal assessments of forest cover types, age or size classes at the individual ownership level and where credible data are available and relevant to the forest management planning level, at the landscape scale. Retain or restore all of the naturally occurring forest cover types, and age or size classes within those forest cover types at the individual ownership level.	2	Task Group believes that the revised language for Indicator 4.1.3 addresses the comment. Note that the requirement for a "spatial and temporal assessment" has been removed from the indicator.	Refer to Ind. 4.1.3.
Poor wording and un-auditable	Clarify wording to improve auditability.	Using credible data, assess forest cover types, ages, size classes, and habitats at the ownership level within the context of the larger landscape. Incorporate findings into planning and management activities.	2	Task Group believes that the revised language for Indicator 4.1.3 addresses the comment. Note that the requirement for a "spatial and temporal assessment" has been removed from the indicator.	Refer to Ind. 4.1.3.
Appropriate to expand portions of this indicator to all ownership sizes vs. just large holdings. However, this language is as confusing as the previous (current) language. Need to re-work and fix. it is still a disaster and very difficult to understand or audit to.	This language is as confusing as the previous (current) language. Need to re-work and fix. it is still a disaster and very difficult to understand or audit to. Intent is unclear.	Using credible data, assess forest cover types, ages, size classes, and habitats across the individual ownership level, projected over space and time, and incorporate findings into planning and management activities."	2	Task Group believes that the revised language for Indicator 4.1.3 addresses the comment.	Refer to Ind. 4.1.3.
Clear, auditable landscape-level biodiversity indicators that meet PEFC requirements should be adopted, moving toward the biodiversity-related elements of the HCV approach.		Take into account spatial and temporal assessments of forest cover types, age or size classes at the individual ownership level and where credible data are available and relevant to the forest management planning level, at the landscape scale. Retain or restore all of the naturally occurring forest cover types, and age or size classes within those forest cover types at the individual ownership level.	2	Task Group believes that the revised language for Indicator 4.1.3 addresses the comment. Note that the requirement for a "spatial and temporal assessment" has been removed from the indicator.	Refer to Ind. 4.1.3.
This language could be improved to be more clear as to expectations.	"Take into account" is different that saying program participates "will conduct" an assessment of cover types, etc., and incorporate into planning . . . . unless the intent is to consider this type of information only WHEN it is available.		2	Task Group believes that the revised language for Indicator 4.1.3 addresses the comment. Note that the requirement for a "spatial and temporal assessment" has been removed from the indicator.	Refer to Ind. 4.1.3.
We have NO idea what this means: "Take into account spatial and temporal assessments"	Need an interpreter for that statement; chances are who you ask, you are liable to get a myriad of opinoins.	Scrap the statement: "Take into account spatial and temporal assessments"	2	Task Group believes that the revised language for Indicator 4.1.3 addresses the comment. Note that the requirement for a "spatial and temporal assessment" has been removed from the indicator.	Refer to Ind. 4.1.3.

4. *Certified Program* Participants are knowledgeable about credible state, provincial, or regional conservation planning and priority-setting efforts that include Indigenous peoples to conserve biological diversity and consideration of these efforts in

forest management planning. Examples of credible priority-setting efforts could be state wildlife action plans, state forest action plans, relevant habitat conservation plans or provincial wildlife recovery plans.

This indicator is rather vague and does not necessarily result is the stated Performance Measure - "conserve biological diversity".	This indicator is not directly measurable and subjective.	Drop this indicator - not needed.	2	Task Group has reviewed comment but believes that he draft Indicator 4.1.4 is an effective requirement.	Refer to Indicator 4.1.4.
4.1.4 – "that include Indigenous peoples". Confusing; can be read as two-track process for planning and priority-setting – one with state, provincial and regional and one Indigenous people.	Reword the indicator to read as one track OR move this to new indicator 8.2.1.		2	Task Group believes that the revised language for Indicator 4.1.4 addresses the comment. Note that the reference to Indigenous Peoples has been removed from the indicator.	Refer to Ind. 4.1.4.
"credible - This is subjective; who decides; what does it mean?	Find a less subjective term OR remove the term OR use "recognize" instead		2	Task Group has reviewed the comment but is of the opinion that *credible* is the correct qualifier to be used in this indicator. It is used in the current Standard and prior version standards.	Refer to Ind. 4.1.4.
Credible is difficult to define	Use "science based" instead….OR define it….OR use "quality"….OR remove "credible"… OR use "applicable"		2	Task Group has reviewed the comment but is of the opinion that *credible* is the correct qualifier to be used in this indicator. It is used in the current Standard and prior version standards.	Refer to Ind. 4.1.4.
"Indigenous". Intent Not clear. What is their role?	Clarify it is not an independent process/separate process OR clarify in Guidance OR Add "When appropriate" in places for clarity Clarify it is not an independent process/separate process OR clarify in Guidance OR Add "When appropriate" in places for clarity		2	Task Group believes that the revised language for Indicator 4.1.4 addresses the comment. Note that the reference to Indigenous Peoples has been removed from the indicator.	Refer to Ind. 4.1.4.
Vague and doesn't result in conserving biological diversity; and it isn't measurable	Remove OR reword to make it measurable		2	Task Group has reviewed comment but believes that he draft Indicator 4.1.4 is an effective requirement.	Refer to Indicator 4.1.4.
Redundant with 18.1.4 – both are about being knowledgeable about credible conservation planning; 18.1.4 covers sourcing, managers, stakeholders			2	Task Group believes that the revised language for Indicator 4.1.4 addresses the comment.	Refer to Ind. 4.1.4.
Hard to audit. It is hard to find documents on planning that are complete, up to date and applicable for the intended outcome. Not sure this achieves the desired result	Provide and exception where efforts are not up to date or applicable OR add "could be"		2	Task Group believes that the revised language for Indicator 4.1.4 addresses the comment.	Refer to Ind. 4.1.4.
Why limited to just one stakeholder group - indigenous peoples?	Use a broader term to be more inclusive – like "stakeholders"		2	Task Group believes that the revised language for Indicator 4.1.4 addresses the comment. Note that the reference to Indigenous Peoples has been removed from the indicator.	Refer to Ind. 4.1.4.
Recognizing the political sensitivity - there is nothing that is gained from adding a specific reference to indigenous peoples to the decision making process. Does anyone really believe that they add any additional credible information to the managed forest landscapes in the US that are in their 3rd, 4th or more forests since European settlement?			2	Task Group believes that the revised language for Indicator 4.1.4 addresses the comment. Note that the reference to Indigenous Peoples has been removed from the indicator.	Refer to Ind. 4.1.4.
From an auditor's standpoint, "that include Indigenous peoples" would seem to exclude any efforts that do not include indigenous peoples, and in a lot of areas, there is no such consultation as part of these efforts	Ensure "that include Indigenous peoples" language is not used to eliminate otherwise credible efforts	Change to "that may include"	2	Task Group believes that the revised language for Indicator 4.1.4 addresses the comment. Note that the reference to	Refer to Ind. 4.1.4.

				Indigenous Peoples has been removed from the indicator.	
Change indicator wording	Not all conservation planning and priority-setting efforts have the involvement of Indigenous peoples	4. Certified Program Participants are knowledgeable about credible state, provincial, or regional conservation planning and priority-setting efforts, including those involving Indigenous peoples, to conserve biological diversity and consideration of these efforts in forest management planning. Examples of credible priority-setting efforts could be state wildlife action plans, state forest action plans, relevant habitat conservation plans or provincial wildlife recovery plans.	2	Task Group believes that the revised language for Indicator 4.1.4 addresses the comment. Note that the reference to Indigenous Peoples has been removed from the indicator.	Refer to Ind. 4.1.4.
language singles out Indigenous People unnecessarily	This indicator should highlight a broad range of stakeholders to consult during planning, not singling out Indigenous People	Use the old language from 17.1.5 that references a "broad range of stakeholders".....	2	Task Group believes that the revised language for Indicator 4.1.4 addresses the comment. Note that the reference to Indigenous Peoples has been removed from the indicator.	Refer to Ind. 4.1.4.
The standard, as written, implies that the only state, provincial, or regional conservation planning efforts a Certified Program Participant should be knowledgeable about are those that include Indigenous Peoples. This is not what we believe the intent of this indicator is and would suggest that the language be clarified.	To clarify the language of the Indicator to more clearly articulate its intent, add strength to the indicator, and make it consistent with other indicators containing similar language.	4.1.1 Certified Program Participants are knowledgeable about credible state, provincial, or regional conservation planning and priority-setting efforts, including, when appropriate, those of Indigenous Peoples, to conserve biological diversity and have a program to take into account the results of these efforts in planning. Examples of credible priority-setting efforts include but are not limited to state wildlife action plans, state forest action plans, relevant habitat conservation plans and provincial wildlife recovery plans.	2	Task Group believes that the revised language for Indicator 4.1.4 addresses the comment. Note that the reference to Indigenous Peoples has been removed from the indicator.	Refer to Ind. 4.1.4.
Remove Indigenous Peoples...also consider removal of this indicator as it is addressed in 18.1.4	Indigenous Peoples are addressed with addition of Objective 8 and are one of many considerations for conservation planning efforts		2	Task Group believes that the revised language for Indicator 4.1.4 addresses the comment. Note that the reference to Indigenous Peoples has been removed from the indicator.	Refer to Ind. 4.1.4.
Indicator 4.1.4 references the inclusion of Indigenous Peoples in conservation planning	It should be clear that this is only where it is appropriate to include federally recognized Indigenous Peoples… it will not be relevant in a number of places in the US.		2	Task Group believes that the revised language for Indicator 4.1.4 addresses the comment. Note that the reference to Indigenous Peoples has been removed from the indicator.	Refer to Ind. 4.1.4.
singles out Indigenous People unnecessarily	This indicator should highlight a broad range of stakeholders to consult during planning, not singling out Indigenous People	Use the old language from 17.1.5 that references a "broad range of stakeholders".....	2	Task Group believes that the revised language for Indicator 4.1.4 addresses the comment. Note that the reference to Indigenous Peoples has been removed from the indicator.	Refer to Ind. 4.1.4.
not enough detail or clarity on what this actually requires	not enough detail or clarity on what this actually requires	4.1.4 Certified Program Participants can demonstrate how they are incorporating credible state, provincial, or regional conservation planning and priority-setting efforts (that include Indigenous peoples where possible), to conserve biological diversity.	2	Task Group believes that the revised language for Indicator 4.1.4 addresses the comment.	Refer to Ind. 4.1.4.
Program Participants should not just be knowledgeable, but be required to demonstrate how they are doing this.	Recommend adopting clear auditable criteria.	Certified Program Participants can demonstrate how they are incorporating credible state,...	2	Task Group believes that the revised language for Indicator 4.1.4 addresses the comment.	Refer to Ind. 4.1.4.
The biodiversity indicators are dominated by language that is not		4.1.4 Certified Program Participants can demonstrate	2	Task Group believes that the revised	Refer to Ind. 4.1.4.

auditable, such as 4.1.4		how they are incorporating credible state, provincial, or regional conservation planning and priority-setting efforts that include Indigenous peoples where possible in forest management planning.		language for Indicator 4.1.4 addresses the comment.	
The insertion of "indigenous peoples" seems awkward, out of place and over-limiting.		Suggest removing the specific reference to "Indigenous people" or expanding to be more inclusive of a broader range of stakeholders	2	Task Group believes that the revised language for Indicator 4.1.4 addresses the comment. Note that the reference to Indigenous Peoples has been removed from the indicator.	Refer to Ind. 4.1.4.
Indicator 4.1.4 is redundant to Objective 8 with respect to reviewing and including First Nations' peoples concerns and interests throughout our planning and operations.	We request that the term Indigenous peoples be removed from this Indicator.	Certified Program Participants are knowledgeable about credible state, provincial, or regional conservation planning and priority-setting efforts. Examples include but are not limited to state level wildlife action plans and/or relevant habitat conservation plans.	2	Task Group believes that the revised language for Indicator 4.1.4 addresses the comment. Note that the reference to Indigenous Peoples has been removed from the indicator.	Refer to Ind. 4.1.4.
"Participants are knowledgeable about credible state, provincial, or regional conservation planning and priority-setting efforts that include Indigenous peoples to conserve biological diversity and consideration of these efforts in forest management planning." Really? How so?	Who suggests what are credible sources?	Rewrite to something less subject to interpretation or scrap entire.	2	Task Group has reviewed the comment but is of the opinion that *credible* is the correct qualifier to be used in this indicator. It is used in the current Standard and prior version standards.	Refer to Ind. 4.1.4.
including only Indigenous peoples as Stakeholders is not fair or consistent	Other stakeholders may be involved in the process	....include affected stakeholders to conserve	2	Task Group believes that the revised language for Indicator 4.1.4 addresses the comment. Note that the reference to Indigenous Peoples has been removed from the indicator.	Refer to Ind. 4.1.4.
PM 4.1.4 The term Indigenous Peoples should be defined and limited to federally recognized tribes in the U.S. and recognized First Nations in Canada.	The term is open to interpretation unless clearly defined.	Indigenous peoples: people, tribes, communities that are recognized by the U.S. federal government, or First Nations that are recognized by the government of Canada.	2	Task Group believes that the revised language for Indicator 4.1.4 addresses the comment. Note that the reference to Indigenous Peoples has been removed from the indicator.	Refer to Ind. 4.1.4.
5. Identification and *protection* of *non-forested* wetlands, including bogs, fens and marshes, and vernal pools of ecological significance.					
Good expansion to include "vernal pools."	Good expansion to include "vernal pools."	NA	3	Comment is supportive of the draft language for Indicator 4.1.6. Note new Indicator added as 4.1.5 so this indicator is now 4.1.6.	Refer to Ind. 4.1.6.
When do these types of wetlands become ecologically significant?		Scrap the term "ecological significance"	2	Task Group has reviewed the comment but is of the opinion that the removal of the term "ecological significance" does not enhance the requirement of the indicator. As such the term remains in the indicator. Note new Indicator added as 4.1.5 so this indicator is now 4.1.6.	Refer to Ind. 4.1.6
6. Participation in programs and demonstration of activities as appropriate to limit the introduction, spread and impact of *invasive exotic plants and* animals that directly threaten or are likely to threaten *native* plant and animal communities.					
7. Consider the role of natural disturbances in relation to biological diversity when developing forest management plans.					
Confusing – does it mean the role natural disturbance in creating biodiversity or removing biodiversity	Clarify or remove		2	Task Group has reviewed the comment and is of the opinion that the revised	Refer to Ind. 4.1.8.

				Indicator 4.1.8 continues to be an effective indicator. Note that due to the addition of a new Indicator 4.1.5 this indicator is now Indicator 4.1.8.	
Forest owners/operators do not plan on fire, wind events, insects and disease.	This would be a non-valued added stochasitic modelling process for forest practitioners. This item is best left for the research community.	removal of this indicator.	2	Task Group has reviewed the comment and is of the opinion that the revised Indicator 4.1.8 continues to be an effective indicator. Note that due to the addition of a new Indicator 4.1.5 this indicator is now Indicator 4.1.8.	Refer to Ind. 4.1.8.
not enough detail or clarity on what this actually requires	not enough detail or clarity on what this actually requires	4.1.7 Certified Program Participants take into account the role of natural disturbances in relation to biological diversity when developing forest management plans. Opening size, harvest layout, and structural retention are designed in proportions and configurations that are consistent with the characteristic natural disturbance regime in each community type. 4.1.8 Certified Program Participants identify and conserve globally, regionally and nationally significant large landscape areas with natural distribution and abundance of naturally occurring species.	2	Task Group has reviewed the comment and is of the opinion that the draft language for Indicator 4.1.8 addresses the comment regarding Indicator 4.1.7. The Task Group believes that the requirements of Performance Measures 4.2 and 4.3 address the comment proposing a new Indicator 4.1.8.	Refer to Ind. 4.1.8 and PM 4.2 and 4.3.
OK addition. Doesn't require land managers to mimic natural disturbance regimes, which can be impossible/inappropriate and difficult to audit to.	Strengthens connection to natural disturbance and at least requires program participants to consider it.	NA	3	Comment is supportive of draft language.	None
I have NO idea what you expect to occur with this statement	Another need for an interpreter?	Scrap this vague, undefinitive, feel good statement and tell us what you really want us to do.	2	Task Group has reviewed the comment and is of the opinion that the revised Indicator 4.1.8 continues to be an effective indicator. Note that due to the addition of a new Indicator 4.1.5 this indicator is now Indicator 4.1.8.	Refer to Ind. 4.1.8.
PM 4.1.7 Recommend changing the wording	Broader description to provide program participants with more flexibility.	"Allow flexibility in plans to account for natural disturbances in relation to biological diversity when developing forest management plans."	2	Task Group has reviewed the comment and is of the opinion that the draft language for Indicator 4.1.8 addresses the comment regarding 2010-2014 Indicator 4.1.7.	Refer to Ind. 4.1.8
Confusing – does it mean the role natural disturbance in creating biodiversity or removing biodiversity	Clarify or remove		2	Task Group has reviewed the comment and is of the opinion that the draft Indicator 4.1.8 continues to be an effective indicator. Note that due to the addition of a new Indicator 4.1.5 this indicator is now Indicator 4.1.8.	Refer to Ind. 4.1.8.
8. *Program* to use prescribed or natural fire when appropriate.					
4.1.8 – "Program to use". The term implies prescribed or natural fire must be used.	Use current wording from 2010-2014 Standard – "Program to incorporate the role of…".		2.	Task Group has removed the 2010-2014 Ind. 4.1.8 and combined it with draft Indicator 4.1.8. Task Group believes that draft Indicator 4.1.8 addresses the comment.	Refer to Ind. 4.1.8
Delete this indicator	As worded, "as appropriate" has little bearing as an indicator. Fire, mechanical, chemical use, etc. may all be "appropriate in proving PM 4.1	Delete	2	Task Group has reviewed the comment but is of the opinion that draft Indicator 4.1.8 is an effective requirement.	Refer to Ind. 4.1.8

Delete this indicator	Little value as an indicator. Many tools may help meet PM4.1.	Delete OR reword similar to #7 - "consider the role of prescribed or natural fire.....management plans or prescriptions."	2	Task Group has reviewed the comment but is of the opinion that draft Indicator 4.1.8 is an effective requirement.	Refer to Ind. 4.1.8
Ineffective language	As appropriate adds little value as an indicator.	Delete this indicator	2	Task Group has reviewed the comment but is of the opinion that draft Indicator 4.1.8 is an effective requirement.	Refer to Ind. 4.1.8
Good change ... the intent is to use prescribed fire ... not just consider it.	Strengthens indicator and connection to fire. Should help justify the appropriate use of prescribed fire where there may be public / social concern otherwise.	NA	2.	Task Group has removed the 2010-2014 Ind. 4.1.8 and combined it with draft Indicator 4.1.8. Task Group believes that draft Indicator 4.1.8 addresses the comment.	Refer to Ind. 4.1.8
It is unclear how performance measures with vague and ambiguous plan-based language are assessed and audited, and how SFI can claim any consistency in these areas of the program.		Certified Program Participants identify and conserve globally, regionally and nationally significant large landscape areas with natural distribution and abundance of naturally occurring species.	2	Task Group reviewed comment but not clear how the comment is related to the indicator.	

Performance Measure 4.2. *Certified Program Participants* shall protect *threatened and endangered species, Forests with Exceptional Conservation Values (FECV)* and *old growth forests.*

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
The word "Protect (ion)" occurs 49 times in the document. Additional discussion is needed regarding the word "Protect" as written/defined in the standard and cross reference with definition used in Standard. To date there hasn't been an issue with how the indicator has been written, but if the forest industry is ever challenged, companies would have a difficult time proving that they are protecting values such as species at risk 100% of the time. To many people, the word PROTECTION implies a "hands-off" approach to management, while the word CONSERVATION implies management through "wise use" of resources.		Use "conservation" in place of "protection" where management is implied as an appropriate practice.	3	Both *conservation* and *protection* are defined terms (SFI Section 13). *Protection* allows for management. *Conservation* as defined as protection of plant and animal habitat.	Refer to SFI Section 13
Good decision to add a separate performance measure. This strengthens and calls attention to FECVs. Although the SFI definition of "protect" allows flexibility to manage ... socially "protect" means something different than "conserve." Many FECVs need to be actively managed to maintain the FECV and it needs to be recognized and clearly communicated to auditors and program participants that the decision to combine FECVs with RTE species does NOT mean active management is precluded in these areas.	Strengthens FECV issue.	NA	3	Comment is supportive of draft Performance Measure language.	None
Again these terms: "Forests with Exceptional Conservation Values (FECV) and old growth forests" are vague, undefinative and subject to too much interpretation	This has limited impacts on sustainability, except that you fell better after you say it!	Scrap the statement	3	Terms *Forest with Exceptional Conservation Value* and *old growth forests* are defined terms (Section 13). Task Group believes Performance Measure continues to be is an effective requirement.	Refer to SFI Section 13

PM 4.2 Indicators:

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
1. Program to protect *threatened and endangered species*.					
Programs do not go far enough to protect threatened and endangered species.	Recommend adopting clear auditable criteria.	Protection of threatened and endangered species.	2	Task Group has reviewed comment but is of the opinion that current Indicator 4.2.1 language is auditable.	Refer to Ind. 4.2.1
Objective 4: Conservation of Biological Diversity including Forests with Exceptional Conservation Value. Measure 4.2, Indicator 1, SFI 2015-2019 standard - Needs to be more than a 'program' to protect endangered and threatened species. Use language that requires the use of the precautionary approach, and protects habitat.			2	The Task Group has reviewed the comment and believes that the concepts of *program* or *protection* as defined in the SFI Standard (SFI Section 13) address the comment.	None
2. *Program* to locate and protect known sites flora and fauna associated with viable occurrences of *critically imperiled* and *imperiled* species and communities also known as *Forests with Exceptional Conservation Value*. Plans for *protection* may be developed independently or collaboratively, and may include *Certified Program Participant* management, cooperation with other stakeholders, or use of easements, *conservation* land sales, exchanges, or other *conservation* strategies.					
Use spell-check - viable occurrences species exchanges,	words misspelled	Use spell-check	3	Editorial comment.	None
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.	SFI can and should play more of a role conserving vulnerable spp and communities -- these are species and community types that are on the decline, but have the greatest likelihood of regaining viability.	4.2.2 Program to locate and protect known sites flora and fauna associated with viable occurrences of critically imperiled and imperiled, and vulnerable species and communities.	2	Task Group has reviewed the comment and has developed Indicator 4.1.5 which it believes addresses the comment.	Refer to Ind. 4.1.5
Programs do not do far engough to protect such sites.	Recommend adopting clear auditable criteria.	Location and protection if known sites flora and fauna ...	2	Task Group has reviewed the comment and has developed Indicator 4.1.5 which it believes addresses the comment.	Refer to Ind. 4.1.5
Adopt clear, auditable landscape-level biodiversity indicators that meet PEFC requirements, moving toward the biodiversity-related elements of the HCV approach. Expand definitions of FECV to include all globally vulnerable species and communities.	Clear, auditable landscape-level biodiversity indicators should be adopted. Expand definitions of FECV to include all globally vulnerable species and communities.	Program to locate and protect known sites flora and fauna associated with viable occurrences of critically imperiled and imperiled, and vulnerable species and communities	2	Task Group has reviewed the comment and has developed Indicator 4.1.5 which it believes addresses the comment.	Refer to Ind. 4.1.5
Surely you could say what needs to do done, more succinctly and clearly and leave the platitudes at home.	This is too verbose and subject to too many interpretations.	Shorten it and make it clearer what is to be accomplished	2	Task Group has reviewed the comment but is of the opinion that the Indicator 4.2.2 is clear and auditable.	Refer to Ind. 4.2.2.
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	None provided. No specific change proposed.	None provided. No specific change proposed.	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	Refer to Performance Measures 4.1, 4.2, 4.3 and 4.4. See also Ind. 4.1.5.

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 (2010-2014): Indicators 4.1.2 and 4.1.3, and Guidance to SFI 2010-2014 Standard.				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, 4.3 and 4.4. Also, the Task Group has developed Indicator 4.1.5 to address significant species of concern.	
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. *Proposed new language requiring a "program to address conservation of biodiversity" during fiber sourcing within North America would do little to change this situation, given the utter lack of any required objectives or outcomes, and the non-applicability to SFI certified forests per se.*** **Relevant SFI provisions (2010-2014): Indicators 4.1.1 and 4.1.5, Objective 4 Conservation of Biological Diversity, and Objective 6 Protection of Special Sites. *Proposed new language: Performance Measure 9.1.***	None provided. No specific change proposed.	None provided. No specific change proposed.	2	The comments provided are not accurate in describing SFI Standard requirements. SFI has existing requirements to address conservation of biological diversity and protection of threatened and endangered species and critically imperiled and imperiled species. See Objectives 4, 6, 9, and 12. The Task Group has reviewed the comment regarding new Objective 9 and believes this is a significant step forward for the SFI fiber sourcing requirements, which no other forest standard in the world has.	None

3. Support and participation in plans or *programs* for the *conservation* of *old-growth forests* in the region of ownership.

not enough detail or clarity on what this actually requires	not enough detail or clarity on what this actually requires	4.2.3 In the lower 48, Certified Program Participants must identify and conserve any old-growth forests on their ownerships.	2	The Task Group has reviewed the comment but believes that the existing Indicator 4.2.3 continues to be an effective requirement particularly when put in the context of Performance Measure 4.1 and Performance Measure 4.3.	Refer to Ind. 4.2.3 and PM 4.1 and PM 4.3.
Support and participation in plans does not go far enough to conserve old growth.	There is not much old growth remaining in the lower 48 states. That which is left should be considered imperiled communities and subject to being identified and protected on certified lands.	In the lower 48 states, Certified Program Participants must identify and conserve any old-growth forests on their lands of ownership.	2	The Task Group has reviewed the comment but believes that the existing Indicator 4.2.3 continues to be an effective requirement particularly when put in the context of Performance Measure 4.1 and Performance Measure 4.3.	Refer to Ind. 4.2.3 and PM 4.1 and PM 4.3.
SFI standard requirements are generally plan- or program-based, which could be implemented with varying levels of rigor. It is unclear how performance measures with vague and ambiguous plan-based language are assessed and audited, and how SFI can claim any consistency in these areas of the program.	Plan- or program-based requirements could be implemented with varying levels of rigor. It is unclear how performance measures with vague and ambiguous plan-based language are assessed and audited, and how SFI can claim any consistency in these areas of the program.	In the lower 48, Certified Program Participants conserve any old-growth forests on their ownerships.	2	The Task Group has reviewed the comment and believes the program based requirements are effective means of implementing the standard elements. The terms policy, *plan* and *program* are defined terms and included in Section 13. The key to understanding how they work is to know that all of these terms are used to create a specified outcome. A program to do "X" means that the program must be structured in a way to achieve the "X". The requirements do not specify what is in the program, rather they specify the desired outcomes. So regardless of how elaborate or simple a program is, it must accomplish the outcome or an auditor would deem it insufficient and a non-conformity would be issued.	Refer to SFI Section13.
This should be specific to land owned by the Program Participant.		Suggest adding the words "on land owned by participants" after "old-growth forests."	2	Task Group has reviewed the comment and believes that the revised Indicator 4.2.3 addresses the comment.	Refer to Ind. 4.2.3.
If someone really wants to do this they are free to buy land and manage it to their own demise.	Mankind has not preserved nor conserved "old-growth" forests since the beginning of time -- what is a landowner's benefit for doing this?	Scrap the statement -- it's incredulous.	2	The Task Group has reviewed the comment but believes that the revised Indicator 4.2.3 continues to be an effective requirement particularly when put in the context of Performance Measure 4.1 and Performance Measure 4.3.	Refer to Ind. 4.2.3 and PM 4.1 and PM 4.3.

Performance Measure 4.3. *Certified Program Participants* shall manage ecologically important sites in a manner that takes into account their unique qualities.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
Keep this under Objective 6 - Special Sites	Special sites are ecologically, geologically, or culturally important or unique. Splitting out ecologically is not logical or necessary.	Remove PM 7.4 and retain existing language under Objective 6.	2	The Task Group has reviewed the comment but believes that Performance Measure 4.3 is an effective requirement as worded. The comment regarding PM 7.4 is unclear as their PM does not exist.	Refer to PM 4.3.
Vague: what is the definition of ecologically important sites? Does this mean protect above and beyond?	Define it, OR leave in Objective 6: Protection of Special Sites		2	Task Group has reviewed the comment but believes that the Performance Measures is an effective requirement.	Refer to PM 4.3.
Remove performance measure and indicator	Ecologically important sites not defined. Likely redundant with PM 3.2, Indicators 4.1.5 and 4.2.2.	None - remove performance measure and indicators. Update "special sites" definition in SFI Definitions to be consistent with Objective 6.	2	Task Group has reviewed the comment but believes that the Performance Measures is an effective requirement.	Refer to PM 4.3.
This is vague.	Clarify the intent.	...in a manner that maintains or enhances their ecological values.	2	Task Group has reviewed the comment but believes that the intent of Performance Measures is clear and auditable and is an effective requirement.	Refer to PM 4.3.
Language ("unique qualities") is a bit subjective and vague but OK.		NA	3	General Comment	None
Performance Measure 4.3 is duplicative of Performance Measure 4.2. Eliminate Performance Measure 4.3 and integrate 4.3 indicators with Performance Measure 4.2 indicators.	PM 4.3 is either duplicative of or overlapping PM 4.2.	Measure 4.3 and integrate 4.3 indicators with Performance Measure 4.2 indicators.	2	Task Group has reviewed the comment but believes that the Performance Measure 4.3 is an effective requirement and is one that has a different focus than Performance Measure 4.2.	Refer to PM 4.3.
"Takes into account" is too vague, subject to interpretation, difficult to audit.		Replace "that takes into account" with "to maintain."	2	Task Group has reviewed the comment but believes that the intent of Performance Measures is clear and auditable and is an effective requirement.	Refer to PM 4.3.

	The term 'ecologically important' should be defined by SFI Inc. in this upcoming Standard. The lack of definition leaves Program Participants exposed to defining this ourselves which may be in direct contrast to definitions developed external stakeholders and/or auditing teams. Furthermore, this lack of definition seems out of step with SFI Inc.'s work to define such socially charged words to provide clarity.	We request the term 'ecologically important' be defined in the 2015-2019 Standard.		2	The Task Group has reviewed the comment. The Task Group understands the issues associated with the use of this term but has decided not to define "ecologically important". As the concept of ecological importance can vary by region and jurisdiction, the Task Group felt it was better to leave the definition of the term to the Program Participant with the knowledge that the approach chosen to define ecological importance is subject to audit by the Program Participant's certification body.	None
	Once again, I can not visualize a clear picture of what this means.		Name the "ecologically important sites" and describe their "unique qualities" or scrap.	2	The Task Group has reviewed the comment. The Task Group understands the issues associated with the use of this term but has decided not to define "ecologically important". As the concept of ecological importance can vary by region and jurisdiction, the Task Group felt it was better to leave the definition of the term to the Program Participant with the knowledge that the approach chosen to define ecological importance is subject to audit by the Program Participant's certification body.	None

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 (2010-2014): Indicator 4.1.6.	None provided. No specific change proposed.	None provided. No specific change proposed.	2	The SFI Standard requires program participants to identify and protect ecologically significant forests, including *old-growth forests* and *Forests with Exceptional Conservation Valu*e. 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.	Refer to Performance Measures 4.1, 4.2, and 4.3.

PM 4.3 Indicators:

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
1. Use of information such as existing natural heritage data and expert advice in identifying or selecting ecologically important sites for *protection.*					
Remove performance measure and indicator	Ecologically important sites not defined. Likely redundant with PM 3.2, Indicators 4.1.5 and 4.2.2.	None - remove performance measure and indicators. Update "special sites" definition in SFI Definitions to be consistent with Objective 6.	2	Task Group has reviewed the comment but believes that Indicator 4.3.1 is an effective requirement.	Refer to Ind. 4.3.1
"Expert advice", yes we all would like to know where to find this.	If you must state such a vague suggestion, maybe you should be more definative on how to obtain the information that you want us to seek.	Name the "expert advice" or scrap.	2	Task Group has reviewed the comment but believes that Indicator 4.3.1 as written is an effective requirement.	Refer to Ind. 4.3.1
2. Appropriate mapping, cataloging and management of identified ecologically important sites.					
Remove performance measure and indicator	Likely redundant with PM 3.2, Indicators 4.1.5 and 4.2.2.	None - remove performance measure and indicators. Update "special sites" definition in SFI Definitions to be consistent with Objective 6.	2	Task Group has reviewed the comment but believes that Performance Measure 4.3 and Indicator 4.3.2 are effective requirements.	Refer to PM 4.3 and Ind. 4.3.2.
Who would define what an ecologically important site is?		Sites recognized as ecologically important are mapped.	2	Task Group has reviewed the comment but believes that Indicator 4.3.2 as written is an effective requirement as written.	Refer to Ind. 4.3.2.
Why is this necessary?	Is this "ecologically important" to the stakeholder or the public?	Tell us who is the beneficiary of all of the work that is involved here.	3	General Comment.	None

Performance Measure 4.4. *Certified 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.*

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
Now, you have said something that is clear, succinct, and easily understood.		All of the previous statements should ust this statement as a model of effectiveness.	3	General Comment	None

PM 4.4. Indicators:

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
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. **2. A methodology to incorporate research results and field applications of *biodiversity* and ecosystem research into forest management decisions.**					
Research results that will pass the scientific credibility test?	Suppose you suggest the methodology.		2	Task Group has reviewed the comment but believes that Performance Measure 4.4 continues to be an effective requirement.	Refer to PM 4.4.

Use this space to propose any removals or additions for Objective 4:

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
Add the following indicator: "Program to address habitat of significant species of concern that could be impacted by Certified Program Participant's management activities". Closes a bit of a gap between SFI and FSC without opening up consideration of all G3 and S1-S3 species.			2	Task Group has reviewed the comment and has developed draft Indicator 4.1.5 which is believes addresses the intent of the comment.	Refer to Ind. 4.1.5.
Add the following indicator to PM 4.2: Program to address habitat of significant species of concern that could be impacted by Certified Program Participant's management activities. This pulls in species of concern that should be addressed by CPPs, but does not require consideration of all G3s and S1-3.			2	Task Group has reviewed the comment and has developed draft Indicator 4.1.5 which is believes addresses the intent of the comment.	Refer to Ind. 4.1.5.
4.1.8 Certified Program Participants identify and conserve globally, regionally and nationally significant large landscape areas with natural distribution and abundance of naturally occurring species.			2	Task Group has reviewed the comment but is unclear how the comment relates to Indicator 4.4.2.	None

	The biodiversity indicators are dominated by language that is not auditable and do not include protection of globally vulnerable species and communities. It is unclear how performance measures with vague and ambiguous plan-based language are assessed and audited, and how SFI can claim any consistency in these areas of the program. SFI continues to point to Forests of Exceptional Conservation Value (FECV) as their analogue to High Conservation Value Forests. However, the FECV definition is limited to critically imperiled and imperiled species and communities. As such, FECV is currently a stand-level conservation concept. While indicators were added in this draft under Objective 4, the reality is that there are still no specific landscape, or coarse-scale, biodiversity indicators in the standard. As a result, it is very difficult to point to any tangible landscape-scale conservation results as a result of SFI. 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. 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." Additionally: At this point, there is very little old growth left in the lower 48 states. While we note the addition of performance measure 1.2, it is difficult to understand why SFI does not require the last remaining old-growth to be identified and protected on certified lands, and that all harvesting of old-growth in lower 48 be prohibited. Furthermore, the lack of explicit conservation of any old-growth in Objective 4, and the addition of old growth forests to PM 1.2, means that those forests could be vulnerable to the same loopholes that could be used to justify conversion of other forest types (see comments on conversion).			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, .4.2 and 4.3.

Objective 5. Management of Visual Quality and Recreational Benefits

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	Comment Review	Rationale	Revised or Proposed New language
Remove "for the public" which broadens the Objective and Indicators.	Most of these lands are private property. There are liability problems when you allow the public to enter and use these lands.	Delete "for the public."	2	Task Group has reviewed the comment but believes that Objective 5 as written is an effective requirement as written.	Refer to Objective 5.
The public has enough recreational opportunities without free-bees from investment minded stakeholders	Want recreation? Then purchase what you need in the market place.	Remove the statement " provide recreational opportunities for the public"	2	Task Group has reviewed the comment but believes that Objective 5 as written is an effective requirement as written.	Refer to Objective 5.

Performance Measure 5.1. *Program Participant*s shall manage the impact of harvesting on *visual quality*.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
Good, clear, succinct, and definitive understandable statement			3	Comment is supportive of existing Performance Measure language.	None

PM 5.1 Indicators

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
1. *Program* to address *visual quality* management.					
If it is being done you automatically have a program	Combine with 5.1.2		2	Task Group has reviewed the comment but is of the opinion that Indicators 5.1.1 and 5.1.2 are different in their application – one being the requirement to have a program and the other being the on-the-ground implementation of the program.	None
2. Incorporation of aesthetic considerations in harvesting, road, landing design and management, and other management activities where visual impacts are a concern.					

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

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
Remove performance measure and indicators.	Current research suggests that small block sizes are often not ecologically appropriate (i.e. increased forest fragmentation, edge effect, windfall, etc)	Incorporate wording of PM 5.2 into PM 5.1 indicators. Delete PM 5.2 indicators.	2	Task Group has reviewed the comment but believes that Performance Measure 5.2 as written is an effective requirement.	None
If we are managing visual impacts, then leave the size, shape and placement of clearcuts to the management.	No need for this statement if managing for visual impacts -- leave the how to the managers,	Scrap this PM	2	Task Group has reviewed the comment but believes that Performance Measure 5.2 as written is an effective requirement.	None

PM 5.2 indicators:

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
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.					
Does not work well on fire based landscapes	50ha is a small parcell of land when dealing with million plus ha tenures of fire origin stands. Small block size limits increase roading required and potentially increase impacts to distrubance sensitive species who require large areas of undisturbed forest.	Average size of clearcut /(50 ha), except when necessary to meet regulatory requirements, mimic natural disturbance models, or to respond to emergencies situations.	2	Task Group has reviewed the comment and believes that the revised Indicator 5.2.1 addresses the comment.	Refer to Ind. 5.2.1.
The average size of clearcut not exceeding 120 acres is arbitrary and may not be appropriate; this section is specific to visual quality, so this should only apply to harvests that are publicly visible	Add "on stands where visual quality and recreational benefits are an issue" OR move elsewhere… Only stands that are subject to visual quality should be subject to this limit, and used to determine the average size		2	Task Group has reviewed the comment but believes that Indicator 5.2.1 as written is an effective requirement.	None
Remove performance measure and indicators.	Current research suggests that small block sizes are often not ecologically appropriate (i.e. increased forest fragmentation, edge effect, windfall, etc)	Incorporate wording of PM 5.2 into PM 5.1 indicators. Delete PM 5.2 indicators.	2	Task Group has reviewed the comment but believes Performance Measure 5.2 and Indicator 5.2.1 as written are effective requirements.	None
Delete this indicator	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, and forest health needs (including salvage events).	Delete	2	Task Group has reviewed the comment but believes that Indicator 5.2.1 as written is an effective requirement.	None
Delete this indicator	The clearcut size of 120 acres is arbitrary. Even-aged harvest sizes and placement should be based on conditions. By adding a few small (1 ac) cuts you can greatly reduce the average.	Delete this indicator	2	Task Group has reviewed the comment but believes that Indicator 5.2.1 as written is an effective requirement.	None
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 has reviewed the comment and believes that the revised Indicator 5.2.1 addresses the comment.	Refer to Ind. 5.2.1.
Sustainability does not hinge on clearcut size. Would you limit the size of homes to 2,000 square feet?	Leave the size of clearcuts to be market determined -- too many extenuating circumstances to place a restriction on size	Scrap the statement	2	Task Group has reviewed the comment but believes that Indicator 5.2.1 as written is an effective requirement.	None
2. Documentation through internal records of clearcut size and the process for calculating average size.					
Remove performance measure and indicators.	Current research suggests that small block sizes are often not ecologically appropriate (i.e. increased forest fragmentation, edge effect, windfall, etc.)	Incorporate wording of PM 5.2 into PM 5.1 indicators. Delete PM 5.2 indicators.	2	Task Group has reviewed the comment but believes Performance Measure 5.2 and Indicator 5.2.2 as written are effective requirements.	None
There are so many games played with the calculation of average clearcut size as to make it a meaningless metric	Provide language for an auditor to use to limit the amount of games being played to stay below 120 acres.	Add "Calculation of average clearcut size must be done in a credible manner that considers the impact of opening size on visual quality"	2	The Task Group has reviewed the comment and believes that Indicator 5.2.2 as written continues to be an effective requirement. This requirement is subject	None

1 = final decision subject to review of language developed
2 = discussion required, comment may or may not be incorporated
3 = general comments, comments covered in other areas
4 = comments addressed by other SFI review task force

				to independent audit annually at which time discrepancies in calculation of average size of harvest opening would be identified.	
Not needed -- lacking tangible benefits to stakeholders	If you scrap statement #1 of PM 5.2; then you can remove statement #2, as well.	Remove the entire PM # 5.2	2	Task Group has reviewed the comment but believes Performance Measure 5.2 continues to be an effective requirement.	None
Performance Measure 5.2 Program Participants shall manage the size, shape and placement of clearcut harvests, Indicator 1, SFI 2015-2019 standard. 1. In natural (non-plantation) forests, SFI needs to explicitly require that the harvest systems be consistent with the natural disturbance regimes typical for forest type and natural region. 2. In forest-types where even-aged harvesting (clear-cutting) is deemed appropriate, SFI needs to require that the harvesting practices leave islands, peninsulas and patches of trees in patterns and abundance consistent with what would be left over after a typical stand replacing natural disturbance.			2	The Task Group has reviewed the comment and believes the existing requirements of the SFI Standard in Objectives 2, 3, 4 and 6 address the comments. SFI requirements address stand level retention structure, old-growth and FECV and sites with unique ecological features. Additional new requirements in PM 1.2 place further restrictions on the conversion of forest cover types.	Refer to PM 1.2

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

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
Once again you are determining the methods to be implemented for visual quality	Green-up requirements are difficult to implement and more difficult to manage the future investment that implements this strategy.	Remove PM # 5.3	2	Task Group has reviewed the comment but believes Performance Measure 5.3 an effective requirement.	None

PM 5.3 Indicators:

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
Delete this indicator	Why is it necessary to have a “program” to implement green-up requirements? Don’t 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? 5.3.1 is unnecessary.	Delete	2	Task Group has reviewed the comment but believes Indicator 5.3.1 continues to be an effective requirement.	None
Delete this indicator	5.3.2 and 5.3.3 both describe the methodology/program to achieve PM 5.3 and its green-up requirement.	Delete this indicator	2	Task Group has reviewed the comment but believes Indicator 5.3.1 continues to be an effective requirement.	None
Indicators 2 and 3 are the substance of a 'program'	Why does there need to be a program?	Delete this indicator as its value is embedded in Indicators 2 & 3 and it is unnecessary.	2	Task Group has reviewed the comment but believes Indicator 5.3.1 continues to be an effective requirement.	None

Green-up requirements are difficult to implement and more difficult to manage the future investment that implements this strategy.		Scrap	2	Task Group has reviewed the comment but believes Indicator 5.3.1 continues to be an effective requirement.	None
2. Harvest area tracking system to demonstrate conformance with the *green-up requirement* or alternative methods.					
Green-up requirements are difficult to implement and more difficult to manage the future investment that implements this strategy.		Scrap	2	Task Group has reviewed the comment but believes Indicator 5.3.2 continues to be an effective requirement.	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*.					
Green-up requirements are difficult to implement and more difficult to manage the future investment that implements this strategy.		Scrap	2	Task Group has reviewed the comment but believes Indicator 5.3.3 continues to be an effective requirement.	None

Performance Measure 5.4. *Program Participant*s shall support and promote recreational opportunities for the public.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
Remove "for the public."			2	Task Group has reviewed the comment but believes Performance Measure 5.4 continues to be an effective requirement as written.	None
This does not demonstrate nor promotes forest sustainability -- it does support the "handout" mentality of our present society.	Sure why not create another entitlement program; free recreation from others hard labors and liabilities.	Scrap	2	Task Group has reviewed the comment but believes Performance Measure 5.4 continues to be an effective requirement as written.	None

PM 5.4 Indicator:

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
Remove " for the public." See earlier comments.			2	Task Group has reviewed the comment but believes Indicator 5.4.1 continues to be an effective requirement as written.	None
This is better: "where consistent with stakeholder's forest management objectives.	If the stakeholder is in favor of providing recreational opportunities, then so be it!	See comment	2	Task Group has reviewed the comment but believes Indicator 5.4.1 continues to be an effective requirement as written.	None

Use this space to propose any removals or additions for Objective 5:

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
Add an additional Indicator (5.4.2) : To have only one Indicator for PM 5.4 seems very weak and general. 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.			2	Task Group has reviewed the comment but is of the opinion that the existing requirements of Performance Measure 5.4 would address the comment. There is nothing in PM 5.4 that would preclude doing what the comment advocates.	None
Add 5.4.2 - Evidence of an evaluation or process to determine the recreational pursuits that are consistent with forest management objectives. Can use a statewide comprehensive outdoor recreation plan as a basis for evaluation plus outreach to local recreationists or organized groups or associations.			2	Task Group has reviewed the comment but is of the opinion that the existing requirements of Performance Measure 5.4 would address the comment. There is nothing in PM 5.4 that would preclude doing what the comment advocates.	None

Objective 6. Protection of Special Sites

Objective 6. *Protection of Special Sites*. To manage lands that are geologically or *culturally important* in a manner that takes into account their unique qualities.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
Retain Ecological under this objective - remove from 4.3	See comment under 4.3	Retain 2010 - 2014 language	3	Comment is supportive of keeping existing language for this Objective.	None
Given the changes to this Objective, the scope has narrowed as items have been moved to other Objectives. It appears to me that it is no longer a stand alone Objective.	Scope is now too narrow to be a stand-alone Objective. These requirements would now fit quite nicely in Objective 1, Forest Management Planning. It is a planning exercise now and is narrower in scope than before.	Keep language, move these requirements to become PM 1.2 (earlier comment from me moves existing 1.2 back into Objective 2 where it belongs).	2	Task Group has reviewed the comment but believes that the Objective and its requirements as currently written continue to be effective.	None
Great change to move the ecological components into Objective 4! Thank you. This will reduce a lot of confusion during audits and with staff / managers of certified lands.	Moving the ecological components to Objective 4 is a logical and strategic move.	NA	2	Task Group has reviewed the comment but has decided to retain the 2010-2014 language of the Objective.	None
If the idea is to "protect" special sites, then why not included that in the Objective (i.e., rather than the vague "takes into account" verbage?		Replace "takes into account" with "maintains" or "protects."	2	Task Group has reviewed the comment but has decided to retain the 2010-2014 language of the Objective.	None
Is this stakeholder or bureacratically determined?	Stakeholders should make this determination based on the best scientific information that may be at their disposal	ADD" "as determined by stakeholder from best available scientific information"	2	Task Group has reviewed the comment but has decided to retain the 2010-2014 language of the Objective.	None

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

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language

It is unclear how performance measures with vague and ambiguous language are assessed and audited, and how SFI can claim any consistency in these areas of the program. Below is one of the many examples of vague, unauditable standard language along with suggested changes.			2	Task Group has reviewed the comment but has decided to retain the 2010-2014 language of the Objective. The Task Group believes that the requirements of the Performance Measure are measureable and effective.	None
If the idea is to "protect" special sites, then why not included that in the Objective (i.e., rather than the vague "takes into account" verbage?		Replace "in a manner appropriate for" with "to maintain" or "to protect"	2	Task Group has reviewed the comment but has decided to retain the 2010-2014 language of the Performance Measure. The concept of protection allows for management.	None
This is well stated and should be objective # 6 instead of PM # 6.1.	Better stated than objective #6.	Replace objective # 6 with PM # 6.1 and scrap the PM's. for special sites.	2	Task Group has reviewed the comment but has decided to retain the 2010-2014 language of the Performance Measure.	None

PM 6.1 Indicators:

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
1. Use of information such as existing natural heritage data, expert advice or stakeholder consultation in identifying or selecting *special sites* for *protection*					
Delete the term "Natural Heritage data"	Ecologically important sites have been moved to Objective 4	None	2	Task Group has reviewed the comment but has decided to retain the 2010-2014 language of Indicator 6.1. Task Group believes that it is important to address ecologically important sites in both Objective 4 and 6.	None
Replace natural heritage with cultural resources data	Natural heritage data is not suitable for identifying geologic or culturally important sites and Objective 4 (4.3.1) addresses use of natural heritage data		2	Task Group has reviewed the comment but has decided to retain the 2010-2014 language of the Objective. Task Group believes that it is important to address ecologically important sites in both Objective 4 and 6.	None
Delete the term "Natural Heritage data"	Ecologically important sites have been moved to Objective 4		2	Task Group has reviewed the comment but has decided to retain the 2010-2014 language of the Objective. Task Group believes that it is important to address ecologically important sites in both Objective 4 and 6.	None
All of these are important sources of information and should be used to idenitify special sites	clarifies expectations around information sources to identify special sites	Certified Program Participants identify and protect special sites on their properties through all of the following means: 1. Natural Heritage data on G1, G2, and G3 species and communities; 2. Stakeholder consultation, including local communities and indigenous peoples where present; 3. Cultural heritage and historical databases; and, 4. Local experts.	2	Task Group has reviewed the comment but has decided to retain the 2010-2014 language of the Objective. Regarding the comment about inclusion of G3 species the Task Group believes this is best addressed via new Indicator 4.1.5.	Refer to Ind. 4.1.5

Natural heritage data does not catalog special sites; it is only an ecological data base. Remove this reference to NHI data.	NHI does not catalog geologically or culturally important sites.	Use of information such as existing historical and archaeological data, expert advice or stakeholder consultation in identifying or selecting special sites for protection.	2	Task Group has reviewed the comment but has decided to retain the 2010-2014 language of the Objective.	None
Not sure if it's still appropriate to reference "natural heritage data" now that the ecological components have been moved elsewhere. Needs more discussion.	Not sure if it's still appropriate to reference "natural heritage data" now that the ecological components have been moved elsewhere. Needs more discussion.	Rethink inclusion of "natural heritage data." Possibly delete.	2	Task Group has reviewed the comment but has decided to retain the 2010-2014 language of the Objective.	None
It is unclear how performance measures with vague and ambiguous language are assessed and audited, and how SFI can claim any consistency in these areas of the program.	Language should be more clear, ensure consistent rigor, and be auditable.	Certified Program Participants identify and protect special sites on their properties through all of the following means: 1. Natural Heritage data on G1, G2, and G3, and S1, S2 and S3 species and communities; 2. Stakeholder consultation, including local communities and indigenous peoples where present; 3. Cultural heritage and historical databases; and, 4. Local experts.	2	Task Group has reviewed the comment but has decided to retain the 2010-2014 language of the Objective. Regarding the comment about inclusion of G3 species the Task Group believes this is best addressed via new Indicator 4.1.5.	Refer to Ind. 4.1.5
Natural heritage data is usually a reference to data for rare ecological resources. Suggest adding "field surveys" to potential information sources.	With ecological sites moved to Obj. 4, the reference to NH data should probably be removed here.	Suggest replacing "natural" with "cultural" heritage data.	2	Task Group has reviewed the comment but has decided to retain the 2010-2014 language of the Objective.	None
Same comments as the earlier, similar statement.		Scrap or better defined "what to do".	2	Task Group has reviewed the comment but has decided to retain the 2010-2014 language of the Objective. Task Group is of the opinion that the requirement continues to be effective and that the language is clear.	None
Delete the term "Natural Heritage data"	Ecologically important sites have been moved to Objective 4	None	2	Task Group has reviewed the comment but has decided to retain the 2010-2014 language of the Objective. Task Group believes that it is important to address ecologically important sites in both Objective 4 and 6.	None
2. Appropriate mapping, cataloging and management of identified *special sites*.					
For cultural resource sites in MN, management is done in consultation with the State Historic Preservation Office and, when appropriate, tribal stakeholders. Cultural site management conforms to state and federal historic preservation law. In other words, the level of appropriate management is not determined by DNR, but by external agents.	Just a point of information. No change suggested.		3	General Comment..	None

Use this space to propose any removals or additions for Objective 6:

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
See comments under PM 4.3 - Retain language from 2010 - 2014 Standard for special sites and keep in Objective 6.			2	Task Group has reviewed the comment and has decided to retain the existing 201-2014 language for Objective 6.	None

1 = final decision subject to review of language developed
2 = discussion required, comment may or may not be incorporated
3 = general comments, comments covered in other areas
4 = comments addressed by other SFI review task force

Another benefit of this is that you can now keep Objective 8 as procurement and have the new Indigenous People's Rights become Objective 6. Objective 8 has been associated with the "break" between land management requirements (1-7) and the beginning of procurement requirements since 2001.			3	General comment regarding structuring of Objectives.	None
Change the Principle and definition of "special sites" by dropping the "ecological" reference in order to be consistent with the new Objective and Indicator language.			2	Task Group has decided to retain the existing 2010-2014 language for the Objective and the Principle.	None

Objective 7. Efficient Use of Fiber Resources

Objective 7. Efficient Use of Fiber Resources. To promote the efficient use of fiber resources.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
What makes you think that this is not presently occurring?			3	General comment.	None

Performance Measure 7.1. *Program Participants* shall employ appropriate forest harvesting technology and in-woods manufacturing processes and practices to *minimize* waste and ensure efficient utilization of harvested trees, where consistent with other *SFI Standard objectives*.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
Of critical business importance. However, in reality this is addressed through economic considerations. I have never seen or heard of a legitimate finding against these criteria.			3	General comment.	None
		How about "where consistent with local markets", as well.	2	The Task Group has reviewed the comment but believes that the suggested revision is already incorporated into the Objective language: efficient utilization is directly tied to local market conditions.	None

PM 7.1 Indicator:

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
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 the potential of increased fuels build-up) and other utilization needs; b. training or incentives to encourage loggers to enhance utilization; c. exploration of markets for underutilized species and low-grade wood and alternative markets (e.g. bioenergy markets); or d. periodic inspections and reports noting utilization and product separation					

Do you believe that the industry isn't practicing this currently?	Well we are where markets are well developed.	I'm glad your first consideration for this was "economic"; social considerations are costly.	3	General comment.	

Use this space to propose any removals or additions for Objective 7:

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
Part c of the 2010-2014 standard which encourages cooperation with mill managers to better utilize low grade material is left out. This leaves all the focus on loggers to utilize the resources and gives the mills the liberty to set their specs to a high quality level so that the loggers are forced to waste resources but aren't given an alternative resource for the "waste". That's how it is in my experience in NW Ontario. The mill manager has to work as a team with the loggers and not only for himself. There is growing concern and public complaint about the large piles of "waste" that only a few years ago the same mill was utilizing. But with the competition being removed due to previously poor market conditions, the mill has too much wood available to them and isn't concerned about resource utilization anymore. Leaving part C out will be detrimental to the SFI standards reputation in remote areas where there is limited market for lower grade resources and species.			2	Comment does not want 2010-2014 Ind. 7.1.1 (c) removed from PM. Comment is concerned that existing Objective 7 allows mill managers to set specs that are too high therefore encouraging waste. However, emergence of bioenergy markets means that utilization is increasing giving an opportunity to use all forms of fiber: saw log, veneer log, pulp log, OSB, pellet stock, etc.	None

Objective 8 - Recognize and Respect Indigenous Peoples' Rights.

Objective 8. Recognize and Respect Indigenous Peoples' Rights. To recognize and respect Indigenous Peoples' rights and traditional knowledge.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
Remove this objective.	This is a Government to Government type of relationship which does not apply to a typical private forest landowner. This sounds politically motivated rather than based on scientific silviculture and sustainable forestry.	Remove this objective.	2	Task Group disagrees with the comment. Comment misses the fact that there are many Program Participants that interact with indigenous peoples outside of any government agency prescribed consultation process.	None

Could be too vague … Any and all tribes? Defined by whom? Add "federally and provincially recognized" tribes.			2	Task Group has reviewed the comment and concurs with the need to link the requirements for Objective 8 to those Tribes and First Nations that are officially recognized by the US or Canadian federal government. The listing of recognized Tribes and First Nations can be found in SFI Section 13 – Definition for Indigenous Peoples.	Refer to SFI Section 13.
Anchor forest – economic viability… is there a fit for economic in this objective for anchor forestry?			2	The Task Group has reviewed the comment and is of the opinion that nothing in the Objective 8 requirements would preclude recognition of "anchor forests". Therefore it has decided that specific reference to anchor forest has not been inserted into the requirements.	None
Says that you have to "recognize and respect…" - How do you demonstrate compliance? What is auditable?	Need to add specifics while allowing flexibility		2	Task Group has reviewed the requirements for the proposed Objective 8. Performance Measures 8.1 and 8.2 are actually existing requirements and have been found to be well understood and effective requirements. Performance Measure 8.3 has been revised by the Task Group to make it more auditable.	Refer to PM. 8.3
There needs to be more education of Indigenous people of the benefits of the SFI program. SFI develop materials for education of the benefits of SFI for Indigenous people.			3	Task Group believes that Objective 8 will assist in improving communications with Indigenous Peoples regarding goals and benefits of SFI.	None
This is government to government relationship, not managers or landowners; how would a purchaser know whom to talk with?			2	Task Group has reviewed the comment and concurs with the need to link the requirements for Objective 8 to those Tribes and First Nations that are officially recognized by the US or Canadian federal government. The listing of recognized Tribes and First Nations can be found in SFI Section 13 – Definition for Indigenous Peoples.	Refer to SFI Section 13.
Redundant with regulation and legal compliance objective (Obj 15), particularly on public lands	Add a determination of whether there is an impact on indigenous peoples must be done first and if so, then comply with Obj 8. Need guidance about how to determine relevance of these issues on a particular property		2	The Task Group has reviewed the comment and believes that the determination process being proposed in the comment is actually part of the analysis that needs to be concluded when determining impact to Tribes and Frist Nations.	None

Definition – "Indigenous". Use federally listed or federally recognized.			2	Task Group has reviewed the comment and concurs with the need to link the requirements for Objective 8 to those Tribes and First Nations that are officially recognized by the US or Canadian federal government. The listing of recognized Tribes and First Nations can be found in SFI Section 13 – Definition for Indigenous Peoples.	Refer to SFI Section 13.
Why elevate or call out one group of stakeholders? Indigenous people are one group of a set of stakeholders	Use "People's" instead of "indigenous" OR use "Stakeholders" AND have an indicator for indigenous peoples		2	Task Group has reviewed the comment but is of the opinion that Indigenous Peoples are separate from other "stakeholders" as is illustrated by their unique legal status and recognition by the US and Canadian federal governments.	None
Good to have; makes the Standard more credible			3	Comment is supportive of the draft language.	None
How would compliance be demonstrated? "Rights" is vague – whose and what rights?			2	The Task Group has reviewed the comments. The "rights" referenced in the Objective requirements are those legally defined rights as determined by the US and Canadian governments.	None
How much is required – does an entity have to reach out or only respond if contacted? What's the expectation? Uncertainty between a passive or active requirement	Clarify AND/OR strengthen to remove ambiguity		2	Task Group has reviewed the comments and believes that the revised requirements when taken in their entirety are clear and auditable.	Refer to PM 8.3.
Indigenous/tribal is a government to government relationship; why would a private land owner need to engage with tribes	Add an overarching statement to clarify the government to government relationship		2	Task Group has reviewed the comment and is of the opinion that while government agencies do play the lead role in consultation with Indigenous Peoples there is also a complimentary role to be played by private land owners.	Refer to PM 8.3.
"rights" - What does this mean?			2	The Task Group has reviewed the comments. The rights referenced in the Objective requirements are those legally defined rights as determined by the US and Canadian governments.	None

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. *Proposed changes to the* *Standard would reorganize the Standard's various provisions relating to Indigenous Peoples under a new Objective focused specifically on the topic, would require a policy commitment to recognize and respect the rights of Indigenous Peoples, would "encourage" managers of private forests to "communicate with or respond to local Indigenous Peoples with regard to sustainable forest management practices," and would require managers to "acknowledge an awareness of traditional forest related knowledge, such as known heritage sites, the use of wood in traditional buildings and craft, and flora…," and respond to inquiries from Indigenous Peoples. Improving communications with Indigenous Peoples is of course quite important, and elevating the visibility of Indigenous Peoples' issues within the Standard can also be valuable. However, these new provisions fall far short of requiring compliance with the concept of "free prior informed consent." Likewise, the new language still does not require any resource protections, forest management improvements, or other outcomes where tribal rights and resources may be affected, both in public and privately anaged forests. Noteworthy proposed changes to the SFI Chain of Custody Standard and Label Rules would also include Indigenous Peoples' "property, tenure, and use rights" among the definition of "Controversial Sources" to be avoided in cases where those rules apply; however, the requirements for assessing and avoiding such sources continues to lack meaningful performance measures or required outcomes.* Relevant SFI provisions (2010-2014): Objective 17 Community Involvement and its indicators, Performance Measure 18.2 and Indicator 18.2.1. *Proposed new language: Performance Measure 8.1 and its Indicators; SFI Standard section 3.7; SFI Label Rules sections 5.6 and 6.1.*	None provided. No specific change proposed.	None provided. No specific change proposed.	2	The Task Group has reviewed the comments but is of the opinion comments overlook 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 believes the proposed new Objective 8 which will group all requirements for addressing Indigenous Peoples rights is a positive step. This Objective now has provisions for public and private forest lands. In addition, there are numerous laws, regulations and treaties that address Indigenous Peoples Rights that SFI program participants must follow.	Refer to PM 8.1, PM 8.2, and PM 8.3.

First Nations and Indigenous People's Rights: Objective 8, Recognize and Respect Indigenous Peoples' Rights, and Performance Measure 14.1, SFI 2015-2019 standard. The objective and Performance Measure 8. 2 needs to move beyond conferring with Indigenous peoples, and also include a need to negotiate and implement agreements with Indigenous Peoples/First Nations. This is very important and legally required in the Canadian context, where there are ongoing and significant conflicts between logging companies and First Nations.	The SFI standard needs to embrace and require current best management practice on this issue including the need to negotiate and implement agreements with local First Nations around the world (Canada included) on addressing issues such: • Co-management and sharing in decisions critical to local First Nations communities • Sharing in the economic benefits of forest management • Recognize Free Prior and Informed Consent (FPIC) of First Nations and Indigenous Peoples.		2	The Task Group has reviewed the comment and has the following response. In the Canadian context it is the responsibility of the Federal government to address issues like co-management of resources and sharing of economic benefits in conjunction with the applicable Provincial governments. Program Participants holding public tenures are therefore bound by this structure. However, outside of these processes Program Participants can and do enter into MoU and other forms of agreements with FNs at the local level regarding capacity building, training and joint ventures. Regarding the issue of FPIC the SFI Forest Management Standard recognizes and adopts the principles outlined in the United Nations Declaration for the Rights of Indigenous Peoples (UNDRIP). The Declaration says that consideration should be given for Indigenous Peoples' rights to maintain and strengthen their distinct spiritual relationship with their traditionally owned or otherwise used lands and territories. In adopting the UNDRIP articles SFI Program Participants are encouraged to communicate and collaborate with local Indigenous Peoples in order to better understand their traditional practices and experiences with respect to forest management.	None
"rights" - What does this mean? How are they identified?			2	The Task Group has reviewed the comments. The rights referenced in the Objective requirements are those legally defined rights as determined by the US and Canadian governments.	None
While the term "conféré" is a proper translation for "confer" it is problematic because it is never used and means nothing to Standard users in this context.	Recommend the use of the term "conversé" or "discuter".		2	Comment will be addressed when the French translation is prepared.	None

Indigenous people's rights – no definition of rights – are we referring to federal treaty rights or rights in terms of rights in the land.	Define and reinsert the clarification from previous comment period. Modify guidance in section 6 to facilitate these definitions. (Use Task group recommendation and add to the guidance. Particularly important in the French/Quebec context. What are first nations? What are the rights we are speaking about?)		2	The Task Group has reviewed the comments. The rights referenced in the Objective requirements are those legally defined rights as determined by the US and Canadian governments.	None
Remove this objective.	This is a Government to Government type of relationship which does not apply to a typical private forest landowner. This sounds politically motivated rather than based on scientific silviculture and sustainable forestry.	Remove this objective.	2	Task Group disagrees with the comment. Comment misses the fact that there are many Program Participants that interact with indigenous peoples outside of any government agency prescribed consultation process.	None
Define indigenous people	for increased understanding.	Narrow scope to federal or state recognized groups	2	Task Group has reviewed the comment and concurs with the need to link the requirements for Objective 8 to those Tribes and First Nations that are officially recognized by the US or Canadian federal government. The listing of recognized Tribes and First Nations can be found in SFI Section 13 – Definition for Indigenous Peoples.	Refer to SFI Section 13.
In Canada the negotiations or rights occur between governments of the First Nations and the Federal/Provincial counterparts. Therefore this needs to be the overarching consideration of SFI Program Participants.			2	Task Group has reviewed the comment and is of the opinion that while government agencies do play the lead role in consultation with Indigenous Peoples there is also a complimentary role to be played by private land owners.	Refer to PM 8.3.
Delete this objective	Indigenous Peoples' rights were very well addressed under the old Objective 18 and more appropriately focused on public land managers.	Revert to old language in Objective 18.	2	Task Group believes the comment misses the fact that there are many Program Participants that interact with indigenous peoples outside of any government agency prescribed consultation process. Also, the Task Group is of the opinion that Indigenous Peoples are separate from other "stakeholders" as is illustrated by their unique legal status and recognition by the US and Canadian federal governments.	None

The current SFI Standard 2010-2014 has already provided for indicators that consider indigenous values.	The current SFI Standard 2010-2014 has already provided for indicators that consider indigenous values.	We prefer to maintain the existing indicators and not evolve into the development of a new objective. However, if SFI decides to move forward with the new Objective then there needs to be more guidance placed around Objective 8 to inform Program Participants as to SFI's expectations on satisfying these requirements. In addition, SFI needs to place careful attention to the wording used within the indicators, so as to ensure requirements are verifiable, and not open to interpretation.	2	Task Group has reviewed the comment and has revised the Performance Measure language to provide more clarity and improve auditability of the requirements.	Refer to Objective 8 – Performance Measures 8.1, 8.2 and 8.3.
This is a new Objective that probably has more significance in Canada, but may have some US implications. Public land managers will need to be aware of and consult with Indigenous Peoples where you need to be aware of spiritually/culturally significant lands. Private landowners need to communicate with and respond to local indigenous peoples	We have concerns that burdening private landowners with this additional responsibility will not result in any tangible improvement in sustainable management.	For clarity, it might be helpful to capitalize "Public Lands" and "Private Lands."	2	Also, the Task Group is of the opinion that while government agencies do play the lead role in consultation with Indigenous Peoples there is also a complimentary role to be played by private land owners -there are many Program Participants that interact with indigenous peoples outside of any government agency prescribed consultation process. .	None
Delete this objective	Indigenous Peoples' rights were very well addressed under the old Objective 18.	Revert to old language in old Objective 18.	2	Task Group disagrees with the comment. Comment misses the fact that there are many Program Participants that interact with indigenous peoples outside of any government agency prescribed consultation process.	None
Add a definition for Indigenous Peoples that is for the USA 'federally recognized tribes'			2	Task Group has reviewed the comment and concurs with the need to link the requirements for Objective 8 to those Tribes and First Nations that are officially recognized by the US or Canadian federal government. The listing of recognized Tribes and First Nations can be found in SFI Section 13 – Definition for Indigenous Peoples.	Refer to SFI Section 13.
Make this Objective 6	See earlier comments re Objective 6 requirements moving to Objective 1. Objective 8 should continue to be the starting point for procurement--has been that way since 2001.	No changes; just make this Objective 6.	3	General comment - wants this Objective moved to Objective 6.	None

Good decision to create a separate Objective for these elements. Strengthens focus on Indigenous Peoples. Indigenous Peoples needs a definition ... and should be narrowly focused on federally or state recognized tribes, etc.	Indigenous peoples is too broad, undefined.	Define Indigenous Peoples and narrow focus on federal and state recognized tribes and legally determined rights.	2	Task Group has reviewed the comment and concurs with the need to link the requirements for Objective 8 to those Tribes and First Nations that are officially recognized by the US or Canadian federal government. The listing of recognized Tribes and First Nations can be found in SFI Section 13 – Definition for Indigenous Peoples.	Refer to SFI Section 13.
The use of the terms "recognize and respect" can be controversial for private land owners whereby First Nations people in the region either have not settled to treaty or are dissatisfied by the treaty that applies to their nation.	This term can potentially place private land owners at a conflict of interest.	To acknowledge and respect Indigenous Peoples' rights and traditional knowledge.	2	Task Group has reviewed the comment. The wording for the Objective was purposely written as "recognize and respect" as this aligns with language used by the US and Canadian federal government as well as the UN Declaration of the Rights of Indigenous Peoples.	None
Please restate in English. If indigenous people were interested in the land they would still own it!	Vague and undefinitive statement that only creates emotional response.	Recognize and respect how?	3	General comment.	None

Performance Measure 8.1 *Certified Program Participants* shall recognize and respect Indigenous Peoples' rights.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
No definition - Who? Any and all? And it is unclear what the intent of the contact is	Add "where appropriate" and "federally recognized" OR Define it in definitions section.		2	Task Group has reviewed the comment and concurs with the need to link the requirements for Objective 8 to those Tribes and First Nations that are officially recognized by the US or Canadian federal government. The listing of recognized Tribes and First Nations can be found in SFI Section 13 – Definition for Indigenous Peoples.	Refer to SFI Section 13.
Delete this PM (assuming this Objective is retained)	PM 8.1 is not needed and is adequately addressed by the indicators for PM 8.2	None	2	The Task Group has reviewed the comment and is of the opinion that the requirement for a policy (8.1) and a program (8.2) is complimentary and will keep the two Performance Measures separate.	Refer to Performance Measures 8.1 and 8.2.

If the entire objective is not deleted - then delete this PM.	PM 8.1 is sufficiently and more explicitly addressed in PM8.2.	Delete this PM.	2	The Task Group has reviewed the comment and is of the opinion that the requirement for a policy (8.1) and a program (8.2) is complimentary and will keep the two Performance Measures separate.	Refer to Performance Measures 8.1 and 8.2.
this just restates the objective			3	General comment.	None

PM 8.1 Indicator:

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
1. *Certified Program Participants* will provide a written policy acknowledging a commitment					
We don't need a policy...consider a statement..."Certified program participants will recognize the rights of indigenous peoples".	Needs to be in context with the rights of tenure holders.		2	Task Group has reviewed the comment but is of the opinion that this requirement continues to be effective.	None
8.1.1 – "written policy". "Policy" has specific meaning to some and unclear to others; also, "policy" can be a target for advocacy groups or public.	Remove "written policy" and leave "…will acknowledge a commitment…."		2	Comment misses the fact that this is an existing requirement. Task Group does not agree with the suggested revision.	None
Indigenous people's rights – no definition of rights – are we referring to federal treaty rights or rights in terms of rights in the land.			2	The Task Group has reviewed the comments. The "rights" referenced in the Objective requirements are those legally defined rights as determined by the US and Canadian governments.	None
Why don't we just recognize and respect the rights of all people?			2	Task Group has reviewed the comment but is of the opinion that Indigenous Peoples are separate from other "stakeholders" as is illustrated by their unique legal status and recognition by the US and Canadian federal governments.	None
The way the current draft wording reads it could be a long time until a participant does anything tangible. It seems to indicate a need to put a policy in place that acknowledges that we'll do something in the future.	Actions speak louder than words	Change wording to "Certified Program Participants will demonstrate a recognition and respect for the rights of Indigenous People."	2	Task Group has reviewed the comment and believes the requirement for a policy separate from a program ensures the program participants makes a formal commitment (8.1) an then demonstrates that commitment with an action oriented program (PM 8.2).	None
There are concerns around the words "Indigenous Peoples Rights."	SFI has not provided a clear definition as to what this term means. As in the case with Resolute Forest Products in Quebec, the company was stripped of 3 FSC certificates, one of which was due to land claim disputes currently unresolved with the Government of Quebec.	SFI needs to distinguish between the rights established under the treaties signed by First Nations and the Federal Government or the perceived right or ownership of public lands and resources often claimed by First Nations but not legally designated (unresolved treaty land entitlement disputes with provincial/federal governments).	2	The Task Group has reviewed the comments. The "rights" referenced in the Objective requirements are those legally defined rights as determined by the US and Canadian governments.	None

OK ... although it is a little unclear what constitutes a "written policy," especially on private land. Unclear scope.	Clarify	Clarify	2	Task Group has reviewed the comment but is of the opinion that the requirement for Indicator 8.1.1 is clear. Note that this is an existing requirement from SFI 2010-2014.	None
OK; then what? Now that we have a policy, then the problem (if we knew what it was) is solved.	Give us some techniques to ponder, not platitudes.	Scrap or rewrite suggesting techniques to consider that will promote recognition and respect.	2	Comment is requesting techniques that would promote "recognition and respect". Task Group believes that the responsibility is with the program participant to determine the measures (techniques) it is going to use to meet this indicator.	None

Performance Measure 8.2 *Certified Program Participants* with forest management responsibilities on public lands shall confer with affected Indigenous Peoples with respect to sustainable forestry.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
This measure does not apply to a typical purchaser of timber on public lands unless it is spelled out in the sale by the government agency offering the sale. This is beyond the scope and abilities of a typical program participant.	Beyond the scope, resources, and ability of a typical program participant.	Remove or reword to apply to a government agency or non-typical program participant - where this is relevant.	2	Task Group has reviewed the comment but believes that the comment is confusing the existing requirement to "confer" with Indigenous Peoples and the obligation to "consult" which is the role of government agencies.	None
Why use "confer" instead of "consult"? FSC uses consult which wins them points.			2	"Consultation" is the term used specifically for communications between government agencies and Indigenous Peoples.	None
Use of the word "Affecter" can be interpreted differently depending on who is asked the questions.	Clarify what is meant by "affecter"		2	Comment relates to the use of French equivalent of "consult" – comment to be addressed in the French translation of the SFI 2015-2019 Objective 8.	None
Must consider government requirements first.		Certified Program Participants with forest management responsibilities on public lands shall confer with affected Indigenous Peoples with respect to sustainable forestry in accordance with government requirements.	2	Task Group has reviewed the comment but does not believe the proposed revision would enhance the requirement of the Performance Measure.	Refer to PM 8.2.
The only caution is that the certification bodies cannot influence formal court mandates or State Legislation in response to Federal Treaties.			3	General comment – this requirement does not require Program Participant to influence any legal processes.	None
Better stated than Objective # 8	Objective 8 is vague and relatively useless prose.	Replace objective # 8 with this statement from PM # 8.2.	2	Task Group has reviewed the comment but does not believe the proposed revision would enhance the requirement of the Performance Measure.	Refer to PM 8.2.

PM 8.2 Indicators:

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
1. Program that includes communicating with affected Indigenous Peoples to enable *Certified Program participants* to: a)understand and respect traditional forest-related knowledge; b) identify and protect spiritually, historically, or culturally important sites; c) address the use of non-timber forest products of value to Indigenous Peoples in areas where *certified Program Participants* have management responsibilities on public lands; and d) have a process to receive and respond to Indigenous Peoples' inquiries regarding concerns received.					
If different in timeline and requirement than provincial guidelines, it may create more work			2	The Task Group has reviewed the comment and does not believe the requirements for Indicator 8.2.1 mandates a timeline different from that used in government agency consultation with Indigenous People.	None
Change to “known sites”	Tribes may not identify special sites.		2	Task Group has reviewed the comment but believes that the proposed language for Indicator 8.2.1 is effective and addresses the intent of the comment.	None
Remove or reword - see PM comments			2	Task Group has reviewed the comment but believes that the comment is confusing the existing requirement to “confer” with Indigenous Peoples and the obligation to “consult” which is the role of government agencies.	None
What is a reasonable attempt to “confer”? Is it a letter, call, one-on-one meeting, open house, etc	Clarify what constitutes a reasonable attempt to confer, especially when the community does not have an interest in engaging.		2	This is an existing requirement from the SFI 2010-2014. The determination of what constitutes a “reasonable” attempt to confer is something the certification body judges in the process of its annual audits.	None
The term “respect” is problematic because it is difficult to respect “knowledge”.	Could be in “acknowledge” in English – “reconnais” or “reconnaitre” in French.		2	Comment relates to the use of French equivalent of “respect” – comment to be addressed in the French translation of the SFI 2015-2019 Objective 8.	None
How can you verify that you have “respected”. What are the tools to facilitate this?	Clarify what kinds of tools can be used to demonstrate that “respect” or “acknowledgement” has taken place.		2	This is an existing requirement from the SFI 2010-2014. The determination of what tools can effectively demonstrate ”respect” is something the certification body judges in the process of its annual audits.	None
Should we not respond to “requests” as much as “concerns”? More positive in terms of approach.	Respond to indigenous people’s inquiries, concerns or requests.		2	The Task Group has reviewed the comment and concurs with the suggested revision. The Task Group believes the revised Ind. 8.2.1 and Ind. 8.3.2.	Refer to Ind. 8.2.1 and 8.3.2.

Remove or reword - see PM comments			2	Task Group has reviewed the comment but believes that Indicator 8.2.1 continues to be an effective requirement.	None
a) This indicator may be very difficult to demonstrate for Program Participants, as it is largely open to interpretation by certification auditors and First Nations groups. d) Information is shared between forest product companies and participating First Nation groups, often as concerns arise by the communities regarding logging activity that may be planned on traditional areas. For example, but also in the form of requests for assistance on First Nations research, requests for First Nations forestry training or interest in developing First Nations business opportunities.	a) The word "respect" in itself is impracticable within the context of an indicator, as its meaning or demonstration of the word may differ depending on whom the auditor is interviewing (forest company vs. First Nations groups). d) Indicator 1.d is asking for Program Participants to identify a process to receive and respond to Indigenous Peoples inquiries regarding concerns received, but does not ask for how we respond to First Nation matters other than concerns raised about forest management activities.	a) The word "respect" needs to be replaced with "acknowledge" or a word that is easily verifiable and not open to opinion and interpretation. b)Use the following: "Consider, where information is available, and protect spiritually, historically, or culturally important sites" d) In order to be inclusive of both the positive aspects as well as some of the not so positive issues that may be raised through First Nation and company information sharing sessions, a suggested change to the current wording of Indicator 1 d) has been made below: "Have a process to receive and respond to Indigenous Peoples' inquiries, concerns and/or requests."	2	Regarding Ind. 8.2.1 (a) the Task Group has reviewed the comment. The wording for Indicator 8.2.1(a) was purposely written to use the word " respect" as this aligns with language used by the US and Canadian federal government as well as the UN Declaration of the Rights of Indigenous Peoples. Regarding 8.2.1 (b) and (c) the task group believes the proposed revisions do not enhance the Indicator. Regarding Ind. 8.2.1 (d) the task Group concurs and has revised Ind. 8.2.1 (d).	Refer to Ind. 8.2.1.

Performance Measure 8.3. *Certified Program Participants* with forest management responsibilities on private lands are encouraged to communicate with and/or respond to local Indigenous Peoples with respect to sustainable forest management practices.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
This PM is not relevant to the typical program participant.	This PM is not relevant to the typical program participant.	Remove or reword to specify where and to whom this applies.	2	Comment misses the fact that this is directed at private forest land owners.	None
Confusing – do we reach out and find them or do we respond when they contact us? "Encourage to communicate" implies we reach out to find them.	Reword to clarify to whom it applies OR add "where applicable" to shift the burden from landowners reaching out, to landowners responding		2	Task Group has reviewed the comment and believes that the revised PM 8.3 addresses the comment. "	Refer to PM 8.3. *Certified Program Participants' are encouraged to communicate with and shall respond to local Indigenous Peoples with respect to sustainable forest management practices on their private lands."*
Good way to improve communications			2	Comment is supportive of draft language.	None
How is compliance defined, particularly in the in the U.S. context. How are rights defined? Who's rights?	Define compliance in more detail.		2	Task Group has reviewed the comment and believes that the revised PM 8.3 addresses the comment. However, the comment has a reference to "compliance" which does not appear in the Performance Measure. (Note that PM 8.3 has been revised since the release of the Jan-Mar 2014 Survey.)	Refer to PM 8.3.
Inconsistency of auditors – some interpret this as a de facto "shall" requirement			2	Task Group has reviewed the comment and believes that the revised PM 8.3 addresses the comment.	Refer to PM 8.3 above.

Aboriginals don't have rights on private lands. How do you verify "encourage"?	Noble goal. Don't want to impose but encourage those reach out.		2	Task Group has reviewed the comment and believes that the revised PM 8.3 addresses the comment. Comment makes reference to "rights" however, the Task Group notes that the performance measure does not focus on "rights" but is focused on communication with Indigenous peoples. (Note that PM 8.3 has been revised since the release of the Jan-Mar 2014 Survey.)	Refer to PM 8.3 above.
Private lands – small woodlots or other size. Should we introduce a question of size?	(Establish a threshold at which the PM 8.3 would be applicable)		2	The requirements of Objective 8 and Performance Measure 8.3 are applicable to all private landowners undertaking SFI certification regardless of the size of their forest management operations.	None
Will this lead to different implementation in the U.S. and Canada?	Would it make sense to adapt the standard for different regions? Strength of the Standard per others is that there is advantage to one		2	Task Group believes that the revised requirements for PM 8.3 can be implemented regardless of jurisdiction.	Refer to PM 8.3.
Concern is that we haven't clearly identified the rights of the landowner	Clarify the rights of the landowner. Respect rights of landowner.		2	The Task Group believes that the requirements for Performance Measure 8.3 do not infringe on the property rights of land owners.	None
Remove this performance measure	Private lands are under control of the landowner. Consultation with Indigenous Peoples is not a legislated requirement.	Remove from standard	2	Task Group has reviewed the comment and is of the opinion that while government agencies do play the lead role in consultation with Indigenous Peoples there is also a complimentary role to be played by private land owners.	Refer to PM 8.3.
Delete this PM	This PM is unauditable.	None.	2	Task Group has reviewed the comment and believes that the revised PM 8.3 addresses the comment.	Refer to PM 8.3.

Although Program Participants can provide information in the form of brochures and photos regarding the items listed in Indicator 1, First Nation Peoples do not have treaty right on private lands. Forest product companies can provide the information to the private land owner regarding such things as cultural heritage sites that may be present on their lands prior to harvest operations, but ultimately it is at the discretion of the landowner as to how the land is managed over the short and long-term.	Program Participants have no control over how private lands are managed once all the conditions of the contract have been met and wood fiber is delivered to the facility.	Remove P.M 8.3 completely.	2	Task Group has reviewed the comment and is of the opinion that while government agencies do play the lead role in consultation with Indigenous Peoples there is also a complimentary role to be played by private land owners.	Refer to PM 8.3.
Delete this PM.	This PM would be difficult to audit and the general intent is accomplished by PM 8.2.	Delete this PM.	2	Task Group has reviewed the comment and is of the opinion that while government agencies do play the lead role in consultation with Indigenous Peoples there is also a complimentary role to be played by private land owners.	Refer to PM 8.3.
	"are encouraged to" is not appropriate language for a forest management standard -- it makes the PM meaningless	8.3. Certified Program Participants with forest management responsibilities on private lands communicate with and/or respond to affected Indigenous Peoples with respect to sustainable forest management practices.	2	Task Group has reviewed the comment and believes that the revised PM 8.3 addresses the comment. (Note that PM 8.3 has been revised since the release of the Jan-Mar 2014 Survey.)	Refer to PM 8.3 above.
PM 8.3 does not add any value beyond that stated in PM 8.2.	Redundant with PM 8.2.1	Delete PM 8.3	2	Task Group has reviewed the comment and is of the opinion that while government agencies do play the lead role in consultation with Indigenous Peoples there is also a complimentary role to be played by private land owners.	Refer to PM 8.3.
"Encouragement" is unclear, does not guarantee rigor, and is not auditable. SFI standard requirements such as this can be implemented with varying levels of rigor. It is unclear how performance measures with vague and ambiguous language are assessed and audited, and how SFI can claim any consistency in these areas of the program. 8.3 is one of the many examples of vague, unauditable standard language along with suggested changes.	Language should be more clear, more rigorous, and auditable.	Certified Program Participants with forest management responsibilities on private lands communicate with and/or respond to affected Indigenous Peoples with respect to sustainable forest management practices.	2	Task Group has reviewed the comment and believes that the revised PM 8.3 addresses the comment. (Note that PM 8.3 has been revised since the release of the Jan-Mar 2014 Survey.)	Refer to PM 8.3 above.
Good, only on public lands			2	Comment misunderstands that his PM would be applicable to private lands.	None
Indigenous Peoples: SFI needs to define this term. It is unclear if the intent is to limit this to federally-recognized tribes, or if any local tribe/band or grouping of individuals would qualify. Understanding the scope becomes critically important when dealing with additional requirements on private land. The desired outcome/action of Performance measure 8.3.1 and its Indicators as currently written is unclear and needs clarification.			2	Task Group has reviewed the comment and concurs with the need to link the requirements for Objective 8 to those Tribes and First Nations that are officially recognized by the US or Canadian federal government. The listing of recognized Tribes and First Nations can be found in SFI Section 13 – Definition for Indigenous Peoples.	Refer to SFI Section 13.

PM 8.3 Indicators:

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
1. Acknowledge an awareness of traditional forest-related knowledge, such as known cultural heritage sites, the use of wood in traditional buildings and crafts, and flora that may be used in cultural practices for food, ceremonies or medicine.					
Is this true on private lands as well? Vague indicator. Indicators generally mean shall, so how would this be audited – level of effort or mandatory? What happens if it isn't done, if a landowner does not do this? What if you don't have any indigenous people?	Indicators are more specific, so it solves the problem. EX/ 8.2.1 Include the word "Shall". AND add "where appropriate" is in place.		2	Comment misses on the fact that this is applicable to Private landowners.	None
How would spiritual concerns be addressed in "sustainable forest management practices"	Refer to specific sites – not entire landscape… OR delete "sustainable forest management practices"		2	Task Group has reviewed the comment but is of the opinion that the revised Ind. 8.3.1 addresses the intent of the comment.	Refer to Ind. 8.3.1
Beyond scope of typical program participant - remove.	Beyond scope, resources, and abilities of typical program participant.	Remove.	2	Task Group has reviewed the comment and is of the opinion that while government agencies do play the lead role in consultation with Indigenous Peoples there is also a complimentary role to be played by private land owners.	Refer to PM 8.3.
8.3.1 - There may be more than the "such as" examples given. Use of "acknowledge" is unclear – does it mean admit or demonstrate?	It is not intended to be an inclusive list. Remove "acknowledge", use "demonstrate".		2	Task Group has reviewed the comment but is of the opinion that the revised Ind. 8.3.1 addresses the intent of the comment.	Refer to Ind. 8.3.1
8.3.1 is vague. Redundant from an auditing standpoint. Both 8.1.1 and 8.3.1 recognize indigenous.– if you have a policy "to recognize and respect" wouldn't that "acknowledge an awareness of traditional…knowledge"	Remove 8.3.1, leave 8.1.1 (which is more auditable) and add "and respond as appropriate		2	Task Group has reviewed the comment but is of the opinion that the revised Ind. 8.3.1 addresses the intent of the comment.	Refer to Ind. 8.3.1
How would this be audited? Does it really mean anything for someone to acknowledge they are aware local indigenous peoples used wood in traditional buildings and crafts; and flora for food and medicine?			2	Task Group has reviewed the comment but is of the opinion that the revised Ind. 8.3.1 addresses the intent of the comment.	Refer to Ind. 8.3.1
	Actions speak louder than words	Change "Acknowledge an awareness ...." to "Demonstrate an awareness ...."	2	Task Group has reviewed the comment but is of the opinion that the revised Ind. 8.3.1 addresses the intent of the comment.	Refer to Ind. 8.3.1
add forest conservation priorities	this would address objective 4 and 18	1. Acknowledge an awareness of traditional forest-related knowledge, such as known cultural heritage sites, conservation priorities, the use of wood in traditional buildings and crafts, and flora that may be used in cultural practices for food, ceremonies or medicine.	2	Task Group has reviewed the comment but is of the opinion that inclusion of conservation priorities is better dealt with in the context of Ind. 4.1.4 *"incorporate the results of state, provincial, or regional conservation planning and priority-setting efforts"* which could include indigenous peoples' conservation	Refer to Ind. 4.1.4

				priorities.	
As written, this is not auditable. What would be audited to prove that private landowners have "acknowledge[d] an awareness of traditional forest-related knowledge ..." and what would the expected outcome be once this is acknowledged? It may be completely unrealistic to expect many private landowners (especially small NIPFs) to communicate with tribes in order to gain an "awareness of tradition knowledge." We understand that the indicator doesn't include "shall" language ... but many indicators don't use that word and they are all audited as if they were absolute requirements. This indicator will likely be interpreted that way by program participants, auditors, and certainly the indigenous peoples communities which have requested and pushed for this acknowledgement. Somehow SFI needs to clarify just what exactly they expect private landowners to do ... and if there is no required outcome or action as a result of the newly found "awareness," then the indicator really accomplishes nothing.	Confusing and very subjective. As written, this is not auditable. What would be audited to prove that private landowners have "acknowledge[d] an awareness of traditional forest-related knowledge ..." and what would the expected outcome be once this is acknowledged? It may be completely unrealistic to expect many private landowners (especially small NIPFs) to communicate with tribes in order to gain an "awareness of tradition knowledge." We understand that the indicator doesn't include "shall" language ... but many indicators don't use that word and they are all audited as if they were absolute requirements. This indicator will likely be interpreted that way by program participants, auditors, and certainly the indigenous peoples communities which have requested and pushed for this acknowledgement. Somehow SFI needs to clarify just what exactly they expect private landowners to do ... and if there is no required outcome or action as a result of the newly found "awareness," then the indicator really accomplishes nothing.	Reword and clarify the exact intent and desired outcome/action. Possibly delete if there truly is not required action.	2	Task Group has reviewed the comment but is of the opinion that the revised Ind. 8.3.1 addresses the intent of the comment.	Refer to Ind. 8.3.1
2. Respond to Indigenous peoples' inquiries regarding concerns received.					
Beyond the scope of typical program participant - not necessary.	Beyond scope of typical program participant - remove.		2	Task Group has reviewed the comment but believes that there is scope for private land owners responding to concerns of Indigenous Peoples.	None
More problematic – not auditable. What response would be considered compliant? What is auditable? What happens if you don't "respond"?	Clarify in interpretations. A nonresponse is a response. Leave it as is		2	The Task Group believes the revised indicator addresses the comment.	Refer to Ind. 8.3.2.
Why don't we just respond to all peoples concerns regarding our management?			3	General comment.	None
Is this really appropriate to expect from small, NIPFs? How would they even know how/who to respond to. Many tribes prefer to confer in person and this may not be appropriate to expect of small, private landowners. We agree with the intent for larger industrial landowners.	Is this really appropriate to expect from small, NIPFs? How would they even know how/who to respond to. Many tribes prefer to confer in person and this may not be appropriate to expect of small, private landowners. We agree with the intent for larger industrial landowners.	Needs more discussion.	2	The Task Group is of the opinion that the requirements of Objective 8 and Performance Measure 8.3 can be implemented all private landowners undertaking SFI certification regardless of the size of their forest management operations.	None
Respond how?	Need something slightly more specific.	Scrap	2	Task Group has reviewed the comment and is of the opinion that while government agencies do play the lead role in consultation with Indigenous Peoples there is also a complimentary role to be played by private land owners.	Refer to PM 8.3.

Objective 9. Biodiversity in Fiber Sourcing.

To broaden the practice of sustainable forestry by conserving biological diversity.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
What level is it intended for –Landowner? What if you buy directly from the landowner?	Clarify this is producer and not direct to landowners. AND Clarify/define producer, wood dealer…		1	The task group has reviewed the comment and believes the requirement is clear. These requirements are intended for implementation by the fiber sourcing organization which has signed a written agreement with the wood producer or a landowner.	Refer to the SFI 2015-2019 Fiber Sourcing Standard Objective 2.
Biodiversity is a management or landowner decision. How would procurement impact with management decisions	Move into management objectives OR remove because it is redundant OR move to Obj 18 Landowner Outreach		2	Task Group has reviewed the comment but is of the opinion that the commenter misses the intent of the objective which is to address biodiversity within fiber sourcing not land management.	Refer to the SFI 2015-2019 Fiber Sourcing Standard Objective 1.
Natural History programs are overwhelmed with data requests; gathering information may be more difficult			3	General comment but a valid observation.	None
Is this requiring a risk assessment? If so that is adding burden.			2	Task Group has reviewed the comment and but is of the opinion that the reference to a risk assessment is misplaced. The assessments required for this objective are in support of a program for conservation of biodiversity which is not the same as a risk assessment which is typically focused on sourcing from *controversial sources*.	Refer to the SFI 2015-2019 Fiber Sourcing Standard Objectives 4, 11 & 12.
This also is a new objective. It affects procurement operations not land managers. Primary producers need to get involved in efforts such as state wildlife action plans or regional conservation plans.	As long as smaller producers can meet this through participation on a State Implementation Committee it should not represent an undue burden on operations which would otherwise have difficulty adding needed staff to do this.		3	Comment is supportive of the proposed new SFI 2015-2019 Fiber Sourcing Standard Objective 1.	None
We are supportive of the revised language addressing biodiversity in fiber sourcing			3	Comment is supportive of the proposed new SFI 2015-2019 Fiber Sourcing Standard Objective 1.	None

7	I do not know how fiber sourcing conserves biological diversity	What special techniques must someone apply in fiber sourcing to conserve biological diversity?	Rewrite the objective more definitively2 or Scrap.	1	The task group has reviewed the comment and believes the requirements for implementation of this Objective are clear. These requirements are intended for implementation by the fiber sourcing organization which has signed a written agreement with the wood producer or a landowner.	Refer to the SFI 2015-2019 Fiber Sourcing Standard Objective 1.

Performance Measure 9.1. Promotion and conservation of biological diversity.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
Objective 9 is a new provision that is unclear and potentially overreaching. It appears to be trying to replace current performance measure 8.1, which requires that fiber purchasers educate suppliers about and encourage the use of a number of elements of sustainable forestry. 8.1 does not, however, require fiber purchasers to boycott landowners who choose not to use the practices recommended by the purchasers. 8.1 contrasts with 10.1, which requires the use of BMPs to protect water quality. The differences reflect a careful balance between the goals of promoting sustainable forestry and protecting competition, addressing risks under antitrust laws. Water quality is a public resource, biodiversity is usually not, unless on public lands. Water quality is widely regulated; biodiversity is usually not on private lands, except for take of threatened and endangered species of wildlife (not plants). Landowners rarely are entitled to compensation for protecting water quality, but participate in a number of incentive programs and work with conservation groups and land trusts to protect biodiversity. Biodiversity protection is an important part of the SFI standard for landowners, who voluntarily choose to certify their lands and who can decide if the costs are unreasonable and choose not to participate. The fiber sourcing provisions, however, impose requirements on landowners who have not chosen to participate – they are involuntary participants. Any requirements of them must be strictly limited to those necessary to achieve widely accepted public benefits, and use the least restrictive means to accomplish them.	As proposed 9.1 is unclear and potentially overreaching. It calls for a program to address biodiversity conservation, but doesn't say by whom. Is it the certified mill, as a requirement to buy fiber? Or is it a requirement for uncertified landowners, who want to sell to certified mills? The latter would clearly be unworkable, given the millions of family forest owners who supply timber to SFI-certified mills. Assuming it is the former, the requirements are vague (e.g., "other credible approaches") and confusing ("shall" have a program but only including "some" things) that auditors could easily swing between accepting almost anything as compliant to requiring an extensive program. Because the fiber sourcing provisions can strongly affect competitiveness among fiber purchasers, the provisions need to be clear so that different auditors reach the same results. The current approach – promotion and education – is clear and reasonable, but has been moved to Objective 18. Consider deleting the new Objective 9, since it is covered in Objective 18, or revise to complement Objective 18 by bringing the requirements reflected there to the woodbasket level.	Either delete this objective entirely or revise as follows: Objective 9 – Biodiversity in Fiber Sourcing. To broaden the practice of sustainable forestry by promoting conservation of biodiversity in fiber sourcing. Performance Measure 9.1. Program participants shall use the information developed collaboratively under Objective 18.1.2 to promote the voluntary conservation of biodiversity within their fiber sourcing areas. Indicators: 1. Program to promote the voluntary conservation of biodiversity within relevant fiber sourcing areas including but not limited to outreach and education as required under 18.1.2, participation in conservation efforts under 18.1.3, and awareness and planning efforts under 18.1.4. 2. Participation in credible collaborative assessments of biodiversity within or including relevant fiber sourcing areas assessments.	2	The Task Group has reviewed the comment but is of the opinion that the proposed revision in the comment does not enhance the current language in the draft Performance Measure.	Refer to the SFI 2015-2019 Fiber Sourcing Standard Performance Measure 1.1.
We are supportive of the revised language addressing biodiversity which specifies inclusion of possible activites in 9.1.			3	Comment s supportive of the proposed Performance Measure.	Refer to the SFI 2015-2019 Fiber Sourcing Standard Performance Measure 1.1.
Indicator 9.1.1. is redundant for Program Participants that are already required to use best available information in the promotion and conservation of biological diversity.	We request that this Indicator be removed from consideration for the new Standard for Program Participants.		2	Task Group has reviewed the comment but is of the opinion that Indicator 9.1.1 enhances the requirements of the standard.	Refer to the SFI 2015-2019 Fiber Sourcing Standard Performance Measure 1.1.

This says nothing	A performance measure must have something to accomplish, something to perform, otherwise it can't be measured.	Scrap	2	Task Group has reviewed the comment but is of the opinion that Performance Measure 9.1 enhances the requirements of the standard.	Refer to the SFI 2015-2019 Fiber Sourcing Standard Performance Measure 1.1.

PM 9.1 Indicators:

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
1. *Program* to address conservation of biodiversity, individually or collaboratively, which shall include some of the following: a. promotion of biological diversity utilizing information from organizations such as World Resources Institute, The Nature Conservancy, NatureServe, Conservation International, State Wildlife Action Plans, State Forest Action Plans and assessments; b. conducting local regional level landscape assessments; c. involvement with local or regional conservation efforts; d. other credible approaches; and e. relevant information on					
Other than the obvious, it is unclear who this applies to; who is communicating whom?		Clarify who is communicating expectations to whom using multiple scenarios AND/OR apply to the neutral portion in the Chain of Custody. AND, add "if the source is SFI certified than indicators 9.1.1 and 9.1.2 don't apply. *(Typo "Program" should be in italic)*	2	The task group has reviewed the comment and believes the requirement is clear. These requirements are intended for implementation by the fiber sourcing organization which has signed a written agreement with the *wood producer* or a landowner. If the source is SFI certified then the organization should obtain evidence of this fact.	Refer to the SFI 2015-2019 Fiber Sourcing Standard Performance Measure 1.1 and 2.1.
Unclear how many is "some", how many would be in compliance	Clarify the minimum required (ex. "at least 1"; or "at least 2")		3	Task Group has reviewed the comment and believes the revised Indicator 9.1.1 addresses the comment.	Refer to the SFI 2015-2019 Fiber Sourcing Standard Indicator 1.1.1.
9.1.1.b - Unclear how to conduct assessment on lands not in your control. And, what about small, two-truck, businesses.			2	Task Group has reviewed the comment and is of the opinion that the requirements for Indicator 9.1.1(b) are clear. The assessment is to be at the local or regional level not at the individual landowner.	Refer to the SFI 2015-2019 Fiber Sourcing Standard Indicator 1.1.1.
9.1.1. b. Does this mean compliance is leading conservation efforts or is it just participating in efforts?	Remove "conducting", use "participate in" …OR add "or participate in"		2	Task Group reviewed the comment but believes the Indicator as written is an effective requirement.	Refer to the SFI 2015-2019 Fiber Sourcing Standard Indicator 1.1.1
9.1.1 a. - Add Habitat Conservation Plan to the "such as".			2	The Task Group has reviewed the comment. The list of organizations/tools referenced is not meant to be absolute but is there as examples. Habitat Conservation Plans could be another example of a resource to be considered to meet this Indicator.	Refer to the SFI 2015-2019 Fiber Sourcing Standard Indicator 1.1.1. 1.1.1.
What is meant is by program? What is expectation?	Remove "program", use "strategy" instead		3	Program is defined term in Section 13.	None
9.1.1 & 18.1.4 Redundant - how are these different? Both are programs to address conservation? 18.1.4 is not limited to indigenous peoples; you must already have a program under 9.1.1.	Remove 18.1.4 to reduce amount of auditing		3	The Task Group has reviewed the comment and concurs with the removal the reference to *Indigenous Peoples* in the indicator. The Task Group believes the	Refer to SFI 2015-2019 Fiber Sourcing Standard

				comment regarding redundancy will be addressed that with the creation of a separate Fiber Sourcing standard.	
9.1.1.a-e Confusing whether limited to only these	Add "but not limited to"		1	Task Group has reviewed the comment and is of the opinion that the expectation for Indicator 9.1.1 is clear: one of more of the requirements listed in (a) – (e).	Refer to the SFI 2015-2019 Fiber Sourcing Standard Indicator 1.1.1.
Will a program have the intended impact to conserve biological diversity?	Balance a need to include this idea and recognize these are management decisions OR Move to Obj 18		3	General comment	None
9.1.1.b – "local or regional conservation effort". What is the definition?			2	Task Group has reviewed the comment but is of the opinion that what constitutes a conservation effort(s) is best left to the *certified program participants* to determine as this will vary across geographies.	Refer to the SFI 2015-2019 Fiber Sourcing Standard Indicator 1.1.1
What is required with the term "program"?			3	Program is defined term in Section 13.	None
Many of these indicators are broad in scope and unattainable by a single program participant. While program participants should be knowledgeable of such efforts, they should not be required to participate or promote specific plans.	This requirement appears to go beyond the scope or potential capability of personnel for program participants.	1. Program to be aware and knowledgeable of the conservation of biodiversity, individually or collaboratively, which shall include some of the following:	2	The Task Group has reviewed the comment but believes the suggested revision does not enhance the requirements for the draft Indicator 9.1.1.	Refer to the SFI 2015-2019 Fiber Sourcing Standard Indicator 1.1.1
Guidance is needed as to the level of "involvement with local or regional conservation efforts".	LP currently relies on NatureServe data in the U.S, and on Provincial and Federal "Species At Risk" Acts with Listings in Canada to help identify FECV's and species designated as threatened or endangered that may be found in areas where fiber is sourced; however, there is some question as to whether this level of involvement would currently satisfy this requirement or would additional efforts be required. Indicator 1 a) to d) require further guidance in order to help direct Program Participants in satisfying these listed indicators. As they are currently written, the indicators are too broad and may create some uncertainty as to whether evidence presented within the Participants program meets and/or satisfies the indicators listed e.g. local and regional landscape assessments.	"Program to address conservation of biodiversity, individually or collaboratively, which shall include one or more of the following"… 1.a) Add "or other legislated government listing." 1.b) Change "Conducting" to "Participating in local and regional level landscape assessments" Also, SFI needs to provide a definition for "regional and landscape assessment."	2	The Task Group has reviewed the comment. Regarding Indicator 9.1.1 (a), the list of organizations/tools referenced is not meant to be absolute but is there as examples. "Or other legislated government listing" could be another example of a resource to be considered to meet this Indicator. Regarding Indictor 9.1.1 (b) the task group believes the suggested revision does not enhance the requirement. Finally the Task Group is of the opinion that what constitutes a "local and regional level landscape assessment" is best left to the *certified program participants* to determine as this will vary across geographies.	Refer to the SFI 2015-2019 Fiber Sourcing Standard Indicator 1.1.1
Indicator 9.1.1 provides specific expectations for this new objective		It should be changed to read "Program to address conservation of biodiversity, individually or collaboratively, which should include, but not be limited to some of the following…".	2	Task Group has reviewed the comment and believes the revised Indicator 9.1.1 addresses the comment.	Refer to the SFI 2015-2019 Fiber Sourcing Standard Indicator 1.1.1
supportive. Developing programs that address biodiversity enables SFI to promote ongoing work as well as to develop additional tools for use.			3	General comment supportive of the proposed Indicator.	Refer to the SFI 2015-2019 Fiber Sourcing Standard Indicator 1.1.1
A program alone is not adequate to address biodiversity conservation on fiber sourcing lands.	Recommend including an indicator requiring a risk assessment process to screen for controversial sources – not just illegal - along with auditable language to assess whether biodiversity has been considered on fiber sourcing lands.		2	Task Group has reviewed the comment and believes the requirements for Indicator 9.1.1 are clear and auditable. Regarding the comment suggesting the need for a risk assessment that goes beyond illegal logging the Task Group is of the opinion that assessing for the risk of	Refer to the SFI 2015-2019 Fiber Sourcing Standard Objectives 1, 2 and 5.

				illegal logging and the use of *best management practices* by *qualified logging professionals* addresses the risk of receiving fiber from *controversial sources.*	
Yes, this is better, but what must I do to have this considered as accomplished?	Site something specific to accomplish, otherwise	Rewrite or Scrap	3	Task Group is of the opinion that the Indicator 9.1.1 as currently written will be an effective requirement.	Refer to the SFI 2015-2019 Fiber Sourcing Standard Indicator 1.1.1
Recommend changing the wording of Indicator 1 to "Program to address conservation of biodiversity, individually or collaboratively, which shall include some of the following or other relevant sources:"	Increase flexibility	"Program to address conservation of biodiversity, individually or collaboratively, which shall include some of the following or other relevant sources:"	2	The Task Group has reviewed the comment and believes that the Indicator 9.1.1 will address the comment.	Refer to the SFI 2015-2019 Fiber Sourcing Standard Indicator 1.1.1
2. *Program* to address *Forests with Exceptional Conservation Value* in harvests of *purchased stumpage*.					
A program alone is not adequate to address biodiversity conservation on fiber sourcing lands.	Recommend including an indicator requiring a risk assessment process to screen for controversial sources – not just illegal - along with auditable language to assess whether biodiversity has been considered on fiber sourcing lands.		2	Task Group has reviewed the comment and believes the requirements for Indicator 9.1.1 are clear and auditable. Regarding the comment suggesting the need for a risk assessment that goes beyond illegal logging the Task Group is of the opinion that assessing for the risk of *illegal logging* and the use of *best management practices* by *qualified logging professionals* addresses the risk of receiving fiber from *controversial sources.*	Refer to the SFI 2015-2019 Fiber Sourcing Standard Objectives 1, 2 and 5.
Hasn't this been stated within a previous PM?	Redundant?	Scrap	3	Comment misses the fact that Indicator 9.1.2 is specific to *purchased stumpage* as opposed to sourcing via a *wood producer* who is the contact with the land owner.	Refer to the SFI 2015-2019 Fiber Sourcing Standard Indicator 2.1.2.
Indicator 9.1.2. is redundant to Indicator 9.1.1. We request that this Indicator be wrapped into already present requirements for Program Participants under Indicator 9.1.1. and Performance Measure 4.2.	Redundant.		3	Comment misses the fact that Indicator 9.1.2 is specific to *purchased stumpage* as opposed to sourcing via a *wood producer* who is the contact with the land owner.	Refer to the SFI 2015-2019 Fiber Sourcing Standard Indicator 2.1.2.

Use this space to propose any removals or additions for Objective 9:

Comment	Comment Review	Rationale	Revised or Proposed New language
While we appreciate the intention of adding an objective to conserve biodiversity in fiber sourcing, the added language is not a substantive improvement for the standard because it merely references a 'program' to address biodiversity, without any auditable indicators for how such a program would influence biodiversity on those lands. Indicator should be included requiring a risk assessment to screen for controversial sources (see our expanded definition of controversial sources), along with clear, auditable language to ensure that biodiversity has been adequately considered on these fiber sourcing lands. What constitutes a rigorous and auditable 'process' or 'program' for fiber sourcing should be clearly articulated in the SFI Standard.	2	Task Group has reviewed the comment and believes the requirements for Indicator 9.1.1 are clear and auditable. Regarding the comment suggesting the need for a risk assessment that goes beyond illegal logging the Task Group is of the opinion that assessing for the risk of *illegal logging* and the use of *best management practices* by *qualified logging professionals* addresses the risk of receiving fiber from *controversial sources.*	Refer to the SFI 2015-2019 Fiber Sourcing Standard Objectives 1, 2 and 5.

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.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
Need to clarify: BMPs related to what? Some states are accepting/approving BMPs for more than water quality	Clarify that BMPs are for water quality only AND add "forestry" to BMPs OR add after BMP "water quality" OR leave it as is		2	The Task Group has reviewed the comment but notes that the term *best management practice* is a defined term and is specific to the protection of water quality.	None
A big change here is that written agreements would now be required for all purchases sourced directly from the forest with provisions requiring the use of BMP's	Though we strongly support and promote the use of BMPs, many smaller producers do not use written agreements and it would be difficult to get them to participate in SFI if they had to do so. Whereas increased participation by these smaller producers should be a goal of the program that could yield positive benefits to forest resources. The existing system that requires a system of verification of the use of BMPs should be sufficient.		2	The Task Group has reviewed the comment and while it appreciates that the requirement for a written agreement might be new for some producers the Task Group believes the requirement that enhances the credibility of the standard.	Refer to the SFI 2015-2019 Fiber Sourcing Standard Indicator 2.1.2.
clarify reference to "forestry" best management practices			2	The Task Group has reviewed the comment but notes that the term *best management practice* is a defined term and is specific to the protection of water quality.	None
best management practices to protect water quality is redundant.	BMPs are defined as protecting water quality so it is only necessary to 'use BMPs'	To broaden the practice of sustainable forestry through the use of best management practices.	2	The Task Group has reviewed the comment but is of the opinion that keeping the reference to water quality reinforces the intent of the Objective.	Refer to the SFI 2015-2019 Fiber Sourcing Standard Objective 2.
We request Performance Measure 10.2. to be revised to remove the wording "for water quality."	'Best Management Practices' are defined by SFI Inc. as directly applicable to water quality.	To broaden the practice of sustainable forestry through the use of best management practices.	2	The Task Group has reviewed the comment but is of the opinion that keeping the reference to water quality reinforces the intent of the Objective.	Refer to the SFI 2015-2019 Fiber Sourcing Standard Objective 2.

Performance Measure 10.1. *Certified 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*.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language

This performance measure is out of place with the objective – objective is water quality, measure is fiber sourcing and adherence to the principles. Move this objective.			2	The Task Group has reviewed the comment but believes that Performance Measure 10.1 should remain with this Objective.	Refer to the SFI 2015-2019 Fiber Sourcing Standard PM 2.1.

PM 10.1 Indicators:

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
1. *Program* to require that harvests of *purchased stumpage* comply with *best management practices.*					
2. Use of written agreements for the purchase of raw material sourced directly from the forest is required and must include provisions requiring the use of *best management practices.*					
10.1.2 Not sure why written agreements are required? Problematic for us.	Purchase transactions are often done over the phone and through invoicing, not formal contracts. Procurement policies already include provisions for following BMPs.	Purchase logs sourced directly from the forest must include provisions requiring the use of BMPs.	2	Task Group has reviewed the comment but notes that the commenter is interpreting the requirement for a written agreement as being the same as a contract. The written agreement can take various forms and is not specific to a contract.	Refer to the SFI 2015-2019 Fiber Sourcing Standard Indicator 2.1.2.
What about wood purchasers?	Add language "where applicable"		3	Comment not fully understood.	Refer to the SFI 2015-2019 Fiber Sourcing Standard Indicator 2.1.2.
10.1.2 – "written agreements". This is not flexible, telling entities how to do business.	Tie this to BMPs OR replace "written agreements" with "demonstrate the process".		2	Task Group has reviewed the comment but notes that the commenter is interpreting the requirement for a written agreement as being the same as a contract. The written agreement can take various forms and is not specific to a contract.	Refer to the SFI 2015-2019 Fiber Sourcing Standard PM 2.1.
How to comply – contract only? Assume previous contracts or purchase order would apply as "written agreement"	Clarify term means broader than just contract, may also be purchase orders		2	Task Group has reviewed the comment but notes that the commenter is interpreting the requirement for a written agreement as being the same as a contract. The written agreement can take various forms and is not specific to a contract.	Refer to the SFI 2015-2019 Fiber Sourcing Standard Indicator 2.1.2.
"written agreement" - Vague – between whom and about what.			2	The task group has reviewed the comment and believes the requirement is clear. These requirements are intended for implementation by the fiber sourcing organization which has signed a written agreement with the wood producer or a landowner.	Refer to the SFI 2015-2019 Fiber Sourcing Standard Indicator 2.1.2.
"directly from" - What does this mean – is it loggers, truckers, etc?			2	The task group has reviewed the comment and believes the requirement is clear. These requirements are intended for implementation by the fiber sourcing organization which has signed a written agreement with the wood producer or a landowner.	Refer to the SFI 2015-2019 Fiber Sourcing Standard Indicator 2.1.2.

Putting BMPs in written agreements raises their legal profile; if someone is not doing them there would be legal non-compliance			2	Comment is worried that non-compliance with BMPs would be equivalent to illegal logging. The Task Group does not support the contention that breach of a *best management practice* is an instance of *illegal logging* just because it has been referenced in a written agreement.	None
Any raw material purchased (e.g., minerals or gravel)?	Clarify it is raw fiber materials		2	Task Group has reviewed the comment and is of the opinion that "raw materials" is intended to be for fiber derived from trees and the practice of sustainable forestry.	None
With whom? How detailed?	Clarify it is with the "forest of origin		2	The task group has reviewed the comment and believes the requirement is clear and that the addition of "forest of origin" does not add clarity. These requirements are intended for implementation by the fiber sourcing organization which has signed a written agreement with the wood producer or a landowner.	Refer to the SFI 2015-2019 Fiber Sourcing Standard Indicator 2.1.2.
One does not buy "from the forest"; they buy from an entity. Many times the agreement is not with the forest or forest manager (not "directly with the forest").	Clarify it is purchased from the "forest of origin"		2	The task group has reviewed the comment and believes the requirement is clear and that the addition of "forest of origin" does not add clarity.	Refer to the SFI 2015-2019 Fiber Sourcing Standard Indicator 2.1.2.
Requiring written agreements is not at all reasonable for Nova Scotia and New Brunswick.	Mills rely heavily on gate wood from numerous very small producers. Having written agreements with them is not practical and would introduce huge administrative burden for Program Participants. These numerous smaller producers today are covered under our Responsible Purchase Wood Policy and that should not change.	When written agreements are used or the purchase of raw material sourced directly from the forest, they must include provisions requiring the use of best management practices.	2	Task Group has reviewed the comment but notes that the commenter is interpreting the requirement for a written agreement as being the same as a contract. The written agreement can take various forms and is not specific to a contract.	Refer to the SFI 2015-2019 Fiber Sourcing Standard Indicator 2.1.2.
3. *Program* to address adverse weather conditions.					
Need more explanation. This is proprietary information, not comfortable making the information available to producers; have never given to wood producer level.	Delete "and make them available to wood producers"		2	Task Group has reviewed the comment but does not understand which requirement it is in reference to.	None
4. *Certified Program Participants* shall clearly					
Not necessary to make this program available of how a company addresses adverse weather conditions to a wood producer. Suggest deleting the text "and make them available to wood producers"	The program is defined and written into policies of the company. The company would follow and auditor would confirm. Requiring notification to a producer of the "program" is not necessary.		2	The Task Group is of the opinion that a *certified program participant's* program to address adverse weather conditions could include communicating their adverse weather expectations to *wood producers*. The program participant is free to choose how it will structure its program.	None

Performance Measure 10.2. *Program Participant*s shall monitor the use of *best management practices*.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
To what extent?	As a program participant, I am only able to monitor the BMP activities that occur on my property; otherwise, I may be considered a trespasser.	"Program Participants shall monitor the use of best management practices." ADD: on their specific landholdings.	2	Task Group has reviewed the comment and believes that the comment misses the fact that there are other methods available or meeting this PM. Not just dependant on *Certified Program Participants* being able to directly monitor use of BMPs on small landowners' properties.	Refer to the SFI 2015-2019 Fiber Sourcing Standard PM 2.2.

PM 10.2 Indicators:

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
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*					
This is a costly endeavor if all harvest sites need to be reviewed	What is the difference to a Program participant if he monitors wood supply producers (a), or across a supply area (b)?	Seems like the (b) statement is better stated.	2	Task Group has reviewed the comment and believes that the comment misses the fact that there are other methods available or meeting this PM. Not just dependant on PP being able to directly monitor use of BMPs on small landowners' properties.	Refer to the SFI 2015-2019 Fiber Sourcing Standard PM 2.2.
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.					
Doesn't preclude "de minimus" circumstances	Add language to preclude de minimus OR clarify in Interpretations that this precludes de minimus situations		2	The Task Group has reviewed the comment and is of the opinion that the comment is making reference to *other wood suppliers* (*person or organization who infrequently supplies wood fiber on a small scale, such as farmers and small-scale land-clearing operators).* If the *certified program participants* can monitor harvesting from these de minimis sources then they can use this information in the verifiable monitoring system. However, the Indicator does not require this level of monitoring.	Refer to the SFI 2015-2019 Fiber Sourcing Standard Indicator 2.2.2.
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	Different additions or changes could be considered, such as "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	The Task Group has reviewed the comment and is of the opinion that the commenter misses the intent behind the existing Indicator – that information from the VMS is to be used to reinforce benefits of BMP use within the wood producer / land owner community. Logger training	Refer to the SFI 2015-2019 Fiber Sourcing Standard Indicator 2.2.2.

	fostering improvement. And as this is already occurring, either formally or informally, it should be recognized in the Indicator			venues are one of the feedback loops used.	

Use this space to propose any removals or additions for Objective 10:

Comment	Comment Review	Rationale	Revised or Proposed New language
Addresses the concern and is practical as written. This should objective should be a model for all the other objectives in how these standards should be written.	3	Comment is supportive of proposed draft language.	Refer to the SFI 2015-2019 Fiber Sourcing Standard Objective 1.

Objective 11. 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	Comment Review	Rationale	Revised or Proposed New language
SFI should find a way in this objective and other places in the Standard to give additional recognition and incentive for the use of CLPs and for the fiber that they harvest from all lands, specifically non-certified SMALL private lands (<100 / 50 acres).	If SFI does not find a way to provide additional recognition and support for CLP programs, these are likely to die out due to lack of marketplace recognition and incentive. These programs have valid benefits on the resource and SFI could develop a framework to provide some sort of recognition.	Work with credible CLP programs and fiber sourcing companies to develop a framework for added recognition.	2	Comment is looking for SFI Inc. / SFI program to develop additional incentives for a small, non-certified landowner to select a Certified Logging Professional. Selection of CLP vs. QLP has been is a voluntary choice and draft language for Objective 11 has it remaining this way. The Task Group is of the opinion that the case for *certified logging professionals* must be made by respective *SFI Implementation Committees* and not something that the SFI program can drive. SFI cannot incent the use of CLPs over QLP as this is an individual business decision made by the program participant.	Refer to the SFI 2015-2019 Forest Management Standard PM 11.1 and SFI 2015-2019 Fiber Sourcing Standard PM 3.1.

No change was made to accommodate/incorporate comments previously sent by MNDNR Neither this PM nor any other part of the SFI Standard provides an incentive to maintain Certified Logging Professional programs nor does the standard provide added recognition of the benefits provided by certified logging programs.		SFI should more clearly define and create incentive for CLP OR delete the term and associated requirements and rely on QLP to deliver sustainable harvests.	2	Comment is looking for SFI Inc. / SFI program to develop additional incentives for a small, non-certified landowner to select a Certified Logging Professional. Selection of CLP vs. QLP has been is a voluntary choice and draft language for Objective 11 has it remaining this way. The Task Group is of the opinion that the case for *certified logging professionals* must be made by respective *SFI Implementation Committees* and not something that the SFI program can drive. SFI cannot incent the use of CLPs over QLP as this is an individual business decision made by the program participant.	Refer to the SFI 2015-2019 Forest Management Standard PM 11.2 and SFI 2015-2019 Fiber Sourcing Standard PM 6.2.
PM 11.1.2 and 17.1.5 both reference "qualified logging professionals". The current definition of "qualified logging professional" has been changed to require that a crew be under the direction of a qualified logging professional that is on-site. The on-site requirement is an extra burden on logging crews. Recommend that the on-site requirement be removed.			2	The Task Group has reviewed the comment and believes the revised definition of *qualified logging professional* addresses the comment.	Refer to Section 13 – Definition.

PM 11.1 Indicators:

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
1. *Program* to promote the use of *certified logging professional* (where available), *qualified resource professionals* and *qualified logging professionals.*					
		licensed and/or certified foresters	2	The Task Group has reviewed the comment proposing the addition of licensed / certified foresters to Indicator 11.1.1. The Task Group is of the opinion that the existing term *qualified resource professional* addresses the comment.	None
We have to allow landowners who are not certified loggers to harvest their trees and sell products to SFI sources.			2	Task Group believes the scenario referenced in the comment would be addressed by the definition of *other wood producers - (person or organization who infrequently supplies wood fiber on a small scale, such as farmers and small-scale land-clearing operators).*	None
important to retain "where available" as 11.1.1 is not a requirement to use certified loggers.			3	Comment in supportive of retaining the existing language.	None
The language is confusing and many have not understood that the use of CLPs (where available) is NOT a requirement. Somehow SFI needs to	The language is confusing and many have not understood that the use of CLPs (where available)	Clarify intent for this to be an option to use either.	2	The Task Group has reviewed the comment and is of the opinion that	Refer to the SFI 2015-2019 Forest Management Standard PM 11.1 and SFI

clarify that the intent is to provide an option to use CLPs or QLPs ... even in the cases where CLPs exist.	is NOT a requirement. Somehow SFI needs to clarify that the intent is to provide an option to use CLPs or QLPs ... even in the cases where CLPs exist.			Indicator 11.1.1 language is clear that use of either CLP or QLP is the intent and that there is no expectation that CLP shall be used where both options exist.	2015-2019 Fiber Sourcing Standard PM 6.1.
2. List of *certified logging professionals* and *qualified logging professionals* maintained by					

Objective 12. 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	Comment Review	Rationale	Revised or Proposed New language
No one understands these concepts	No one knows how to comply with this statement	Define the terms within the statement, or Scrap	3	Task Group disagrees with the comment – the terms in Objective are defined in Section 13 - Definitions.	None
for Objective 12, the requirement is that the "fiber sourcing programs support the principles of sustainable forestry , including efforts to promote conservation of biological diversity", but again, little definition as to how this would result in biodiversity conservation. Species at Risk also need to be applied in Objective 12 "Promote Conservation of Biological Diversity, Biodiversity Hotspots and High-Biodiversity Wilderness Areas" since logging in places like Asia is having a significant impact on intact carbon rich forest areas as well as the species that depend on those forest areas. Allowing any fiber from these regions into the SFI system further weakens any attempts by SFI to manage or impact meaningful sustainable forestry anywhere in the world.			2	Task Group has reviewed this comment and believe it is addressed wit heh revised language in the SFI Fiber Sourcing Standard PM 11.1	Refer to SFI 2015-2019 Fiber Sourcing Standard PM 11.1.

Performance Measure 12.1. *Program Participants* shall ensure that their *fiber sourcing programs* support the *principles of sustainable forestry*, including efforts to promote *conservation* of *biological diversity*.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
Is this a repeat of a previous PM?	Redundant statement	Scrap	3	Comment misses the fact that this Objective is for sourcing from outside the United States and Canada.	None

PM 12.1 Indicators:

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
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 World Resources Institute, the *Alliance for Zero Extinction*, World					
What must be accomplished?	Clearly state what needs to be done for accomplishment to be considered?	Rewrite to a more definitive statement or Scrap.	3	The Task Group has reviewed the comment but is not aware that	None

				demonstrating conformance to these requirements has been an issue to date.	

2. *Program* with *direct suppliers* to promote the *principles*

Use this space to propose any removals or additions for Objective 12:

Comment	Comment Review	Rationale	Revised or Proposed New language
drop reference to "high biodiversity wilderness areas". If they are designated as wilderness they are already protected,	3	Comment misunderstands that Objective is for "off-shore" sourcing and not for fiber sourced from the United States and Canada.	Refer to SFI 2015-2019 Fiber Sourcing Standard Objective 11.

Objective 13. Avoidance of Controversial Sources including Illegal Logging. To broaden the practice of *sustainable forestry* by avoidance of *illegal logging*.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
Vague whether this is for accidental illegal logging	Revise language to clarify the objective is intended for intentional illegal logging		2	The Task Group has reviewed the comment and is of the opinion that the comment is addressed with the revised definition of *illegal logging* and accompanying guidance.	Refer to Section 6 – Guidance and Section 13 – Definitions.
We have suggested that the definition of illegal logging be removed and replaced with a definition of illegal timber (refer to comments in Definitions section). This change will require modifications to Objective 13 to ensure consistency throughout the standard.	To ensure the standard language is consistent with other changes we are suggesting.	Objective 13. Avoidance of Controversial Sources including Illegal Timber. To broaden the practice of sustainable forestry by avoidance of illegal timber.	2	The Task Group has reviewed the comment and believes that the revised definition of illegal logging addresses the comment.	Refer to Section 13 – Definition.
Move Indicators 15.1.4 & 15.1.5 to this objective ... as those relate mostly to Fiber Sourcing program participants.	Move Indicators 15.1.4 & 15.1.5 to this objective ... as those relate mostly to Fiber Sourcing program participants.	Move Indicators 15.1.4 & 15.1.5 to this objective ... as those relate mostly to Fiber Sourcing program participants.	2	Task Group has reviewed the comment and believes that the commenter misunderstands that this objective is for "off-shore" fiber sourcing whereas Objective 15 is directed to all certified program participants and not just those sourcing fiber from "off-shore".	None
Is this applicable in the US where we have laws to protect us?	Not relevant to the US	ADD: "by avoidance of illegal logging, outside the US"	2	Task Group has reviewed the comment and notes that the commenter misunderstands that this objective is for "off-shore" fiber sourcing.	None

SF/ is not consistent with legal requirements to avoid Controversial Sources including Illegal Logging. The language needs to improve to 'prohibit' certification and sourcing from illegal and controversial sources globally (not simply avoid them). The language also needs to include specifics on the process of how to identify these areas and state compliance with the Lacey Act and the EU Timber Regulations. Again, the measures suggest programs are developed, rather than requirements on what is permitted and what isn't.			2	The Task Group has reviewed the comment and has the following response. The Task Group use of the word "Avoid" in in recognition of the fact that a company cannot know with absolute certainly that there is no controversial and or illegal fiber in the fiber sourced from outside US or Canada. The requirement is that the program participant has a process for assessing the risk of sourcing from regions where there is a risk of illegal and or controversial supply. A PP cannot knowingly include illegal or controversial supply in its SFI supply stream. This requirement aligns with the SFI Policy on Illegal Logging.	Refer to SFI 2015-2019 Fiber Sourcing Standard PM 12.1

Performance Measure 13.1. *Certified Program Participants* shall ensure that their *fiber sourcing programs* support the *principles* of *sustainable forestry*, including efforts to reduce the risk of *illegal logging*.(Note: additional guidance is included in Section 7 *SFI Legality Requirements and Policies for Avoidance of Illegal Logging*.)

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
We have suggested that the definition of illegal logging be removed and replaced with a definition of illegal timber (refer to comments in Definitions section). This change will require modifications to Objective 13 to ensure consistency throughout the standard.	To ensure the standard language is consistent with other changes we are suggesting.	Performance Measure 13.1. Certified Program Participants shall ensure that their fiber sourcing programs support the principles of sustainable forestry, including efforts to reduce the risk of sourcing illegal timber. (Note: additional guidance is included in Section 7 SFI Legality Requirements and Policies for Avoidance of Illegal Timber)	2	The Task Group has reviewed the comment and believes that the revised definition of illegal logging addresses the comment.	Refer to Section 13 – Definition.
Is this applicable in the US where we have laws to protect us?	Not relevant to the US	ADD: "by avoidance of illegal logging, outside the US"	2	Task Group has reviewed the comment and notes that the commenter misunderstands that this objective is for "off-shore" fiber sourcing.	None

PM 13.1 Indicators:

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
1. Process to assess the risk that the *Certified Program Participant's fiber sourcing program* could acquire material from *illegal logging* such as consulting information from the World Resources Institute Risk Information Tool, the World Bank, or Transparency International.					
We have suggested that the definition of illegal logging be removed and replaced with a definition of illegal timber (refer to comments in Definitions section). This change will require modifications to Objective 13 to ensure consistency throughout the standard.	To ensure the standard language is consistent with other changes we are suggesting.	1. Process to assess the risk that the Certified Program Participant's fiber sourcing program could acquire illegal timber such as consulting information from the World Resources Institute Risk Information Tool, the World Bank, or Transparency International.	2	The Task Group has reviewed the comment and believes that the revised definition of illegal logging addresses the comment.	Refer to Section 13 – Definition.

We note that the current SFI standard revision encourages the use of tools such as WRI's Risk Information tool, World Bank and Transparency International. We would additionally suggest mentioning the NEPCon Global Forest Risk Registry and the WWF/GFTN-TRAFFIC Common Legality Framework. We also suggest listing these resources in the SFI Section 6 Guidance document.		Risk assessment to ensure that the Certified Program Participant's fiber sourcing program does not acquire material from illegal logging, which may include consulting information from the World Resources Institute Risk Information Tool, the World Bank, Transparency International, the NEPCon Global Forest Risk Registry and the WWF/GFTN-TRAFFIC Common Legality Framework.	2	The Task Group has reviewed the comment. The list of organizations/tools referenced is not meant to be absolute but is there as examples.	Refer to SFI 2015-2019 Fiber Sourcing Standard PM 12.1.
Current assessments shows the risk in the S.E. US to be very low.	Now that the assessment has been made, what would change that outcome in the US	Scrap	2	Task Group has reviewed the comment and is of the option that the comment misunderstands that this Objective is for off-shore fiber sourcing.	None
2. *Program* to address any significant risk identified under 13.1.1.					
Same comment as #1 above	Same comment as #1 above	Scrap	2	Task Group has reviewed the comment and is of the option that the comment misunderstands that this Objective is for off-shore fiber sourcing.	None
3. *Program* with *direct suppliers* to promote the principles of *sustainable forestry*.					
4. Documented information that includes knowledge about *direct suppliers'* application of the *principles* of *sustainable forestry*.					

Use this space to propose any removals or additions for Objective 13:

Comment	Comment Review	Rationale	Revised or Proposed New language
We note that the current SFI standard revision encourages the use of tools such as WRI's Risk Information tool, World Bank and Transparency International. We would additionally suggest mentioning the NEPCon Global Forest Risk Registry and the WWF/GFTN-TRAFFIC Common Legality Framework. We also suggest listing these resources in the SFI Section 6 Guidance document. More information about these tools are here: http://www.globalforestregistry.org/ http://gftn.panda.org/?202483/Framework-for-Assessing-Legality-of-Forestry-Operations-Timber-Processing-and-Trade	2	The Task Group has reviewed the comment. The list of organizations/tools referenced is not meant to be absolute but is there as examples.	Refer to SFI 2015-2019 Fiber Sourcing Standard PM 12.1.

Objective 14. Avoidance of Controversial Sources including Fiber Sourced from Areas Without Effective Social Laws. To broaden the practice of *sustainable forestry* by avoiding controversial sources.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
Not relevant in the US	Lacks relevance within the US	Name the countries that do not have adequate laws and where concerns should exist .	2	Task Group has reviewed the comment but is of the opinion that each Certified Program Participant needs to evaluate its own sources of supply to determine its specific risk of sourcing from countries / regions without effective social laws.	Refer to SFI 2015-2019 Fiber Sourcing Standard Objective 13.

Performance Measure 14.1. *Certified Program Participant*s shall avoid *controversial sources* and encourage socially sound practices.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
Describe a "socially sound practice"	It is impossible to encourage a practice that is not understood	Name the "socially sound practices" or Scrap	2	The Task Group has reviewed the comment and notes that the "socially sound practices" referenced in the comment are given in Indicator 14.1.1.	Refer to SFI 2015-2019 Fiber Sourcing Standard PM 13.1.

PM 14.1 Indicators:

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
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.					
These are all present within the US	Not relevant within the US	ADD the following: "outside of the US".	2	Task Group has reviewed the comment and notes that the commenter misunderstands that these requirements are for SFI Program Participants sourcing from outside the United States and Canada.	Refer to SFI 2015-2019 Fiber Sourcing Standard PM 13.1.
Same comments as #1 above	Same comment as #1 above	Scrap	2	Task Group has reviewed the comment and notes that the commenter misunderstands that these requirements are for SFI Program Participants sourcing from outside the United States and Canada.	Refer to SFI 2015-2019 Fiber Sourcing Standard PM 13.1.

Objective 15. Legal and Regulatory Compliance

Objective 15. Legal and Regulatory Compliance. Compliance with applicable federal, provincial, state and local laws and regulations.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language

Most government agencies are regulatory, they guard against illegal logging. This requirement seems unnecessary for those agencies for which it is their job.			2	Task Group has reviewed the comment and is of the opinion that Program Participants have a key role to play in safe-guarding against illegal logging – it is not just the role of government agencies.	Refer to the SFI 2015-2019 Forest Management Standard Objective 9 and SFI 2015-2019 Fiber Sourcing Standard Objective 4.
There is new language here requiring participants to assess their risk of being involved in illegal harvesting and have programs to address significant risk	This may help acceptance of SFI "Fiber Sourcing" Certification in situations such as the UK Timber Procurement Policy that is currently of concern to some producers. We are supportive, but may want to clarify that it is applicable to fiber sourcing and not so much land management certification…	also under 15.1.4 add dealers to item (a) and add a new item (e) that references company, or consultant-based, risk assessments.	2	Comment to be addressed under Ind. 15.1.4.	Refer to the SFI 2015-2019 Fiber Sourcing Standard Indicator 4.1.4.
Move Indicators 15.1.4 & 15.1.5 to objective 13 ... as these relate mostly to Fiber Sourcing program participants and not forest land managers.	Move Indicators 15.1.4 & 15.1.5 to objective 13 ... as these relate mostly to Fiber Sourcing program participants and not forest land managers.	Move Indicators 15.1.4 & 15.1.5 to objective 13 ... as these relate mostly to Fiber Sourcing program participants and not forest land managers.	2	Task Group has reviewed the comment and is considering moving these requirements into the Fiber Sourcing Objectives.	Refer to the SFI 2015-2019 Fiber Sourcing Standard PM 4.1.
Do you mean as they pertain to forestry practices?		ADD the following: "as these pertain to forestry practices" or Scrap	2	Task Group has reviewed the comment but is of the opinion that the existing language for the Objective continues to be effective. Note that compliance is not restricted to just "forestry practices".	Refer to the SFI 2015-2019 Forest Management Standard PM Objective 9 and SFI 2015-2019 Fiber Sourcing Standard Objective 4.

Performance Measure 15.1. *Certified Program Participants* shall take appropriate steps to avoid illegally harvested wood and to comply with applicable federal, provincial, state and local *forestry* and related social and environmental laws and regulations.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
We have suggested that the definition of illegal logging be removed and replaced with a definition of illegal timber (refer to comments in Definitions section). This change will require modifications to Objective 15 to ensure consistency throughout the standard.	To ensure the standard language is consistent with other changes we are suggesting.	Performance Measure 15.1. Certified Program Participants shall take appropriate steps to avoid illegal timber and to comply with the applicable federal, provincial, state and local forestry and related social and environmental laws and regulations.	2	Task Group has reviewed the comment and considered the proposed new definition of illegal timber. The Task Group has developed a new definition of *illegal logging* which is believes addresses the intent of the comment.	Refer to Section 13 – Definition
supportive of additional language to clarify the legal and social requirements of state, federal and local levels are being met			3	Comment is supportive of revised Performance Measure	Refer to the SFI 2015-2019 Forest Management Standard PMs 9.1 and 9.2 and the SFI 2015-2019 Fiber Sourcing Standard PMs 4.1 and 4.2.

The portion of this PM related to avoiding illegally harvested wood should not apply to organizations that do not have a fiber sourcing program.		Suggest separating the matter of complying with laws and regulations from the issue of avoiding illegally harvested wood. The former would apply to all, the latter only to those with fiber sourcing programs.	2	The Task Group has reviewed the comment but is of the opinion that illegal logging is integral to compliance with legal and regulatory requirements. Avoidance of illegal logging is the responsibility of both program participants the procure fiber as well as forest land owners and forest land managers.	Refer to the SFI 2015-2019 Fiber Sourcing Standard PMs 4.1.
This has been previously stated, at least once: "Certified Program Participants shall take appropriate steps to avoid illegally harvested wood"	Repetitive	Scrap	2	Task Group has reviewed the comment and believes the revised Performance Measure 15.1 addresses the intent of the comment.	Refer to the SFI 2015-2019 Fiber Sourcing Standard PM 4.1.

PM 15.1 Indicators:

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
1. Access to relevant laws and regulations in appropriate locations.					
This seems to be missing the responsibility to report illegal logging – intentional or missing?	Either recognize that this may be noted as missing, or require reporting to a central place (government)		2	Task Group has reviewed the comment but believes that the comment is addressed by PM 15.1 requirement to "take appropriate steps to avoid illegal logging".	Refer to the SFI 2015-2019 Forest Management Standard PM 9.1 and the SFI 2015-2019 Fiber Sourcing Standard PM 4.1.
As written, it is not applicable to public land managers or private landowners.	Add "harvesting and" before "harvested"		2	Task Group disagrees with the comment – requirement of Indicator 15.1.1 is applicable to all SFI Section 2 certificate holders.	Refer to the SFI 2015-2019 Forest Management Standard PM 9.1 and the SFI 2015-2019 Fiber Sourcing Standard PM 4.1.
2. System to achieve compliance with applicable federal, provincial, state or local laws and regulations. **3. Demonstration of commitment to legal compliance through *available regulatory action information*.** **4. Process to assess the risk that the *Certified Program Participants* fiber sourcing program could acquire material from illegal logging by considering some of the following:** **a. communications with suppliers** **b. independent research** **c. contract documentation** **d. maintain records**					
15.1.4 and 15.1.5 - Duplicative.	Combine .4 and .5 to read "assess and address".		2	Task Group has reviewed the comment and is considering moving these requirements into the Fiber Sourcing Objectives. However, the Task Group believes the draft indicators should remain as separate requirements.	Refer to the SFI 2015-2019 Fiber Sourcing Standard PM 4.1.
Does Indicator 15.1.4 apply to landowners as well or just procurement? Clarify			2	Task Group has reviewed the comment and is considering moving these	Refer to the SFI 2015-2019 Fiber Sourcing Standard PM 4.1.

				requirements into the Fiber Sourcing Objectives.	
15.1.4 b. Tool – what is it? Need to better understand what the tool or research is.			3	General comment – not clear where the reference to "tool" comes from?	None
15.1.4 & 15.1.5 Not appropriate for forest managers	Move back to fiber sourcing section OR could leave it since it does state "fiber sourcing", but state more clearly that these are only for sourcing		2	Task Group has reviewed the comment and is considering moving these requirements into the Fiber Sourcing Objectives.	Refer to the SFI 2015-2019 Fiber Sourcing Standard PM 4.1.
15.1.4.a – "suppliers". "Supplier" isn't defined to be different that wood producers.	Remove "suppliers", use "wood producer" instead - throughout the document OR define "suppliers"		2	Task Group has reviewed the comment but is of the opinion that the term "supplier" covers *wood producers* and *other wood suppliers*.	Refer to the SFI 2015-2019 Fiber Sourcing Standard PM 4.1.
15.1.4.d - "records" what kind? Need clarification: What kind of records? Records related to what? Be more specific as to which records.			2	Task Group believes the requirements of Indicator 15.1.4 are clear and that examples of "records" do not need to be defined.	Refer to the SFI 2015-2019 Fiber Sourcing Standard PM 4.1.
Mention PEFC Chain of Custody or generally CoCs and "risk assessments" demonstrate compliance and add "but not limited to"			2	Task Group does not believe it is appropriate to point to specific examples of a program / processes for assessing risk.	None
This is unclear.	Use similar risk assessment concepts from PEFC; consolidate under a risk 613assessment format		2	Task Group does not believe it is appropriate to point to specific examples of a programs / processes for assessing risk.	None
Does this apply to forest managers? This would be different for private and public land managers	Clarify which portions apply to land managers and which apply to fiber sourcing and which apply to both		2	Task Group has reviewed the comment and is considering moving these requirements into the Fiber Sourcing Objectives.	Refer to the SFI 2015-2019 Fiber Sourcing Standard PM 4.1.
This requirement seems be vague and may be difficult to be audited. While I do not suggest more rigorous indicators, the current strong legal framework in the US and Canada should be recognized. Further assessments of sourcing from illegal harvests should not be required by program participants. Information from public reports on illegal logging may be beneficial but also may be biased according to various interests.		Eliminate this Indicator.	2	Task Group has reviewed the comment but is of the opinion that this indicator is appropriate and auditable. However, Task Group is considering moving these requirements into the Fiber Sourcing Objectives.	Refer to the SFI 2015-2019 Fiber Sourcing Standard PM 4.1.
Indicators 4 and 5 only applicable to fiber sourcing	Our organization does not purchase fiber	Add "where applicable" to indicators 4 and 5	2	Task Group does not believe it is appropriate to point to specific examples of a programs / processes for assessing risk.	None
The assumption here is that this is out of scope for those that only own land and produce fibre from it.			2	Task Group does not believe it is appropriate to point to specific examples of a programs / processes for assessing risk.	None
We have suggested that the definition of illegal logging be removed and replaced with a definition of illegal timber (refer to comments in Definitions section). This change will require modifications to Objective 15 to ensure consistency throughout the standard.	To ensure the standard language is consistent with other changes we are suggesting.	4. Process to assess the risk that the Certified Program Participants fiber sourcing program could acquire illegal timber by considering some of the following: a. Communications with suppliers b. Independent research c. Contract documentation d. Maintain records	2	Task Group has reviewed the comment and considered the proposed new definition of illegal timber. The Task Group has developed a new definition of *illegal logging* which is believes addresses the intent of the comment.	Refer to Section 13 – Definition
	see above	also under 15.1.4 add dealers to item (a) and add a new item (e) that references company, or consultant-based.	2	Task Group does not believe it is appropriate to point to specific examples	None

		risk assessments.		of a programs / processes for assessing risk.	
communication with "suppliers" should be changed to "wood producers. Supportive of language which notes and clarifies the "process to assess" risk for illegal logging Maintain records might be clarified to include chain of custody documentation. or risk assessments	definitions is for wood producers not suppliers		2	Task Group has reviewed the comment but is of the opinion that the term "supplier" covers *wood producers* and *other wood suppliers*.	Refer to the SFI 2015-2019 Fiber Sourcing Standard PM 4.1.
Not applicable to forest land managers. This was likely moved in the effort to combine two similar Objectives, one of which was previously under the Fiber Sourcing section. While it is appropriate to look at reducing overlap, this indicator is confusing and not applicable to forest management. Keeping it here will add confusion for program participants and auditors.	Forest land managers should not need to conduct a "risk assessment" for activities that are not under their control. Forest managers do not "source fiber or acquire material from illegal logging."	Move to Objective 13.	2	Task Group has reviewed the comment and is considering moving these requirements into the Fiber Sourcing Objectives.	Refer to the SFI 2015-2019 Fiber Sourcing Standard PM 4.1.
Delete paragraph 4 (b)	We question whether (b) "independent research" can be effectively used to assess the risk of illegally harvested wood.	Delete paragraph 4 (b)	2	Task Group believes that Indicator 15.1.4 (b) is an effective requirement allowing Program Participants to use regionally applicable research to implement their program to assess risk.	Refer to the SFI 2015-2019 Fiber Sourcing Standard PM 4.1.
This should not apply to organizations that do not have a fiber sourceing program.			2	Task Group has reviewed the comment and is considering moving these requirements into the Fiber Sourcing Objectives.	Refer to the SFI 2015-2019 Fiber Sourcing Standard PM 4.1.
Indicator 15.1.4 also promises to assuage concerns about the sourcing of material through illegal logging by helping track material through the supply chain. Use of internal risk assessment or evaluation procedures can also help safeguard against the purchase of illegally sourced material, and could be added to the list of considerations in 15.1.4.			2	Comment is supportive of draft language.	Refer to the SFI 2015-2019 Fiber Sourcing Standard PM 4.1.
PM 15.1.4 The term "supplier" is not defined and may mean different things to different people. Either define "supplier" in Section 13, or change to "wood producer" in this section.	Term is not defined which can lead to misinterpretation.	Either define "supplier" in Section 13, or change to "wood producer" in this section.	2	Task Group has reviewed the comment but is of the opinion that the term "supplier" covers *wood producers* and *other wood suppliers*.	Refer to the SFI 2015-2019 Fiber Sourcing Standard PM 4.1.
5. Program to address any significant risk identified under 15.1.4					
OR define risk assessment			3	General comment.	None
Remove. We don't need a program to address significant risk. Duplication.	Procurement policies already include a statement to not purchase wood from illegal logging.		2	Task Group has reviewed the comment and is considering moving these requirements into the Fiber Sourcing Objectives. However, the Task Group believes the draft indicators 15.1.4 and 15.1.5 should remain as separate requirements.	Refer to the SFI 2015-2019 Fiber Sourcing Standard PM 4.1.
Indicators 4 and 5 only applicable to fiber sourcing	Our organization does not purchase fiber	Add "where applicable" to indicators 4 and 5	2	Task Group has reviewed the comment and is considering moving these requirements into the Fiber Sourcing Objectives.	Refer to the SFI 2015-2019 Fiber Sourcing Standard PM 4.1.
supportive of risk based assessment and identify a program if risk is found.			3	Comment is supportive of the requirement.	None
If Indicator 15.1.4 is moved to Objective 13 (see earlier comments), this Indicator should be moved as well. Not applicable to forest management	If Indicator 15.1.4 is moved to Objective 13 (see earlier comments), this Indicator should be	Move to objective 13	2	Task Group has reviewed the comment and is considering moving these	Refer to the SFI 2015-2019 Fiber Sourcing Standard PM 4.1.

operations.	moved as well. Not applicable to forest management operations.			requirements into the Fiber Sourcing Objectives.	
This should not apply to organizations that do not have a fiber sourceing program.			2	Task Group has reviewed the comment and is considering moving these requirements into the Fiber Sourcing Objectives.	Refer to the SFI 2015-2019 Fiber Sourcing Standard PM 4.1.

Performance Measure 15.2. *Certified Program Participant*s shall take appropriate steps to comply with all applicable social laws at the federal, provincial, state and local levels in the country in which the *Certified Program Participant* operates.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
Delete PM 15.2	PM 15.2 is redundant of PM 15.1 and 15.1 & 15.2 could easily be combined.	Move existing indicators 15.2.1 & 15.2.2 under PM 15.1.	2	Task Group has reviewed the comment but believes that the Indicator continues to be an effective requirement.	Refer to the SFI 2015-2019 Fiber Sourcing Standard PM 4.2.
Delete PM.	Redundant with 15.1.	Delete PM. move indicators from PM15.2 under 15.1.	2	Task Group has reviewed the comment but believes that the Indicator continues to be an effective requirement.	Refer to the SFI 2015-2019 Fiber Sourcing Standard PM 4.2.
supportive of being specific to requirement of federal, state, local "social" laws.			3	Comment is supportive of the existing requirement.	Refer to the SFI 2015-2019 Fiber Sourcing Standard PM 4.2.

PM 15.2 Indicator:

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
1. Written *policy* 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.					
Decoupling – why ask for a written policy demonstrating commitment to comply with social laws? Because in 15.1: need to be in compliance with laws and regulations. Not clear and could be an issue in terms of interpretation by a variety of different groups.			2	Task Group has reviewed the comment. The existing requirement for a policy demonstrating commitment of "social laws" is a means of communicating this commitment to program participant employees as well as external parties.	Refer to the SFI 2015-2019 Fiber Sourcing Standard Indicator 4.2.1.
Move under PM 15.1	Combine PM 15.1 & 15.2	Move existing indicators 15.2.1 under PM 15.1.	2	Task Group has reviewed the comment but believes that is PM 15.1 and PM 15.2 focus on different albeit it related requirements. Therefore the Task Group is of the opinion that the requirements of the two Performance Measures	Refer to the SFI 2015-2019 Fiber Sourcing Standard PMs 4.1 & 4.2.

				should remain separate.	
It is not necessary to require a "written policy demonstrating a commitment to comply with social laws," if the SFI Standard already requires a demonstration of compliance under P.M 15.1 Indicators 1, 2 and 3.	This PM is already asking us to show compliance to laws and regs, so why draw special attention to the social piece.	Strike 15.2.1 from the proposed standard.	2	Task Group has reviewed the comment. The existing requirement for a policy demonstrating commitment of "social laws" is a means of communicating this commitment to program participant employees as well as external parties.	Refer to the SFI 2015-2019 Fiber Sourcing Standard Indicator 4.2.1.
Delete PM. move indicators under PM 15.1.	Redundant	Delete PM. move indicators under PM 15.1.	2	Task Group has reviewed the comment but believes that is PM 15.1 and PM 15.2 focus on different albeit it related requirements. Therefore the Task Group is of the opinion that the requirements of the two Performance Measures should remain separate.	Refer to the SFI 2015-2019 Fiber Sourcing Standard PMs 4.1 & 4.2.
2. *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.					
Move under PM 15.1	Combine PM 15.1 & 15.2	Move existing indicators 15.2.2 under PM 15.1.	2	Task Group has reviewed the comment but believes that is PM 15.1 and PM 15.2 focus on different albeit it related requirements. Therefore the Task Group is of the opinion that the requirements of the two Performance Measures should remain separate.	Refer to the SFI 2015-2019 Fiber Sourcing Standard PMs 4.1 & 4.2.
Delete PM. move indicators under PM 15.1.	Redundant	Delete PM. move indicators under PM 15.1.	2	Task Group has reviewed the comment but believes that is PM 15.1 and PM 15.2 focus on different albeit it related requirements. Therefore the Task Group is of the opinion that the requirements of the two Performance Measures should remain separate.	Refer to the SFI 2015-2019 Fiber Sourcing Standard PMs 4.1 & 4.2.
Some states are right to work states and may not conform with ILO.			3	General comment.	None

Use this space to propose any removals or additions for Objective 15:

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
Delete PM 15.2 and move the 2 indicators from PM15.2 under 15.1 - to make less redundant.			2	8	Refer to the SFI 2015-2019 Fiber Sourcing Standard PMs 4.1 & 4.2.

Objective 16. *Forestry* Research, Science, and Technology

Objective 16. *Forestry* Research, Science, and Technology. To support *forestry* research, science, and technology, upon which sustainable forest management decisions are based.

Performance Measure 16.1. *Certified Program Participants* shall individually and/or through cooperative efforts involving *SFI Implementation Committees*, associations or other partners provide in-kind support or funding for forest research to improve *forest health*, *productivity*, and sustainable management of forest resources, and the environmental benefits and performance of forest products.

PM 16.1 Indicators:

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
1. Financial or in-kind support of research to address questions of relevance in the region of operations **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. reduction of catastrophic wildfire** **i. social issues;** **j. forest operations efficiencies and economics;** **k. energy efficiency;** **l. life cycle assessment;** **m. avoidance of *illegal logging*; and** **n. avoidance of *controversial* sources.**					
The scope of eligible research should also include research in mill technology advances and new product development diversification.	Both of these research areas can increase the benefits yielded by every log currently harvested and is more meaningful to program participants that engage only in manufacturing and not managing any forest lands. These research areas are also comparable to j. forest operations and efficiencies and k. energy efficiency	Add: o. mill technology advancements p. new product development and diversification	2	Task Group has reviewed the comment and is of the opinion that the proposed language in Indicator 16.1.1 does not preclude the example of mill technology as a form of research. The draft Indicator 16.1.1 is the written so that the list is illustrative and not prescriptive.	Refer to Ind. 16.1.1. Refer to the SFI 2015-2019 Forest Management Standard Indicator 10.1.1 and the SFI 2015-2019 Fiber Sourcing Standard Indicator 5.1.1.
Good addition of h) reduction in catastrophic wildfire.	Good addition of h) reduction in catastrophic wildfire.	NA	3	Comment is supportive of draft language.	None
2. Research on genetically engineered trees via *forest tree biotechnology* shall adhere to all applicable federal, state, and provincial regulations and international protocols ratified by the US and/or Canada depending on jurisdiction of management.					
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 has reviewed the comment and concurs with the proposed revision. Comment is addressed by the revised Indicator 16.1.2.	Refer to Ind. 16.1.1. Refer to the SFI 2015-2019 Forest Management Standard Indicator 10.1.2 and the SFI 2015-2019 Fiber Sourcing Standard Indicator 5.1.2.

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 midified, in the Responsible Use: Biotech Tree Principles; available at: www.responsibleuse.org	2	Task Group has reviewed the comment but is of the opinion that the revised Indicator 16.1.2 along with the *SFI Forest Tree Biotechnology Policy* is sufficient to address the current issues related to research on genetically engineered trees. However, should SFI decide to take a position on the use of "GMOs" beyond research, the Task Group recommend that the Responsible Use principles be reviewed for possible inclusion in the Standard.	Refer to the SFI 2015-2019 Forest Management Standard Indicator 10.1.2 and the SFI 2015-2019 Fiber Sourcing Standard Indicator 5.1.2. and Section 7 – SFI Policies.
GMOs and Biotechnology Prohibit, not 'minimize' the use of 'exotics' and Genetically Modified Organism' s (Performance Measure 2.4), and stop funding research on genetically engineered trees (Objective 16 #2).			2	Task Group has reviewed the comment. The Task Group would direct the commenter to the SFI Policy on Forest Tree Biotechnology (Dec 2013). GMO derived materials are not allowed in a company's SFI certified supply stream.	Refer to the SFI 2015-2019 Forest Management Standard Indicator 10.1.2 and the SFI 2015-2019 Fiber Sourcing Standard Indicator 5.1.2 and Section 7 – SFI Policies.

Performance Measure 16.2. *Certified Program Participants* shall individually and/or through cooperative efforts involving *SFI Implementation Committees*, associations or other partners develop or use state, provincial or regional analyses in support of their *sustainable forestry programs*.

PM 16.2 Indicator:

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
1. Participation, individually and/or through cooperative efforts involving *SFI Implementation Committees* and/or associations at the national, state, 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 practices* implementation and conformance;** **d. *biodiversity conservation* information for family forest owners; and** **e. social, cultural or economic benefit assessments.**					
drain a mistake?	drain replaced with yield	b. growth and yield assessments	2	Task Group has reviewed the comment and believes the existing language is the most appropriate.	Refer to the SFI 2015-2019 Forest Management Standard Indicator 10.2.1 and the SFI 2015-2019 Fiber Sourcing Standard Indicator 5.2.1.

Performance Measure 16.3. *Certified Program Participant*s shall individually and/or through cooperative efforts involving *SFI Implementation Committees*, associations or other partners broaden the awareness of climate change impacts on forests, *wildlife* and *biological diversity*.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
Could go further - Articulate the threats of climate change to the forest			3	General comment.	None
We should strengthen this so that virgin fiber is more attractive to consumers	Promote the climate change and environmental benefits of using forest fiber and sending the recycled materials to china and other areas that need it since these areas frequently use very controversial fiber sources.		2	SFI has its Bioenergy and Climate Change Task Group. This task group has been monitoring developments in the area of climate change science for more than 5 years. The SFI program requirements do focus on the growth, harvest, efficient utilization of raw fiber from the forest and mandatory reforestation to regenerate that supply of fiber.	None
There is conflicting evidence related to the potential impacts of climate change. In addition, the role of human caused influences on climate change is highly contested.	The science around climate change causes and impacts are widely contested. It should not be the program participants' responsibility to increase or broaden awareness of this uncertain phenomenon.	Performance Measure 16.3. Certified Program Participants shall individually and/or through cooperative efforts involving SFI Implementation Committees, associations or other partners be aware of potential climate change impacts on forests, wildlife and biological diversity.	2	The Task Group has reviewed the comment but believes that Performance Measure 16.3 continues to be an effective requirement as it is currently written.	Refer to the SFI 2015-2019 Forest Management Standard Indicator 10.3 and the SFI 2015-2019 Fiber Sourcing Standard PM 5.3.
this has no credible auditable criteria for an SFI Participant, I suspect everyone knows that if it gets warmer or colder from anthropogenic or natural climate cycles, the forests will change.			3	General comment.	None

PM 16.3 Indicators:

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
Climate models have not proven that we are moving towards increased CO2 production.			3	General comment	None
Incorporate Performance Measure 16.3 into Performance Measure 16.1 indicators	Redundant with Performance Measure 16.1		2	Task Group has reviewed the comment but is of the opinion that the topic of climate change is best addressed with its own Indicator. PM 16.1 requires active research and/or support of research. PM 16.3 does not require the same, but rather it obligates PPs to use research to be knowledgeable. The fact that climate	Refer to the SFI 2015-2019 Forest Management Standard Indicator 10.3 and the SFI 2015-2019 Fiber Sourcing Standard PM 5.3.

				models are "not proven" suggests the need to monitor as opposed to actively participate in climate research.	
Climate models have not proven that we are moving towards increased CO2 production.			3	General comment.	None
Which programs do you trust?			3	General comment.	None

Use this space to propose any removals or additions for Objective 16

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
16.3 is meaningless as written.			3	General comment – the task group disagrees and believes Performance Measure 16.3 is an appropriate requirement for the SFI program.	Refer to the SFI 2015-2019 Forest Management Standard Indicator 10.3 and the SFI 2015-2019 Fiber Sourcing Standard PM 5.3.

Objective 17. Training and Education

Objective 17. Training and Education. To improve the implementation of *sustainable forestry* practices through appropriate training and education programs.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
Leave language as written currently	This is hard to meet due to the decrease in trained loggers		3	Comment is supportive of the existing Objective language.	None
	Why is there no training requirement for road contractors?		2	Tsk Group has reviewed the comment. Nothing in the Objective language precludes the training of road contractors.	None
	Oregon, Washington and California have more rigorous regulatory platform that is being ignored		3	General comment.	None
We support certified loggers and certified logging professionals (Master Logger program in Wisconsin). We are however, bound by the open bidding process.			3	General comment.	None
There are somewhat increased requirements here for written agreements requiring use of certified loggers where available or using producers who are trained and qualified. Also, training must include awareness of rare communities and a continuing education component.	We would recommend maintaining the current requirements for using qualified producers as this provides needed flexibility to smaller producers. We support the components of rare community awareness and continuing education.		2	Ask Group has reviewed the comment but believes the revised requirements for Performance Measure 17.1 regarding written agreements requiring the use of *qualified logging professionals* adds rigor to the SFI program.	Refer to the SFI 2015-2019 Forest Management Standard Indicator 11.1 and the SFI 2015-2019 Fiber Sourcing Standard PM 6.1.
See comments under Objective 11. Need to find ways to support and provide additional recognition and incentive for credible CLP programs.	See earlier comments under Objective 11.		2	Task Group has reviewed the comment. However, the case for *certified logging professionals* must be made by respective *SFI Implementation Committees* and not something that the SFI program can drive.	None
Education Materials	Including expert and regionally knowledgeable ENGO (not just state or local groups and all the other stakeholders named) input and framing in the education materials, would help validate them. If this is excluded the materials developed risk being framed with one sided lobby group materials that don't express a balanced perspective on the issues of invasive species, biological diversity, Forests of Exceptional Conservation Value and threatened and endangered species.		2	The Task Group has reviewed the comment and believes that the comment is addressed both with PM 12.1 SFI Forest Management Standard and PM 7.1 SFI Fiber Sourcing Standard which among other organizations require the involvement of conservation organizations, Indigenous Peoples and governments, community groups, labor and universities.	See PM 12.1 SFI Forest Management Standard and PM 7.1 SFI Fiber Sourcing Standard.

Performance Measure 17.1. *Certified Program Participant*s shall require appropriate training of personnel and contractors so that they are competent to fulfill their responsibilities under the

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
Some have suggested that the term "contractor" should be defined. It should not.	This has been discussed in every review since contractor was added. Contractor has not been defined because it was be nearly impossible to define all the types of contractors that might be used by certified program participants. The requirements and intent with this performance measure is clear. If you use a contractor for whatever reason and their work impacts your SFI program/performance, make sure they have the training necessary. Same for employees. If they do not have any impact on your SFI program/performance, nothing is required.	No changes. Do not define contractor as some have suggested.	2	The comment is supportive of retaining "contractor" as an undefined term. The Task Group has reviewed the comment and concurs.	None

PM 17.1 Indicators:

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
1. Written statement of commitment to the *SFI 2015-2019 Standard* communicated throughout the organization, particularly to facility and woodland managers, *fiber sourcing* staff and field foresters.					
2. Assignment and understanding of roles and responsibilities for achieving *SFI 2015-2019 Standard objectives.*					
3. Staff education and training sufficient to their roles and responsibilities.					
4. Contractor education and training sufficient to their roles and responsibilities.					
5. *Certified Program Participants* shall have a *written agreement for the use of certified logging professionals (where available) or wood producers that have completed training programs and are recognized as qualified logging professionals.*					
17.1.5- "written agreement for use of": Open to many interpretations and/or interpreting as a monopoly.	Remove "have written agreements for use of" use "promote use of".		2	The Task Group has reviewed the comment but believes the revised requirement for the use of a "written agreement" adds rigor to the Performance Measure.	Refer to the SFI 2015-2019 Forest Management Standard Indicator 11.1.5 and the SFI 2015-2019 Fiber Sourcing Standard Indicator 6.1.5.
"Written agreements" What does this mean? Does it mean we need this language in contracts	Clarify how to demonstrate compliance		2	Task Group has reviewed the comment. The comment seeks clarification as to what form(s) of documentation would demonstrate conformance to this Indicator. The Task Group purposely has decided not to define what form a written agreement must take allowing the program participant to determine what form work best for them.	Refer to the SFI 2015-2019 Forest Management Standard Indicator 11.1.5 and the SFI 2015-2019 Fiber Sourcing Standard Indicator 6.1.5.

	QLP - Its defined by a person – disregards the company or entity. Oregon professional logging program is defined as company not individual. Do you hire the individual or do you hire the company?	Add "a person or organization"		3	Comment addressed in Section 13 Definitions.	None
	Definition doesn't address the difference between "certified" and "accredited". Clarify			3	The term "accredited" logger is not used in the SFI program.	None
	Use of written agreements is too prescriptive. Add flexibility.	Remove "written agreements", use "contract or purchase order" instead and disclose training status		2	The Task Group has reviewed the comment but believes the revised requirement for the use of a "written agreement" adds rigor to the Performance Measure.	Refer to the SFI 2015-2019 Forest Management Standard Indicator 11.1.5 and the SFI 2015-2019 Fiber Sourcing Standard Indicator 6.1.5.
	If QLP or CLP is optional, the CLP programs might be supplanted. Find a creative way to promote for CLPs. EX/ Prior to 2008, customers placed emphasis on CLP.			2	Task Group has reviewed the comment. The Task Group believes that the case for *certified logging professionals* must be made by respective *SFI Implementation Committees* and not something that the SFI program can drive.	None
	"QLP on-site working as member of the crew" - How would this be monitored?	Remove AND SFI could work on a logger recruitment program		3	Comment addressed in Section 13 Definitions.	None
	Vague; what is required of the supplier? Clarify			3	Unclear what the reference to "supplier" is supposed to infer.	None
	Confusing between "certified logging professionals" and "Qualified Logging Professionals" – what is the hierarchy; which is preferred?	Clarify the intent is to give the option for using CLPs or QLPs (no hierarchal preference) regardless of whether CLP exists or not.		2	Task Group has reviewed the comment and believes the Comment understands there to be a preference for *certified logging professionals* over *qualified logging professional* – this is not correct. No preference exists nor is it implied.	None
	Confusing to say must use CLP/QLP in Standard, then allow for a 5% exception in Guidance.			2	Task Group has reviewed the comment and believes that the revised Guidance in SFI Section 6 regarding deliveries to SFI facilities by untrained loggers addresses the comment.	Refer to Section 6 Guidance part 10.
	Program participants should have the option to decide whether to use certified logging professionals "or" qualified logging professionals based upon their own determination of harvesting needs.	Preferential treatment should not be required or granted to certified logging professionals over qualified logging professionals.	5. Forestry enterprises shall have a program for the use of certified logging professionals (where available) or qualified logging professionals.	2	Task Group has reviewed the comment and is of the opinion that the revised Indicator 17.1.5 addresses the comment.	Refer to the SFI 2015-2019 Forest Management Standard Indicator 11.1.5 and the SFI 2015-2019 Fiber Sourcing Standard Indicator 6.1.5.
	Red-line version shows this indicator to be changed to indicate Certified Program Participants instead of Forestry Enterprises			3	General comment.	None
	The SFI Program's limited recognition of certified logger programs has hampered their growth and development across the United States. While SFI does show support by recognizing CLP in the Standard, the SFI Program falls short by not differentiating in a meaningful way the fiber harvested certified logging professionals from qualified logging professionals (QLP).	Without this recognition it is inevitable that the stability of these programs will be in jeopardy and will likely cease to exist due to deficit management and lack of funding or market incentive. The SFI Standard must differentiate between fiber harvested by certified logging professionals and fiber harvested by qualified logging professionals. In doing so, the SFI Program can show leadership by implementing an innovative way to address the challenge of certifying the fiber harvested from small family forests while ensuring sustainable harvest and reforestation	SFI Should develop a framework that would include the fiber harvested by certified logging professionals from small (<100 acre) family forests as certified fiber. This framework could create a partnership between ATFS, CLP and SFI which would expedite ATFS certification/audits by streamlining audits to focus on ATFS requirements not already included in CLP program certification standards.	2	SFI has a Small Lands task group that is looking at options for increasing the amount of certified fiber from small private lands.	None

		practices are implemented. It is wishful to expect a significant increase in the number of small family forests that are certified under ATFS or another program. Developing a framework for addressing this issue through the use of CLPs would be cost effective and appropriate.				
	The SFI Standard requires the Program Participant to have a written agreement for the use of certified logging professionals or wood producers recognized as QLP's.	In Canada (not sure about Nova Scotia), there is no program available to certify our contractors as logging professionals or registered QLP's. Most of the training is done by the company at regularly scheduled intervals and can include a number of different topics. In B.C all road and harvest block planning is completed by various resource professionals and not by the logging contractors. Therefore, written agreements may not be a necessary, but perhaps more of an optional requirement in Canada.	"Certified Program Participants shall use wood producers that have completed training programs OR are recognized qualified logging professionals determined by regional SIC's."	2	Task Group has reviewed the comment and is of the opinion that the revised Indicator 17.1.5 addresses the comment.	Refer to the SFI 2015-2019 Forest Management Standard Indicator 11.1.5 and the SFI 2015-2019 Fiber Sourcing Standard Indicator 6.1.5.
	This comment implies 100% of wood must come from CLP/QLP (notwithstanding the limit in Sect 6). Even with a 5% tolerance, there are so many circumstances that make it nearly impossible to achieve.	This is a non-issue for any of the operations we control (own land and stumpage). The issue is with private wood. In New Brunswick, wood purchased from small private landowners is done through government controlled marketing boards. This makes it difficult for individual companies to take the responsibility for training private producers since there is never any agreement or exchange that occurs directly with those producer; therefore, much more difficult to influence or enforce. This item is also indirectly incented through certified sourcing. Participants get to promote higher proportion of certified source by having more CLP/QLP.	Maintain wording as it was before, but add comment about 'participant continual effort to increase the supply of wood coming from CLP/QLP".	2	Task Group has reviewed the comment and believes that the revised Guidance in SFI Section 6 regarding deliveries to SFI facilities by untrained loggers addresses the comment.	Refer to Section 6 Guidance part 10.
	We support certified loggers and certified logging professionals (Master Logger program in Wisconsin). We are however bound by the open bidding process required by law.	We are however bound by the open bidding process required by law and while they may be available there may not be sufficient numbers of certified professionals available -and exclusive use where available could have a significant impact on stumpage prices - and may not necessarily result in improved outcomes.	Revise wording to "shall encourage the use of certified logging....."	2	Task Group has reviewed the comment and is of the opinion that the revised Indicator 17.1.5 addresses the comment.	Refer to the SFI 2015-2019 Forest Management Standard Indicator 11.1.5 and the SFI 2015-2019 Fiber Sourcing Standard Indicator 6.1.5.
	As written the definition of Qualified Logging Professional that 'for a logging crew to be considered trained, each crew must operate under the direction of a qualified logging professional that is on-site working as a member of the crew...' requires guidance from SFI in terms of what 'on-site' means in terms of a realistic view of actual time on-site (e.g. 100% of time, regularly, daily at some point?).	This is particularly important to ensure that Certifying Body audits of this Part are consistent.	SFI to define realistic view of "on site"	3	Comment addressed in SFI Section 13 – Definitions.	Refer to SFI Section 13.
	See comments under Objective 11. Clarify through additional language that the intent is to allow program participants to use either CLPs or QLPs, even in cases where CLPs exist. The SFI Program's limited recognition of certified logger programs has hampered their growth and development across the United States. While SFI does show support by recognizing CLP in the Standard, the SFI Program falls short by not differentiating in a meaningful way the fiber harvested certified logging	Second comments submitted by MN and WI SICs.	Second comments submitted by MN and WI SICs.	2	Task Group has reviewed the comment. The Task Group is of the opinion that the case for *certified logging professionals* must be made by respective *SFI Implementation Committees* and not something that the SFI program can drive. SFI cannot incent the use of CLPs over QLP as this	None

	professionals from qualified logging professionals (QLP). Second comments submitted by MN and WI SICs.				is an individual business decision made by the program participant.	
	No change was made to accommodate/incorporate comments previously sent by MNDNR Neither this PM nor any other part of the SFI Standard provides an incentive to maintain Certified Logging Professional programs nor does the standard provide added recognition of the benefits provided by certified logging programs		SFI should more clearly define and create incentive for CLP OR delete the term and associated requirements and rely on QLP to deliver sustainable harvests.	2	Task Group has reviewed the comment. The Task Group is of the opinion that the case for *certified logging professionals* must be made by respective *SFI Implementation Committees* and not something that the SFI program can drive. SFI cannot incent the use of CLPs over QLP as this is an individual business decision made by the program participant.	None
	A written agreement implies that I have to use CLP and QLP over other producers no matter what. As well the wording is awkward, who is the agreement with? Written agreements are missing in the definition section, this should be made clear.	This is not reasonable if a CLP or a QLP charge twice as much for their wood?	Certified Program Participants shall promote the use of certified logging professionals (where available) or wood producers that have completed training programs and are recognized as qualified logging professionals.	2	Task Group has reviewed the comment and concurs. The Task Group believes that the revised Indicator 17.1.5 addresses the comment.	Refer to the SFI 2015-2019 Forest Management Standard Indicator 11.1.5 and the SFI 2015-2019 Fiber Sourcing Standard Indicator 6.1.5.

Performance Measure 17.2. *Certified Program Participants* shall work individually and/or with *SFI Implementation Committees*, logging or *forestry* associations, or appropriate agencies or others in the *forestry* community to foster improvement in the professionalism of *wood producers*.

PM 17.2 Indicators:

	Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
1. Participation in or support of *SFI Implementation Committees* to establish criteria and identify delivery mechanisms for *wood producers'* training courses and periodic continuing education 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. Awareness of rare forested natural communities as identified by provincial or state agencies or by credible organizations such as NatureServe, The Nature Conservancy, etc.** **f. logging safety;** **g. 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;** **h. transportation issues;** **i. business management;** **j. public *policy* and outreach; and** **k. awareness of emerging technologies.**					
	17.2.1 – "training courses" and "continuing education". Unclear what "continuing education" entails AND "courses" has negative associations.	Clarify what is required for "continuing education" and remove the term "courses".		2	The revised Indicator 17.2.1 outlines what the *wood producer* training requirements are.	Refer to the SFI 2015-2019 Forest Management Standard Indicator 11.2.1 and the SFI 2015-2019 Fiber Sourcing Standard Indicator 6.2.1.
	Requiring continuing education removes the responsibility of	Remove the requirement for continuing education		2	Task Group disagrees with removal of Indicator	Refer to the SFI 2015-2019

	the SIC to manage "appropriate training of personnel and contractors" (17.1) and it is costly and not needed. SICs should be the ones to be able to address CE.	(17.2.2) AND articulate that SIC will determine appropriate need for and content of continuing education.			17.2.2. Also, Performance Measures 17.1, 17.2, and 17.3 all reinforce the roles played by the SIC in developing and delivering wood producer training programs.	Forest Management Standard Indicator 11.2.1 and the SFI 2015-2019 Fiber Sourcing Standard Indicator 6.2.1.
	This is too stringent; creates a different standard for those with forestry degrees and loggers (former doesn't need continuing education, the later now would). This adds bureaucracy.			2	Task Group disagrees that the requirement creates a different standard.	None
	Modify indicator 1 wording	SICs are responsible for meeting the spirit and intent of PM 17.2 (per QLP definition). Modify indicator wording to recognize SIC flexibility in addressing some or all of the training topics listed depending on local circumstances.	Add "where applicable" to indicator 1	2	The Task Group believes that the revised Indicator 17.2.1 addresses the comment.	Refer to the SFI 2015-2019 Forest Management Standard Indicator 11.2.1 and the SFI 2015-2019 Fiber Sourcing Standard Indicator 6.2.1.
	17.2.1 does not show the words "and periodic continuation education" which is in the first draft.	While we do not mind "periodic continuing education" we feel like it should be managed by the State SFI Implementation Committees	Keep as the 2010-2014 Standard language.	2	Task Group has reviewed the comment but is of the opinion that revised Indicator 17.2.1 enhances the requirement of the Performance Measure.	Refer to the SFI 2015-2019 Forest Management Standard Indicator 11.2.1 and the SFI 2015-2019 Fiber Sourcing Standard Indicator 6.2.1.
	Supportive of including in wood producers' training course, "awareness of rare forested natural communities as identified by state, agencies, or by credible organizations..... Correct abbreviation for Canadian Centre for Occupational health and Safety		Change "(COHS)" to "(CCOHS)"	1	Edit made.	Refer to the SFI 2015-2019 Forest Management Standard Indicator 11.2.1 and the SFI 2015-2019 Fiber Sourcing Standard Indicator 6.2.1.
	Strongly support requiring continuing education for wood producers in addition to completion of core training. Continuing education is an important component of logger training and education efforts. I think e) may be a bit hard to explain to every logger and difficult to audit. This may not be the role of loggers to know the intimate details of FECVs.	NA	NA	2	Comment is supportive of proposed revision to Indicator 17.2.1.	Refer to the SFI 2015-2019 Forest Management Standard Indicator 11.2.1 and the SFI 2015-2019 Fiber Sourcing Standard Indicator 6.2.1.
	The U.S. and Canadian national standard for the definition of rare natural communities is that of NatureServe.	For Indicator 1e, the use of the word 'or' opens the door to inconsistent interpretation of what is or is not a rare natural community.	.... agencies and credible organizations such as NatureServe	2	Task Group has reviewed the comment and concurs with the proposed revision.	Refer to the SFI 2015-2019 Forest Management Standard Indicator 11.2.1 and the SFI 2015-2019 Fiber Sourcing Standard Indicator 6.2.1.
2. The SIC-approved wood producer's training programs shall have a continuing education component with coursework that supports the current logger training programs, safety and the principles of sustainable forestry.						
		17.2.2 I don't think WCSIC or members should have to be responsible for continuing education for wood producers. This is applicable to professionals. A possible costly venture with minimal return. This needs explaining or drop it.		2	Comment misses the fact that SFI *wood producer* training must be approved by the respective SIC – this is an existing requirement. Dropping this requirement will not improve the SFI standards.	
	Training and continuous education in Western Canada is typically delivered through annual training sessions and on-block pre-works, not through course work per sec which could be interpreted as requiring textbook or module type materials.	Western Canada SIC (WCSIC) membership has concern that the term 'coursework' will be interpreted by auditors to require training materials that is significantly different from our current logger training approach.	Change 'coursework' to 'content' The SIC-approved wood producer's training programs shall have a continuing education component with content that supports the current logger training programs, safety and the principles of sustainable forestry.	2	The Task Group reviewed the comment but does not believe that the term "coursework" is problematic as claimed in the comment.	
	We do not believe we need the "continuing education" to be added to the Standard.	We believe all continuing education should be managed by the State SFI Implementation Committees. Why has this stipulation all of a sudden	Keep as the 2010-2014 Standard language.	2	Task Group has reviewed the comment but does not believe that removal of the proposed requirement for continuing education will	Refer to the SFI 2015-2019 Forest Management Standard Indicator 11.2.2 and the SFI

	occurred after 10 years of very good logger training and continuing education where and when needed?			enhance the standard. One of the basic tenants of the SFI program is continual improvement which the requirement for continual education for wood producers supports.	2015-2019 Fiber Sourcing Standard Indicator 6.2.2.
"coursework" implies a formal process involving study material, assignments and exams or evaluation processes. This is inconsistent with common practice within the WCSIC. Training is generally a delivered presentation with a desire for interaction between presenters and trainees.	change to reflect common practice	replace "coursework" with "content".	2	The Task Group reviewed the comment but does not believe that the term "coursework" is problematic as claimed in the comment.	None
Support requiring continuing education for wood producers in addition to completion of core training. Continuing education is an important component of logger training and education efforts.			2	Comment is supportive of the proposed revision to Indicator 17.2.2.	Refer to the SFI 2015-2019 Forest Management Standard Indicator 11.2.2 and the SFI 2015-2019 Fiber Sourcing Standard Indicator 6.2.2.
It is appropriate to offer continuing education for loggers to enhance and improve their skills and knowledge. We should not make any such continuing education a requirement of being considered a "trained logger". No such expectation exists for the "qualified resource professional" who once they have received their formal education (a college degree) no-one challenges their knowledge and education even though they may have had no continued education for years and even decades.		Guidance should ensure that continuing education is not a requirement.	2	Task Group has reviewed the comment but does not believe that removal of the proposed requirement for continuing education will enhance the standard. One of the basic tenants of the SFI program is continual improvement which the requirement for continual education for wood producers supports.	None
3. 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.**					
Requirements in Indicator 17.2.3 make it a surrogate for sustainable forestry. Adds unnecessary rigor in day-to-day operations; and is redundant with Pacific states' regulations (redundant with operations)	Add "when states have more rigorous regulations, SIC will consider those regulations"		3	Comment misunderstands that Indicator 17.2.3 is for *certified logging professionals* which is an optional approach for those SFI Implementation Committees that decide to pursue this level of logging training.	Refer to the SFI 2015-2019 Forest Management Standard Indicator 11.2.3 and the SFI 2015-2019 Fiber Sourcing Standard Indicator 6.2.3.
Logger certification programs don't exist unless they choose to go through the process	Remove "where they exists", use "when requested" instead		2	Task Group has reviewed the comment but is of the opinion that the suggested wording does not measurably improve the standard.	None
Add "soil protection" to d). Loggers should be responsible for certain elements in Objective 2 as well as 3.	Add "soil protection" to d). Loggers should be responsible for certain elements in Objective 2 as well as 3.	Add "soil protection" to d).	2	Task Group has reviewed the comment but is of the opinion that the suggested revision does not measurably improve the standard.	None
"b. independent in-the-forest verification of conformance with the logger certification program standards." This language discriminates against state's where rigorous forest	This language discriminates against state's where rigorous forest business regulations exist. The Standard must acknowledge the value of these	b. independent in-the-forest verification of conformance with the logger certification program standards. In state's having	2	Task Group has reviewed the comment but is of the opinion that inspections by government agencies do not address the full suite of training	None

business regulations exist. In such states, state agencies conduct compliance enforcement--therefor satisfying the "independent 3rd party expectation. The SFI Standard should explicitly say this situation in words. The State implementation Committees should be given written discretion by the SFI Standard to approve this type of compliance in its logger training program.	rigorous state regulations, and the government agencies that enforce them. In such states, state agencies conduct compliance enforcement--therefor satisfying the "independent 3rd party expectation. The SFI Standard should explicitly say this situation in words. The State implementation Committees should be given written discretion by the SFI Standard to approve this type of compliance in its logger training program.	rigorous state regulations surrounding forest businesses, the State Implementation Committee may accept verification of conformance by government agencies as sufficient for the SFI standard.		requirements that comprise an SIC approve *certified logging professional* training course. Also, frequency of inspection and the inspection focus areas can and do vary across government agencies.	
See previous comments about the need to either strengthen the difference (value/incentives) between CLP and QLP, or drop the references to CLP.	Unless CLP is strengthened in the SFI program, keeping both terms (CLP and QLP) only creates confusion and false perceptions.		2	Task Group has reviewed the comment. The Task Group is of the opinion that the case for *certified logging professionals* must be made by respective *SFI Implementation Committees* and not something that the SFI program can drive. SFI cannot incent the use of CLPs over QLP as this is an individual business decision made by the program participant.	None

Use this space to propose any removals or additions for Objective 17:

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
17.2.1 Periodic continuing education should be removed, and, 17.2.2 should be removed.			2	Task Group has reviewed the comment and does not believe that removal of Indicators 17.2.1 and 17.2.2 will enhance the SFI standard.	Refer to the SFI 2015-2019 Forest Management Standard Indicators 11.2.1 & 11.2.2 and the SFI 2015-2019 Fiber Sourcing Standard Indicators 6.2.1 & 6.2.2.

Objective 18. Community Involvement and Landowner Outreach in the Practice of *Sustainable Forestry*

Objective 18. Community Involvement and Landowner Outreach in the Practice of Sustainable Forestry. *To broaden the practice of sustainable forestry by encouraging the public and forestry community to participate in the commitment to sustainable forestry, and publicly report progress*

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
Objective 18. Landowner outreach should be separate from community involvement.	Community Involvement and Landowner Outreach are two entirely separate things and need to be kept separate.		2	Task Group has reviewed the comment but disagrees with separating Community Involvement and Landowner Outreach.	None
Does this apply to both fiber sourcing and land management? Clarify			2	Requirement in Objective 18 apply to both forest landowners/managers and fiber procurement organizations except Ind. 18.1.5 which will be moved to the Fiber Sourcing Requirements.	Refer to the SFI 2015-2019 Forest Management Standard Objective 12 and the SFI 2015-2019 Fiber Sourcing Standard Objective 7.

	Community involvement and landowner outreach are two different things with two different goals.	Separate into two objectives.		2	Task Group has reviewed the comment but disagrees with separating Community Involvement and Landowner Outreach.	None

Performance Measure 18.1. *Certified Program Participant*s 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

	Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
	Auditors spend time with each applicant auditing SIC – this is duplicative and cumbersome	SFI should approve SICs or make a one-stop approval results. OR SICs should be audited AND make this information available to applicants and auditors.		2	The conduct of a third-party audit (including verification of requirements related to SFI Implementation Committees is determined by the Certification Bodies and not SFI.	None
	Objective 18. Landowner outreach should be separate from community involvement.	Community Involvement and Landowner Outreach are two entirely separate things and need to be kept separate.		2	Task Group has reviewed the comment but disagrees with separating Community Involvement and Landowner Outreach.	None
	Promotional requirements (i.e., of sustainable forestry and forest certification) are a bit odd to include in a standard assessing sustainable forestry on the lands we manage.	While many program participants likely carry out many of these promotional activities, they don't seem appropriate in a standard gauging the job we are doing managing our lands and what that means for the certified products that result (e.g., timber/wood).		2	Task Group has reviewed the comment but does not agree that promotion of sustainable forest management is not appropriate for all SFI program participants.	None

PM 18.1 Indicators:

	Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
1. Support, including financial, for efforts of *SFI Implementation Committees*. **2. Support for education and outreach to forest landowners, describing the importance and providing implementation guidance on:** **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*;** **g. characteristics of *special sites*, and** **h. reduction of wildfire risk.**					

18.1.2 and 18.1.3. These indicators don't apply for non-purchasers.			2	Task Group has reviewed the comment but believes that it is appropriate for forest landowners and managers to meet the requirements of revised Indicators 18.1.2 and 18.1.3.	Refer to the SFI 2015-2019 Forest Management Standard Indicators 12.1.2 and 12.1.3 and the SFI 2015-2019 Fiber Sourcing Standard Indicators 7.1.2 and 7.1.3.
Support of SICs is not equitable among all	Add language that each SIC has the ability to set levels of support required		2	This comment relates to issues of SFI Implementation Committee governance which is outside of the scope of the SFI standard requirements.	None
Are some items or all the items on the list required?	Clarify some or all		2	All requirements of the Indicator apply.	None
Indicator 2 is not applicable to all certified program participants	Our organization does not work with private forest landowners	Add "where applicable" to Indicator 2 or it it is intended that SICs take on this role, then SICs should be referenced in the PM wording.	2	Task Group has reviewed the comment but believes that it is appropriate for forest landowners and managers to meet the requirements of revised Indicators 18.1.2.	Refer to the SFI 2015-2019 Forest Management Standard Indicator 12.1.2 and the SFI 2015-2019 Fiber Sourcing Standard Indicator 7.1.2.
Although it is a responsibility of all Program Participants to support sustainable forestry through community involvement, we don't believe it is the responsibility of individual landowners to support education and outreach of other landowners. Landowners should be able to demonstrate such support through cooperative efforts such as participation in the SICs.	18.1.2, as written, requires Program Participants to support for education and outreach to other forest landowners. Historically we have supported education and outreach to other landowners through the SICs rather than producing our own brochure or other outreach efforts. This requirement was in the certified sourcing section (not applicable to landowners) in the 2010-2014 version of the Standard. The additional wording needs to be added for landowners who do not work directly with other landowners.	Support individually or cooperatively through SFI Implementation Committees for education and outreach to forest landowners…	2	Task Group believes that the comment is addressed by the revised Indicator 18.1.2.	Refer to the SFI 2015-2019 Forest Management Standard Indicator 12.1.2 and the SFI 2015-2019 Fiber Sourcing Standard Indicator 7.1.2.
Good simplification and expansion to include wildfire risk materials.	Good simplification and expansion to include wildfire risk materials.	NA	2	Comment is supportive of the draft language.	None
3. 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*.					
Rmove	Confusing and hard to meet		2	Task Group has reviewed the comment but believes the Indicator 18.1.3 is an effective requirement.	Refer to the SFI 2015-2019 Forest Management Standard Indicator 12.1.3 and the SFI 2015-2019 Fiber Sourcing Standard Indicator 7.1.3.
Indicator 3 is not applicable to all certified program participants	Our organization does not work with private managed forests	Add "where applicable" to Indicator 3 or it it is intended that SICs take on this role, then SICs should be referenced in the PM wording.	2	Task Group has reviewed the comment but believes the Indicator 18.1.3 is an effective requirement as written. Note that this is an existing requirement.	Refer to the SFI 2015-2019 Forest Management Standard Indicator 12.1.3 and the SFI 2015-2019 Fiber Sourcing Standard Indicator 7.1.3.
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 seems to have a very narrow focus – "voluntary, market-based incentive programs".	No new language offered, but consider revision of this Indicator using terminology that better explains its purpose and broadens what is acceptable to make conformance more feasible and	2	This is an existing requirement of the SFI 2010-2014 standard. The terminology used has not posed any difficulties as judged by an absence of request for SFI interpretations regarding this requirement.	None

		understandable.			
4. *Certified Program Participants* are knowledgeable about credible regional *conservation* planning and priority-setting efforts that include Indigenous Peoples and a broad range of stakeholders and have a *program* to take into account the results of these efforts in planning.					
Add "if applicable" after Indigenous Peoples	Priority-setting efforts that include Indigenous Peoples does not apply in every area SFI principals are applied.	add "if applicable" after Indigenous Peoples	2	Task Group has reviewed the comment and believes that the revised Indicator 18.1.4 addresses the comment.	Refer to the SFI 2015-2019 Forest Management Standard Indicator 12.1.3 and the SFI 2015-2019 Fiber Sourcing Standard Indicator 7.1.3.
Indigenous peoples are a subset of stakeholders	Reword to "priority-setting that include a broad range of stakeholders, including Indigenous Peoples. OR, add language "if applicable". Perhaps they don't exist in this area.		2	Task Group has reviewed the comment and believes that the revised Indicator 18.1.4 addresses the comment.	Refer to the SFI 2015-2019 Fiber Sourcing Standard Indicator 7.1.4.
Be consists with concerns and resolution for 4.1.4 same concern	Separate into two objectives.		2	Task Group has reviewed the comment but disagrees with separating Community Involvement and Landowner Outreach.	None
This indicator should only apply to program participants that source fiber from areas where Indigenous Peoples are present. Also, Indigenous Peoples should be defined as federally listed tribes.		4. Certified Program Participants are knowledgeable about credible regional conservation planning and priority-setting efforts that include Indigenous Peoples and a broad range of stakeholders and have a program to take into account the results of these efforts in planning if regionally appropriate.	2	The Task Group has reviewed the comment and has revised the indicator to remove the reference to Indigenous peoples. However, it does not believe adopting the remaining suggested text adds to the clarity of the indicator.	Refer to the SFI 2015-2019 Fiber Sourcing Standard Indicator 7.1.4.
Thought this had been moved to PM 4.1?			2	The Task Group has reviewed the comment and has decided to move this requirement to the Fiber Sourcing requirements.	Refer to the SFI 2015-2019 Fiber Sourcing Standard Indicator 7.1.4.
Thought this was now addressed in Obj. 4?			2	The Task Group has reviewed the comment and has decided to move this requirement to the Fiber Sourcing requirements.	Refer to the SFI 2015-2019 Fiber Sourcing Standard Indicator 7.1.4.
There is no reason to single-out "Indigenous Peoples" or draw special attention to this group over other significant stakeholders.	There is no reason to single-out "Indigenous Peoples" or draw special attention to this group over other significant stakeholders.	Use the following instead: "Certified 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."	2	The Task Group has reviewed the comment and has revised the indicator to remove the reference to Indigenous peoples. However, it does not believe adopting the remaining suggested text adds to the clarity of the indicator.	Refer to the SFI 2015-2019 Fiber Sourcing Standard Indicator 7.1.4.
The standard, as written, implies that the only credible regional conservation planning and priority-setting efforts a Certified Program Participant should be knowledgeable about are those that include Indigenous Peoples. This is not what we believe the intent of this indicator is and would suggest that the language be clarified.	To clarify the language of the Indicator to more clearly articulate its intent.	4. Certified Program Participants are knowledgeable about credible regional conservation planning and priority-setting efforts including those of Indigenous Peoples, when appropriate, and a broad range of stakeholders and have a program to take into account the results of these efforts in planning.	2	The Task Group has reviewed the comment and has revised the indicator to remove the reference to Indigenous peoples. However, it does not believe adopting the remaining suggested text adds to the clarity of the indicator.	Refer to the SFI 2015-2019 Fiber Sourcing Standard Indicator 7.1.4.
Remove Indigenous Peoples	This is sufficiently addressed with addition of objective 8. INdicator is also redundant with Objective 4(4.1.4)		2	Task Group has reviewed the comment and believes that the revised Indicator 18.1.4 addresses the comment.	Refer to the SFI 2015-2019 Fiber Sourcing Standard Indicator 7.1.4.
The intent of this section is already covered in 9.1.1.	already covered in 9.1.1.	delete	2	The Task Group has reviewed the comment but is of the opinion that Indicator 18.1.4 is focused more on knowledge of regionally conservation	Refer to the SFI 2015-2019 Fiber Sourcing Standard Indicator 7.1.4.

				planning and priority-setting efforts whereas Indicator 9.1.1 is focused on the need to have a program to address conservation of biodiversity.	
Delete this indicator or 4.1.4. Redundant with new indicator in Objective 4 - 4.1.4.	Delete or delete 4.1.4. Redundant. Pick one.	Delete or delete 4.1.4. Redundant. Pick one.	2	Indicator 18.1.4 to be moved to the Fiber Sourcing requirements thereby removing the duplication with Indicator 4.1.4.	Refer to the SFI 2015-2019 Fiber Sourcing Standard Indicator 7.1.4.
Add "if applicable" after Indigenous Peoples	Priority-setting efforts that include Indigenous Peoples does not apply in every area SFI principals are applied.	add "if applicable" after Indigenous Peoples	2	Task Group has reviewed the comment and believes that the revised Indicator 18.1.4 addresses the comment.	Refer to the SFI 2015-2019 Fiber Sourcing Standard Indicator 7.1.4.

Performance Measure 18.2. *Certified Program Participant*s shall support and promote, at the state, provincial or other appropriate levels, mechanisms for public outreach, education and involvement related to sustainable forest management.

PM 18.2 Indicators:

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
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.** **2. Encourage forest landowners to participate in forest management certification programs.**					
Promoting a "forest management certification program" is not the role of a public agency'. The requirement was moved from fiber so urcing and could be awkward for forest managers.	Clarify or move back to fiber sourcing section		2	The Task Group has removed this Indicator as the intent is captured in Performance Measure 18.1.	Refer to the SFI 2015-2019 Forest Management Standard PM 12.1 and the SFI 2015-2019 Fiber Sourcing Standard PM 7.1.
Indicator 2 is not applicable to all certified program participants	Our organization does not work with private forest landowners	Add "where applicable" to Indicator 2 or it it is intended that SICs take on this role, then SICs should be referenced in the PM or indicator wording.	2	The Task Group has removed this Indicator as the intent is captured in Performance Measure 18.1.	Refer to the SFI 2015-2019 Forest Management Standard PM 12.1 and the SFI 2015-2019 Fiber Sourcing Standard PM 7.1.
For landowners this should be done via SIC efforts.		Through individual or group efforts (SIC), encourage forest landowners to participate in forest management certification programs.	2	The Task Group has removed this Indicator as the intent is captured in Performance Measure 18.1.	Refer to the SFI 2015-2019 Forest Management Standard PM 12.1 and the SFI 2015-2019 Fiber Sourcing Standard PM 7.1.
Although it is a responsibility of all Program Participants to support certification through community involvement, we don't believe it is the responsibility of individual landowners to encourage other landowners to participate in certification programs. Landowners should be able to demonstrate such encouragement through cooperative efforts such as participation in the SICs.	This requirement was in the certified sourcing section (not applicable to landowners) in the 2010-2014 version of the Standard. The additional wording needs to be added for landowners who do not work directly with other landowners.	Individually or cooperatively through SFI Implementation Committees, encourage forest landowners to participate in forest management certification programs.	2	The Task Group has removed this Indicator as the intent is captured in Performance Measure 18.1.	Refer to the SFI 2015-2019 Forest Management PM 12.1 and the SFI 2015-2019 Fiber Sourcing Standard PM 7.1.

	This should not be a requirement of land managers.	Inappropriate to expect land managers to promote participation in certification programs on other people's lands. It may be contrary to public/political will in some cases.	Delete this Indicator - or return it to fiber-sourcing section to apply only to wood user's NOT land managers.	2	The Task Group has removed this Indicator as the intent is captured in Performance Measure 18.1.	Refer to the SFI 2015-2019 Forest Management PM 12.1 and the SFI 2015-2019 Fiber Sourcing PM 7.1.
	This is inappropriate to expect of either public or private land managers. There are very few parts of the Country where land managers see any financial return on their investment to certify lands under SFI. To expect these very same landowners to promote SFI FM certification on additional acres would only further reduce any likelihood of financial incentives and could reduce their competitiveness in the market place. For public land managers, any attempt to promote one forest certification program over another would be seen as promoting a bias and unfair advantage. Additionally, private land managers could see this as an inappropriate use of influence / role for public land management agencies. We agree. This indicator was previously in the Fiber Sourcing section. Suggest moving it back to Objectives 9-14. If a Fiber Sourcing company wants to engage and encourage land managers within their "wood basket" to seek SFI certification, that is completely their right and is a strategic move. For land managers, the focus should be on providing information and partnering / cooperating with other land owners. These elements are addressed elsewhere, in numerous places in the SFI standard (including in Objective 19 as an example). Sustainable forestry should be the goal ... not SFI or any other forest certification program.	This is inappropriate to expect of either public or private land managers. There are very few parts of the Country where land managers see any financial return on their investment to certify lands under SFI. To expect these very same landowners to promote SFI FM certification on additional acres would only further reduce any likelihood of financial incentives and could reduce their competitiveness in the market place. For public land managers, any attempt to promote one forest certification program over another would be seen as promoting a bias and unfair advantage. Additionally, private land managers could see this as an inappropriate use of influence / role for public land management agencies. We agree. This indicator was previously in the Fiber Sourcing section. Suggest moving it back to Objectives 9-14. If a Fiber Sourcing company wants to engage and encourage land managers within their "wood basket" to seek SFI certification, that is completely their right and is a strategic move. For land managers, the focus should be on providing information and partnering / cooperating with other land owners. These elements are addressed elsewhere, in numerous places in the SFI standard. Sustainable forestry should be the goal ... not SFI or any other forest certification program.	Delete or move back to the Fiber Sourcing section.	2	The Task Group has removed this Indicator as the intent is captured in Performance Measure 18.1.	Refer to the SFI 2015-2019 Forest Management PM 12.1 and the SFI 2015-2019 Fiber Sourcing PM 7.1.
	This really seems inappropriate, and potentially a conflict of interst, for forest managers. Which certification program do we promote?Potentially lessens any market advantage of being certified.		Suggest deleting this indicator.	2	The Task Group has removed this Indicator as the intent is captured in Performance Measure 18.1.	Refer to the SFI 2015-2019 Forest Management PM 12.1 and the SFI 2015-2019 Fiber Sourcing PM 7.1.

Performance Measure 18.3. *Certified Program Participant*s shall establish, at the state, provincial, or other appropriate levels, procedures to address concerns raised by loggers, consulting foresters, employees, unions, the public or other *Program Participant*s regarding practices that appear inconsistent with the *SFI Standard principles* and *objectives*.

PM 18.3 Indicators:

1. Support for SFI Implementation Committees (e.g. toll-free numbers and other efforts) to address concerns about apparent nonconforming practices.
2. Process to receive and respond to public inquiries. SFI Implementation Committees shall submit data annually to SFI Inc. regarding concerns received and responses.

Use this space to propose any removals or additions for Objective 18:

	Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language

This is good. There is no reason all the specific references to indigenous peoples should not be captured under this objective.			3	Comment is supportive of draft language for Ind. 18.1.4.	Refer to the SFI 2015-2019 Fiber Sourcing Standard Indicator 7.1.4.

Objective 19: *Public Land* Management Responsibilities

Objective 19: Public Land Management Responsibilities. To promote and implement sustainable forest management on public lands.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
Is there a comparable Objective for Tribal Land Management Responsibilities? Does this exist?	Add a mention of tribal to this objective		2	Task Group has reviewed the comment but does not believe the suggested edit will enhance the requirement of Objective 19.	None
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 (2010-2014): Indicators 18.1.1, 18.1.2, 18.2.1, and 18.2.2.	None provided. No specific change proposed.	None provided. No specific change proposed.	2	Comment 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

Performance Measure 19.1. *Certified Program Participants* with forest *management responsibilities on public lands* shall participate in the development of *public* land planning and management processes.

PM 19.1 Indicators:

1. Involvement in public land planning and management activities with appropriate governmental entities and the public.
2. Appropriate contact with local stakeholders over forest management issues through state, provincial, federal or independent collaboration.

Use this space to propose any removals or additions for Objective 19:

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
Reinstate the PM on collaboration with Indigenous People (old PM 18.2 / now 19.2). This expectation is most appropriate for public land entities and has been effective in leveraging collaboration. Delete new Objective 8.			2	Comment misses the fact that the requirement of existing PM 18.2 are now in PM 8.2.	Refer to the SFI 2015-2019 Forest Management Standard PM 8.2.
Reinstate the PM on collaboration with Indigenous People (old PM 18.2 / now 19.2). This expectation is most appropriate for public land entities. This change should correspond with Deletion of new Objective 8.			2	Comment misses the fact that the requirement of existing PM 18.2 are now in PM 8.2.	Refer to the SFI 2015-2019 Forest Management Standard PM 8.2.
Stakeholder Consultation- Make it mandatory that certifiers consult extensively with local stakeholders including ENGOs and First Nations and indigenous peoples during the auditing process. In addition to the improvements recommended above, Canopy encourages SFI to include specific language in the standard to address this.			2	The Task Group has reviewed the comment and believes the revised requirements in SFI Section 9 address the comment. The SFI technical report to the client must base its decision to award initial certification or re-certification in part based on information regarding any meetings or correspondence between the audit team and government agencies, community groups, affected Indigenous Peoples and conservation organizations.	Refer to SFI 20915 -2019 Section 9 - SFI 2015-2019 Audit Procedures and Auditor Qualifications and Accreditation.

Objective 20. Communications and Public Reporting

Objective 20. Communications and Public Reporting. To broaden the practice of *sustainable forestry* by documenting progress and opportunities for improvement.

Performance Measure 20.1. 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 2015-2019 Standard*.

PM 20.1 Indicator:

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
1. The summary audit report submitted by the *Certified 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 *Certified 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

In audit reports focus on non-compliance and don't reflect the full depth and scope of the audit – full biodiversity protection – what's going well.	Update to provide more holistic perspective.		2	The Task Group has reviewed the comment and is of the opinion that although the Indicator identifies the minimum requirements it does not restrict the inclusion of additional information that a program participant may want to communicate via their public summary audit report.	Refer to the SFI 2015-2019 Forest Management Standard PM 14.1 and the SFI 2015-2019 Fiber Sourcing Standard PM 9.1.
May not send the right message to the public or other stakeholders	Used as a public communication opportunity, therefore they need to be: more understandable; enhance awareness of SFI; emphasize protection, conservation and sustainability		2	The Task Group has reviewed the comment and is of the opinion that although the Indicator identifies the minimum requirements it does not restrict the inclusion of additional information that a program participant may want to communicate via their public summary audit report.	Refer to the SFI 2015-2019 Forest Management Standard PM 14.1 and the SFI 2015-2019 Fiber Sourcing Standard PM 9.1.

Performance Measure 20.2. *Program Participant*s shall report annually to *SFI Inc*. on their conformance with the *SFI 2015-2019 Standard*.

PM 20.2 Indicators:

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
1. Prompt response to the SFI annual progress report.					
How to demonstrate submittal?	Add a date stamp to the submission		3	Note: The SFI database includes an automatic email when a report is approved. There is also an option for the company user to generate a summary report which includes the date stamp and report status.	None
2. Recordkeeping for all the categories of information needed for SFI annual progress reports.					
Consider removal.	This is available via the SFI web site.		2	Comment misunderstands the requirement of Indicator 20.2.2 which is related to recordkeeping of the information needed to complete the Annual Progress Report - not keeping a record of the Annual Progress Report itself.	Refer to the SFI 2015-2019 Forest Management Standard PM 14.2.2 and the SFI 2015-2019 Fiber Sourcing Standard PM 9.2.2.
3. Maintenance of copies of past reports to document progress and improvements to demonstrate conformance to the *SFI 2015-2019 Standard*.					

Use this space to propose any removals or additions for Objective 20:

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language

Remove 20.2.3 as the information should be availble through the SFI program website and is generally considered in the managment review.				While copies of the annual progress report will be available on the SFI website it does not preclude program participants from keeping copies of the report in other formats.	None

Objective 21. 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*.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
Nowhere in the Standard does it require an internal audit prior to the initial audit but the certifying bodies expect it. Note: AB requires a completed internal audit prior to initial certification and recertification audit.	Add in 21.1.3 that an internal audit must be conducted prior to an initial audit and annually to be consistent with ANAB.		2	Task Group believes the existing requirement is sufficient given the AB requirement for an annual internal audit.	None

Performance Measure 21.1. *Certified Program Participant*s 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.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
21.1 – "systems". Need consistent use of "system" or "program".		Use "program" consistently throughout the standard.	2	Task Group has reviewed the comment and does not believe the use of the term system is problematic.	None

PM 21.1 Indicators:

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
1. System to review commitments, *programs* and procedures to evaluate effectiveness. **2. System for collecting, reviewing, and reporting information to management regarding progress in achieving *SFI 2015-2019 Standard objectives* and *performance measures*.** **3. Annual review of progress by management and determination of changes and improvements necessary to continually improve conformance to the *SFI 2015-2019 Standard*.**					
This is not consistent with ISO 17021 - Make consistent			2	Comment believes this requirement is not consistent with ISO 17021 without saying how it is	None

				inconsistent.	

Use this space to propose any removals or additions for Objective 21:

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
This term has created a negative behavior of starting low so there is room for improvement Add "where needed" OR define better			2	Comment not understood – not certain which "term" is being referred to.	None
There was discussion of inclusion of an internal audit annually. This should not be explicitly required so long as participants are thorough reviewing items through 21.1.1			2	Task Group believes the existing requirement is sufficient given the AB requirement for an annual internal audit.	None

SECTION 3. SFI CHAIN-OF-CUSTODY STANDARD

PREFACE

SFI Inc. is an independent, non-profit, charitable organization dedicated to promoting sustainable forest management in North America and supporting responsible procurement globally. The SFI Board is a three chamber Board of Directors representing environmental, social and economic interests equally, and the program addresses local needs through its grassroots network of 35 SFI Implementation Committees across North America. *SFI Inc*. directs all elements of the SFI program including the SFI forest standard, chain-of-custody certification, responsible *fiber sourcing* requirements, labeling and marketing.

Consumers in growing numbers want assurance that their buying decisions represent a sound environmental choice. They are asking for proof that wood, paper and packaging products are made with raw materials from *certified forest content* or *certified sourcing*. The SFI Chain-of-Custody Standard and Associated Labels, implemented together with certification to the *SFI 2015-2019 Standard* and the SFI Rules For Use of On-Product Labels, delivers a reliable and credible mechanism so businesses can provide this assurance to customers.

Certified Program Participants practice responsible forestry on the lands they manage and, once they are successfully audited by an independent *SFI certification body*, they can make claims about SFI forest management certification and access SFI-*certified content* labels. They also need to achieve a separate third-party chain of custody certification.

Chain of custody is an accounting system process that tracks wood fiber through the different stages of production. Companies can make claims about how much of their product comes from certified lands, how much contains *post-consumer recycled content*, and how much is responsibly sourced fiber through unique SFI *fiber sourcing* certification. These claims can be made based on either the physical separation or percentage-based methods of tracking *certified forest content* and *certified sourcing*.

The *SFI* program addresses the fact that only 10 percent of the world's forests are certified through procurement requirements in the *SFI 2015-2019 Standard* requiring that *Certified Program Participants* establish adequate measures to ensure all the fiber they source is from legal and responsible sources, regardless of whether it is from certified or uncertified forests. The *SFI* program meets guidelines on environmental claims in product advertising and communication issued by the U.S. Federal Trade Commission and guidelines on environmental labeling and advertising issued by the Competition Bureau of Canada.

Studies have shown that consumers appreciate the value of forest certification in helping them identify wood and paper products from legal, responsible sources.
The fact that the *SFI* program can deliver a steady supply of fiber from well-managed forests is especially important at a time when there is increasing demand for green building and responsible paper purchasing, and only 10 percent of the world's forests are certified. The American Consumer Council says it supports the good work of the *SFI* program, and applauds the positive and progressive actions it is taking. A poll by TerraChoice Environmental Marketing found that procurement specialists included the SFI label on a list of the top 10 eco-labels they relied on frequently to make buying decisions.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
The SFI Certified Sourcing label should be eliminated or strengthened significantly as it is misleading to 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 forests management fiber content. If the label is kept, it should be redesigned and renamed to more accurately reflect its focus on BMPs and outreach. Also, products produced under other standards should not be granted an SFI label.	The SFI Certified Sourcing label is weak, misleading, and does not promote responsible forestry. The current SFI Certified Sourcing label is misleading to consumers, as it provides no guarantee that fibers were sourced from non-controversial sources. The lack of transparency behind this label provides unnecessary confusion in the marketplace due to the wide range of practices that can be behind the label. These practices 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 solely on outreach and does not provide assurances on responsible forestry, avoidance of controversial sources such as conversion (see the controversial sources section), and fiber legality.	The SFI Certified Sourcing label should be eliminated or strengthened significantly as it is misleading to 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 forests management fiber content. If the label is kept, it should be redesigned and renamed to more accurately reflect its focus on BMPs and outreach. Also, products produced under other standards should not be granted an SFI label.	2	The SFI Review Task Force respectfully disagrees with these comments. The SFI program is the only program globally that addresses sourcing from small, non-certified lands. The requirements of certified sourcing are directed at ensuring among other requirements the use of best management practices, promotion of conservation of biological diversity and the use of Qualified Logging Professionals. The SFI Certified Sourcing Label is clear in that it is not making a claim of certified content. 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. The proposed new requirements regarding pre-consumer fiber is consistent with PEFC. Additionally, the Task Group has enhanced the requirements for the use of the Certified Sourcing label by for Secondary producers. Secondary producers must now meet a threshold level of management systems and avoid of controversial sources. The incorporation of these additional requirements will be addressed as part of the process of restructuring the SFI program into three stand-alone standards.	Refer to SFI 2015-2019 Fiber Sourcing Standard
I think this is very well written. I couldn't have said anything better. Good job.			3	Comment is supportive of the Preface text.	None

PART 1: GENERAL

1.1 Scope

This standard specifies requirements for chain of custody an organization must meet if its claims and or labels used in the products it sells or transfers is to be recognized as credible and reliable.

In this standard, the term organization is used to cover any entity harvesting, handling or processing forest based products at any stage from a forest to a final consumer.

Organizations shall obtain an independent, third-party certification by an SFI certification body to the requirements set out in this standard if they choose to utilize an *SFI chain-of-custody* label or claim. This standard specifies three optional approaches for chain of custody. These are the physical separation method, the average percentage method, and the volume credit method.
This standard specifies the minimum management system requirements for the implementation and management of the chain of custody process. An organization's quality (ISO 9001:2008) or environmental management system (ISO 14001:2004) can be used to meet the minimum requirements for the management system defined in section 4 and to accommodate requirements for the certification process defined in sections 2 or 3.

This standard shall be used together with the requirements specifying the *origin*, which is to be verified by the chain of custody. Usage of labels and claims based on the implementation of this standard shall follow ISO 14020:2000.

The conformity assessment carried out by the third party (third-party certification) is considered as product certification and shall follow ISO/IEC Guide 65:1996 or ISO/IEC 17065:2012. The term "shall" is used throughout this standard to indicate those provisions that are mandatory. The term "should" is used to indicate those provisions which, although not mandatory, are expected to be adopted and implemented.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
If more is added the small organizations will be squeezed out; flattening the system			2	Task Grp has reviewed the comment. Amongst the several factors it considered was the potential to increase costs to *certified program participants* when considering revisions to the standard.	None
May be expensive to track for pellets			3	General comment.	None
Why does SFI have a separate CoC; why not use PEFC CoC? A European based system may strengthen SFI. Two CoCs weaken both.			2	Task Group has reviewed the comment. While SFI is looking at what it can do to align aspects of the SFI CoC with those of PEFC CoC, it is of the opinion that a separate SFI CoC is still needed in the marketplace. SFI staff continue to monitor developments with the PEFC CoC.	None

SFI-CoC is only useful in the US. PEFC-CoC is needed for those working in/with Europe			3	General comment.	None
If and when would SFI get PEFC endorsement?			3	SFI staff are monitoring developments in PEFC CoC. If SFI were to consider endorsement by PEFC of its chain of custody this would need approval by the SFI Board of Directors.	None
Preface – responsibly sourced fiber" and SFI certified wood. Is "responsibly sourced fiber the same as SFI certified fiber?		Remove	3	Responsibly sourced fiber is fiber procured under the Fiber Sourcing Objectives of SFI Section 2 some of which could be *certified sourcing* and some of which could be *certified content.*	None
A primary mill can get SFI CoC without supporting SFI – They get PEFC CoC and then automatically get SFI CoC			3	Comment not correct. Since December 2012 a primary producers with PEFC CoC that uses the SFI label must also be certified to the Fiber Sourcing Objectives 9-21 of SFI Section 2.	None
Multi-site standards need their own section—not buried in different places, such as auditing (Sec. 9).			2	Task Group has reviewed the comment and believes that revised Part 5.6 of the SFI Chain of Custody Standard addresses the comment.	Refer to SFI 2015-2019 Chain of Custody - Part 5.6 Internal Audit and Management Review.

	1) Why can PEFC fiber from outside the U.S. & Canada count as responsible sources for SFI CoC but not for SFI certified source? Likewise, why does PEFC from the U.S. or Canada count as an SFI certified source but PEFC from outside the U.S. and Canada cannot. 2) SFI CoC has not achieved recognition by PEFC; consequently, a secondary manufacturer, SFI & PEFC certified, purchasing SFI input material cannot count that material toward a PEFC label. But one can use PEFC from inside the U.S. & Canada to label as SFI CoC. This needs to be fixed so the brands are mutually exchangeable. SFI should get their CoC endorsed by PEFC.			2	Task Group has reviewed the comment and has the following response: 1) PEFC certified fiber from outside the US and Canada that is supplied with a PEFC COC certificate and a claim can be accepted as having no controversial sources and could be used in a product bearing a Certified Sourcing claim. The only *acceptable forest management standards* recognized as SFI certified forest content are CSA Z809, CSA Z804, ATFS and SFI Section 2010-2014. Therefore PEFC certified content from outside US and Canada is not acceptable as certified forest content though this restriction will continue to be monitored. Should circumstances evolve then SFI will revisit this restriction. 2) SFI has not sought PEFC endorsement of its SFI CoC standard. While SFI is looking at what it can do to align aspects of the SFI CoC with those of PEFC CoC, it is of the opinion that a separate SFI CoC is still needed in the marketplace. SFI staff continue to monitor developments with the PEFC CoC.	None
	A primary mill can be certified to PEFC only, label output as PEFC CoC, use SFI and ATFS inputs, and bypass the SFI Fiber Sourcing requirements, the SFI dues, the SIC dues and the SFI CoC implementation and audit.			3	Comment is correct. The SFI 2010-2104 forest management requirements are identified by PEFC as an acceptable input for the purposes of PEFC chain of custody. However, in this scenario the product is not carrying an SFI label so SFI Inc. does not have any responsibility for the output product.	None

1.2 References

This standard incorporates, by dated or undated reference, provisions from other publications. These normative and informative references are cited at the appropriate places in the text and the publications are listed hereafter. For dated and undated references, the latest edition of the publication applies.

Normative References

i. ISO/IEC Guide 65:1996 General Requirements for bodies operating product certification systems
ii. ISO/IEC 17065:2012 - Conformity Assessment - Requirements for bodies certifying product, process and services
iii. ISO/IEC Guide 2:2004 Standardization and related activities – General vocabulary
iv. ISO 14020:2000 Environmental labels and declarations – General principles
v. Section 2 – *SFI 2010-2014 Stand*ard
vi. Section 4 – SFI-On-Product Label Use Rules
vii. Section 5 – Rules for Use of Off-Product Marks
viii. Section 7 – SFI Legality Requirements and Polices for Avoidance of Illegal Logging Policies
ix. Section 9 - Appendix 1: Audits of Multi-Site Organizations
x. Section 11 – Public Inquiries and Official Complaints

For the purposes of this standard, the relevant definitions given in ISO/IEC Guide 2:2004 and ISO 9000:2005 apply, together with the definitions in the SFI Definitions (Section 13).

Informative References

i. ISO 9000:2005 Quality management systems – Fundamentals and vocabulary
ii. ISO 9001:2008 Quality management systems – Requirements
iii. ISO 14001:2004 Environmental Management Systems – Specification with guidance for use
iv. PEFC ST 2002:2013 Chain of Custody of Forest Based Products - Requirements, May 24 2013
v. Section 9 – SFI 2010-2014 Audit Procedures and Auditor Qualifications and Accreditation
vi. Section 13 – SFI Definitions

PART 2: REQUIREMENTS FOR CHAIN OF CUSTODY PROCESS - PHYSICAL SEPARATION METHOD

2.1 General Requirements for Physical Separation

2.1.1 The organization applying the physical separation method shall ensure that the *certified forest content* is separated or controlled to ensure it is not mixed with or replaced by uncertified content.

2.1.2 The organization, whose *certified forest content* and recycled content inputs are not mixed with other raw material, should use physical separation as the preferred option.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
Inclusion of pre-consumer recycled content in possible certified sources gives recognition to the positive aspects of utilizing pre-consumer, rather than diverting to a landfill. This is a value-add change.			3	Comment is supportive of the decision to include pre-consumer recycled content in the certified content calculation.	None

2.2 Identification of the Origin

2.2.1 Identification at Delivery Level The organization shall identify and verify the category of the *origin* of all procured raw material. Documents and/or verifiable information associated with the source and/or delivery of raw material shall include at least:
a. supplier identification,
b. quantity of delivery,
c. date of delivery / delivery period / accounting period,
d. Category of *origin*
i. SFI *Certified Forest Content*
ii. SFI Certified Sourcing
iii. *Post-Consumer Recycled*
iv. *Pre-Consumer Recycled*
v. *SFI Recycled Conten*t; and
e. The supplier's chain of custody number, if applicable.
This information can be documented in the form of, but not limited to, an invoice, bill of lading, shipping document, letter, or other forms of communications between the organization and the next entity in the supply chain.

Note 1: The categories of the *origin* of raw material are specified in the SFI Definitions (Section 13). Note 2: An organization (e.g. printer or lumberyard) that uses the physical separation method and sources inputs from a suppler that uses the percentage-based method must know the percentage of certified *content* if it wants to label products or make claims about them.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
How far down supply chain do you need documentation? Clarify			3	Certified Program Participant buying the input materials must obtain the required information as per 2.2.1 from the direct supplier.	Refer to SFI 2015-2019 Chain of Custody Standard part 2.2.1.
Inclusion of pre-consumer recycled content in possible certified sources gives recognition to the positive aspects of utilizing pre-consumer, rather than diverting to a landfill. This is a value-add change.			3	Comment is supportive of the decision to include pre-consumer content in certified content calculation.	None

2.2.2 Identification at Supplier Level

The organization shall obtain or access confirmation documentation for all suppliers of the *certified forest content,* which proves that the criteria set for the supplier have been met.

2.3 Separation of the Certified Content

Certified content shall remain clearly identifiable throughout the entire sourcing production, trading and sales process. This shall be achieved by:

a. physical separation in terms of production and storage space or;
b. physical separation in terms of time or;
c. permanent identification of the *certified content* with verification of how it is controlled during the production, trading, and sales process to ensure it is not mixed with or replaced by uncertified material.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
It is impossible for the certified content to remain "clearly identifiable throughout the production." This has caused auditor problems. A change was made, but does not resolve problem.	New words were added to 2.3.c. which links it to permanent identification. They should be separate, creating a 2.3.d.	2.3.d - "verification of how it is controlled during the production process to ensure it is not mixed with or replaced by uncertified material."	2	Task Group has considered the comment and believes that the new requirement at 2.3.2 addresses the comment.	Refer to SFI 2015-2019 Chain of Custody – 2.3.2.

2.4 Sale of Certified Content Products

2.4.1 At the point of sale or transfer of the certified products to another entity, the organization shall provide the next entity in the chain with written information confirming the supplier's certification status and an official SFI claim statement providing a clear indication of input category. This can be in the form of, but not limited to, an invoice, bill of lading, shipping document, letter, or other forms of communications available to the customer at the time of the sale of the product.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
'' confirming hte supplier's '' should have ''the''.	Spelling mistake.	confirming the supplier's	1	Edit made.	None

2.4.2 The organization shall ensure that documentation of the certified products clearly states at least the following information:

a. organization's identification,
b. quantity of delivery,
c. date of delivery / delivery period / accounting period,
d. an official *SFI claim,*
  i. SFI X% Certified Forest Content
  ii. SFI X% Recycled Content
  iii. SFI X% pre-consumer recycled
  iv. SFI X% post-consumer recycled
  v. SFI X% Certified Sourcing
  (Note: Percentages of any combination of the above are permissible.)
  vi. SFI at Least X% Certified Forest Content
e. The organization's chain of custody number.

Note: The categories of the origin of raw material are specified in the SFI Definitions (Section 13).

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
Part 2.4.2.d Official SFI claims, Note: *Percentages of any combination of the above are permissible.* Unclear what "any combination is permissible".			2	Task Group has reviewed the comment and is of the opinion that the requirement is clear.	Refer to SFI 2015-2019 Chain of Custody Standard part 2.4.2 d.
Why is "at least x%" restricted to only for this section?	Make this consistent with PEFC and just use % claims.		2	The Task Group is still considering options regarding threshold percentages when making claims on products. To assist with this review SFI continues to monitor developments with PEFC claims and logo use.	None
Why offer this option at all?	Remove the option to use "at least x%" to be more consistent with PEFC		2	The Task Group is still considering options regarding threshold percentages when making claims on products. To assist with this review SFI continues to monitor developments with PEFC claims and logo use.	Refer to SFI 2015-2019 Chain of Custody Standard part 2.4.2 d.
Terms are too similar. Customers don't understand the difference	Use "SFI wood procurement"		2	Task Group has reviewed the comment but does not believe the suggested change to the Certified Sourcing claim enhances acceptance of products carrying this claim.	None
Can you align the claims to PEFC COC standard PEFC ST 2002:2013 please?	Simplification of claims will make the standard more accessible and user friendly. Aligning SFI standard with PEFC will stimulate the trade of certified products between North America and Europe.	Please use just two claims "XX% SFI certified" "SFI Controlled Sources"	2	Task Group has reviewed the comment but is of the opinion that going to just two claims will not enhance transparency for those products carrying SFI claims.	Refer to SFI 2015-2019 Chain of Custody Standard part 2.4.2 d.
Will the revised set of SFI claims for input materials create a change to the verbiage that is required to be on our paperwork (packlists and invoices)?	We are limited to 40 characters for this field	none	3	General comment concerning limited space for claims/text on invoices, etc. Task Group acknowledges that this is a concern but it cannot involve itself with business decision such as the software used to generate invoices.	None
As currently written, the language implies that the organization shall have on all sales documentation all of the listed items (a-e) by virtue of the language "at least" in the standard. This is not what we understand the intent of the standard to be; rather, we understand the intent to be that the listed items (a-e) should be included on sales documentation when appropriate.	To provide clarification of intent of several aspects of this section.	2.4.2. The organization shall ensure that documentation clearly states at least the following information: (a) organization's identification; (b) quantity of delivery; (c) date of delivery/delivery period/accounting period; (d) an official SFI claim which may consist of the following options i. SFI X% Certified Forest Content ii. SFI X% Recycled Content iii. SFI X% pre-consumer recycled iv. SFI X% post-consumer recycled v. SFI X% Certified Sourcing; (Note: Percentages of any combination of the above are permissible.) vi. SFI at Least X% Certified Forest Content; and (e) The organization's chain of custody	2	The Task Group has reviewed the comment but is unclear regarding the suggested change as the use of "at least" in Part 2.4.2 is existing language.	Refer to SFI 2015-2019 Chain of Custody Standard part 2.4.2 d.

			number.			

2.4.3 If the organization uses the logo or label, both on-product and off-product usage shall be carried out according to the terms and conditions of the Office of Label Use and Licensing and the Rules For Use of SFI On-Product Labels and SFI Off-Product Marks (Sections 4 and 5) in the SFI requirements document.

	Comment	**Rationale for proposed change**	**Proposed new language**	Comment Review	Rationale	Revised or Proposed New language
	OR "SFI fiber sourcing"			3	Task Group does not understand the comment.	None
	AND change the logos to help distinguish between the two			3	Task Group does not understand the comment – there are more than two SFI logos.	None

PART 3: REQUIRMENTS FOR CHAIN OF CUSTODY PROCESS - MIXING OF INPUTS - AVERAGE PERCENTAGE METHOD AND VOLUME CREDIT METHOD

3.1 General Requirements for Mixing of Inputs

3.1.1 Application of Mixing of Inputs The percentage-based method applies to organizations with facilities where *certified content* is mixed with non-certified forest inputs that cannot be clearly identified in the output products.

3.1.2 Definition of the Product Group

3.1.2.1 The organization shall implement the requirements for the chain of custody
process of this standard for the specific product group.

3.1.2.2 The organization shall identify its product group(s) based on the following criteria:
a. raw material included in the products covered by the product group,
b. production site at which the products covered by the product group have been produced,
c. time period over which the products covered by the product group have been produced or sold/transferred.

3.1.2.3 The product group shall be associated with (i) a single product or (ii) a group of products, which consist of the same or similar input raw material based on, for example, species, sort or substitutability within products (e.g. SPF lumber contains multiple tree species but may be treated as a single product group).

3.1.2.4 The organization shall identify an entity within the organization for which the product group is defined and only products produced or controlled by that entity shall be included within the product group.

Note: the entity may be a standalone manufacturing facility, a forest contractor with multiple harvest sites, a trader or distributor with multiple suppliers, a remanufacturing facility supplied by multiple primary manufacturers or a centralized sales department within an organization with responsibility for multiple manufacturing units.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
Does it eliminate pooling credits? Clarify			3	The ability to aggregate credits is not affected by this requirement.	None

3.1.2.5 For credibility purposes of the product group, the maximum claim period for calculating the percentage is three months.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
Why is this restricted to 3 months? Some projects take longer, particularly those related to LEED	Remove the "three month" restriction, use instead "is the amount of time the job takes"		2	Task Group has reviewed the comment but believes that use of the physical separation method would address the comment. Group believes that	Refer to SFI 2015-2019 Chain of Custody Standard part 3.2.5.

					restricting the maximum claim period to 3 months aligns the SFI COC with the PEFC CoC requirement which is also 3 months.	

3.1.2.6 The organization shall identify all products included in the product group covered by the chain of custody claim period so it is possible to determine the product group to which the products belong. The identifier can be a unique number or a name that all products within the product group belong to.

Note: Physical on-product identification of the product group is not required if the certification percentage is applied to sold or transferred products as the product group identification is evident from the sale or delivery documents. However, products that carry the SFI on-product label must be accompanied by the associated claim statement.

3.2 Identification of the Origin

3.2.1 Identification at Delivery / Receipt Level The organization shall identify and verify the category of *origin* of all procured raw material that is received. Associated documents with delivery and reciept of raw material shall include at least:

a. supplier identification,
b. quantity of delivery,
c. date of delivery / delivery period / claim accounting period,
d. Category of *origin*
   i. SFI Certified Forest Content
   ii. SFI Certified Sourcing
   iii. Post-Consumer Recycled
   iv. Pre-Consumer Recycled
   v. SFI Recycled Content
e. The supplier's chain of custody number if applicable.

This information can be documented in the form of, but not limited to, an invoice, bill of lading, shipping document, letter, or other forms of communications between the organization and the customer. Note: The categories of the *origin* of raw material are specified in the SFI Definitions (Section 13) in the SFI requirements document.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
Align the category of origin to PEFC ST 2002:2013.	To make the standard more accessible and recognizable by PEFC Certificate Holders in Europe.	"Category of origin" changed to "material category": certified, other and neutral	2	Task Group has reviewed the suggested revision but has decided to retain the use of the term category of *origin* as it is a defined term and its usage is well understood by SFI chain of custody certificate users.	None

The inclusion of pre-consumer recycle fiber is very positive	Allows a gateway to lower recycle costs and avoid unnecessary disposal of available, high quality fiber sources	none	3	Comment is supportive of inclusion of pre-consumer recycled in certified content calculation.	None
Inclusion of pre-consumer recycled content in possible certified sources gives recognition to the positive aspects of utilizing pre-consumer, rather than diverting to a landfill. This is a value-add change.			3	Comment is supportive of inclusion of pre-consumer recycled in certified content calculation.	None

3.2.2 Identification at Supplier Level

The organization shall obtain or access confirmation for all suppliers of the *certified content* documentation, which proves that the criteria set for the supplier have been met.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
As written, the standard implies that we need to verify from our suppliers of certified content that each contributor to their supply chain is certified. Our direct supplier's certification should be sufficient to guarantee integrity through their supply chain. Additionally, the language is inconsistent with certified content sourcing verification language in other chain of custody standards.	Clarify intent of the standard and bring into harmony with other standards.	3.2.2 Identification at Supplier Level. The organization shall verify the validity and scope of the forest management certificate or chain of custody certificate or other documentation confirming the supplier's certified status from all suppliers of certified material. The organization, in addition to evaluating documents received from the supplier, may also validate the claims using publicly available registers of suppliers of certified materials.	2	Task Group has reviewed the comment and believes that the revised 3.3.2 addresses the comment.	Refer to SFI 2015-2019 Chain of Custody Part 3.3.2.

3.3 Calculation of the Certified Percentage

3.3.1 The organization shall calculate the certification percentage separately for each product group according to the following formula:

$$Pc\ [\%] = \frac{Vc}{Vc + Vo} \cdot 100$$

Pc Certification percentage
Vc *Certified content*
Vo Other raw material

Note: When making claims about pre and post-consumer recycled content, both can count as certified content and the amount must be disclosed to the customer. For organizations choosing not to count pre and post-consumer recycled content, the pre and post-consumer recycled content is neutral and shall not be included in the calculation of the certified content percentages in chain of custody tracking.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
No other CoC requires identification of recycled content to customers; this creates logistical challenges. Why are we doing this?			2	Task Group has reviewed the comment but is of the opinion that for maximum transparency the presence of recycled content should be disclosed to the customer.	None
I agree with the decision to allow pre and post-consumer recycled content to count as certified content.			3	Comment is supportive of the decision to include post-recycled content in the calculation of certified content.	None

The "Note" can be interpreted to mean that pre and post-consumer recycled content must be independently identified to the customer if it is to be included in "certified content." Neither PEFC nor FSC requires that these be independently reported/identified; rather, they allow for all recycled content (pre- and post-) to be lumped into one sum. This is what we believe the intent of the SFI standard is; however, as written, this is not clear. We suggest this language be modified to be consistent with existing PEFC and FSC requirements.	Clarifies the intent which is not to independently identify pre- and post- consumer content to the customer but rather, to indicate what volumes can be included in the total certified volume (pre-consumer, post-consumer, virgin material).	3.3.1 The organization shall calculate the certification percentage separately for each product group according to the following formula: formula. NOTE: When making specific claims about pre- and post-consumer recycled content, both can count as certified content and the amount of certified content (sum of pre- and post- consumer recycled and virgin material) must be disclosed to the customer. For organizations choosing not to count pre- and post-consumer recycled content, the pre- and post-consumer recycled content is neutral and shall not be included in the calculation of the certified content percentages in chain of custody tracking.	2	Task Group has reviewed the comment and believes that the Note in Part 3.4.1 addresses the comment.	Refer to Part 3.4.1 of the SFI 2015-2019 Chain of Custody

3.3.2 The organization shall calculate the certification percentage based on a single measurement unit used for all raw material covered by the calculation. The organization shall use only official conversion ratios and methods. If a suitable official conversion ratio does not exist, the organization shall define and use a reasonable and credible internal conversion ratio. (Note: The Conversion Factor/Ratio is calculated by dividing the output (volume or weight) by the input (volume or weight) and is applied to each individual input component of a product group.)

3.3.3 If the procured raw material includes only a proportion of *certified content*, then only the quantity corresponding to the actual certification percentage claimed by the supplier can enter the calculation formula as *certified content*. The rest of that raw material shall enter the calculation as other raw material.

3.3.4 The organization shall calculate the certification percentage either as a simple or
rolling average percentage. Refer to Appendix 1 of this document for the definitions of simple and rolling average calculations.

3.3.5 The organization applying the simple certification percentage shall base the calculation of Pc (the certification percentage) for each product group on the figures for Vc (*certified content*) and Vo (other raw material) for that specific production batch. As a result, it is necessary for the organization applying this method to know the percentage of *certified content* before any product of the product group is sold or transferred. The product group shall not exceed three months of production.

3.3.6 The organization applying the rolling average certification percentage shall base the calculation of Pc (the certification percentage) for each claim period on the figures for Vc (*certified content*) and Vo (other raw material) for a specified number of prior claim periods(excluding the current production batch). The time period covered by the specified number of prior claim period shall not exceed 12 months.

3.4 Transfer of the Calculated Percentage to the Outputs

3.4.1 Average Percentage Method The organization applying the average percentage method can label all the products covered by the claim period, provided that the percent of *certified content* is clearly communicated on the SFI label. In addition, the actual percentage of *certified forest content* must be communicated to the customer per 3.6.2.d.

When the label is being applied on products with the "At Least X%" expression in the label, the claim must read, "Product Group Contains At Least X% Certified Forest Content." See Section 4

— *SFI On-Product Label Use Rules* for further guidance.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
Do all the percentages have to equal 100%. If yes, where do conversion sources get included?			3	Calculation would total 100% but conversion sources would not be in the calculation as per definition of controversial sources.	None

3.5 Volume Credit Method

3.5.1 The organization shall apply the volume credit method for a single claim. The organization receiving a single delivery of material with more than one claim relating to the category of origin shall either use it as a single inseparable claim (eg. SFI/PEFC certified content) or shall only use one from the received claims (SFI or PEFC certified) for calculating the volume credits. The volume credit shall be distributed to the output products from the volume credit account in a way that all products sold as certified are sold as 100% certified.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
The revisions made to this section eliminate the capacity of an organization to, when using the volume credit method, pass along anything other than 100% certified. This is not how the standard has operated historically. We suggest returning to the former intent and language. It is not clear why this section was revised (it was not revised to comply with PEFC, as PEFC allows for 70% minimum).	Return to existing language to avoid unnecessarily forcing organizations to modify practices.	3.5.1 The organization applying volume credit shall recognize volume credits in the single measurement unit used for all raw material inputs. Volume credits shall be transferred to a volume credit account based on the amount of certified raw material used in each production batch. The amount of material considered certified can be calculated by using either the simple average or rolling average method. Note: If the certification percentage for the production batch is 54% then the amount of the output that can be sold as SFI chain-of-custody certified product is the amount of output that would be produced by 54% of the input raw material. The label used for this method as follows: label.	2	Task Group has reviewed the comment and has decided to retain the requirement that claims made with the Volume Credit method must be made at the 100% level.	Refer to SFI 2015-2019 Chain of Custody Standard part 3.6.1.

"The volume credit shall be distributed to the output products from the volume credit account in a way that all products sold as certified are sold as 100% certified." This is an important clarification that should stay in the final version of the standard.			2	Comment is supportive of keeping the Volume Credit claim at 100% and not less than 100%. Task Group is still reviewing whether to consider this approach to making claims under the Volume Credit method.	Refer to SFI 2015-2019 Chain of Custody Standard part 3.6.1.

3.5.2 The organization shall recognize volume credits in a single measurement unit used for all raw material inputs and shall enter the volume credits into the credit account. The credit account may be established for individual product types of the product group or for the whole product group where the same measurement unit is applied to all product types.

3.5.3 The organization shall calculate the volume credits using either:
(a) certification percentage (from section 3.3) and volume of output products (clause 3.5.4) or
(b) input material (certified forest content / pre-consumer recycled / post-consumer recycled) and input/output ratio (clause 3.5.5).

3.5.4 The organization applying the certification percentage shall calculate the volume credits by multiplying the volume of output products of the product group by the certified percentage.

Example: If there are 100 tons of a product, and 54% of the total output is *certified forest content*, then the organization can make a volume credit claim on 54 tons of the output.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
The addition of an example is very helpful and adds a lot of clarity to the use of the volume credit method.			3	General comment.	None

3.5.5 The organization must demonstrate a verifiable ratio between the input material and output products. The volume credits may be calculated directly from the input certified material by multiplying the volume of the input certified material by the input/output ratio and accounting for manufacturing losses.

Example: If the organization receives 500 mbf of input material with a claim of “70% SFI Certified Content” the amount of certified credits and the verifiable input/output ratio (including manufacturing losses) is 0.60 (e.g. 1 mbf of round wood results in 0.60 mbf of lumber), the organization achieves volume credits equal to 210 mbf of lumber.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
The addition of an example is very helpful and adds a lot of clarity to the use of the volume credit method.			3	General comment.	None

3.5.6 The label used for the Volume Credit method shall be follows.

Proposed Labels

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
Volume credit label – will the "promoting sustainable forestry" label be just for virgin fiber, now that there is one that can be used with recycled fiber?			3	General comment – response to question is yes.	None
Is the label "recycled content" on it mean it is virgin wood?			3	No – *recycled content* is defined *as pre-consumer recycled content and post-consumer recycled content.*	None

3.5.7 The organization can accumulate the SFI Certified Credits or Recycled Credits by creating a volume credit account, which can be used for the next claim period.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
SFI should ensure that the concept of recycled credits is consistent with EPA Green Guides.			3	SFI Inc. monitors closely developments with FTC Green Guides to ensure that any SFI claims/labels align with their requirements.	None

3.5.8 The total quality of credits cumulated at the credit account cannot exceed the sum of credits entered into the credit account during the last 12 months.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
Typo "quality" should be quantity		The total quantity of credits cumulated at the credit account cannot exceed the sum of credits entered into the credit account during the last 12 months	1	Edit has been made.	None

3.6 Sale of Products

3.6.1 At the point of sale or transfer of the certified products to the next entity in the supply chain, the organization shall provide customers with written information confirming the supplier's certified status and an official SFI claim statement. This can be in the form of, but not limited to, an invoice, bill of lading, shipping document, letter, or other forms of communications available to the customer at the time of the sale of the product.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
Organization or suppliers? Clarify it is organization.			2	Task Group has reviewed the comment but does not believe that he requirement is unclear.	Refer to SFI 2015-2019 Chain of Custody – Part 3.7.1

3.6.2 The organization shall ensure that documentation of the certified products clearly states at least the following information:

a. organization's identification,
b. quantity of delivery,
c. date of delivery / delivery period / claim period
d. an official *SFI claim* statement:
    i. SFI *Certified Content* - 100% as calculated under the volume credit method
    ii. SFI *Recycled* Content - 100% as calculated under the volume credit method.
e. The organization's chain of custody number.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
Do we need a third claim for 75% recycled, 25% virgin?			2	Task Group has reviewed the comment but doesn't believe that an additional claim as proposed would add clarity.	None
Too much wording required on the label	Remove "as calculated under the", use instead "100% by volume credit method"		2	Task Group is cognisant of having legible labels and has tried to ensure clarity without having too much text on the label.	None
Not a lot of space for all of this text in a bill of lading – too precise. While great to have precision, it's easy to go over board	SFI certified content 100% volume credit method. Remove as calculated under…..		2	Task Group is cognisant of having legible labels and has tried to ensure clarity without having too much text on the label.	None

As currently written, the language implies that the organization shall have on all sales documentation all of the listed items (a-e) by virtue of the language "at least" in the standard. This is not what we understand the intent of the standard to be; rather, we understand the intent to be that the listed items (a-e) should be included on documentation when appropriate. There is an implication in d (i) that this claim statement can apply only to virgin material and not to products that contain combinations of virgin, pre- and post-consumer recycled materials. We do not believe this was the intent. We understand the intent to be that d (i) is the claim statement that encompasses both virgin products and products that contain combinations of virgin, pre-consumer recycled and post-consumer recycled materials. We do not have suggested language changes, but would like the committee to consider how this might be clarified. Finally, the claim statements are not consistent with claim statement allowances in the PEFC standard. PEFC allows for an SFI/PEFC statement. However, given the options provided in this section [d (i-ii)], it is unclear what should occur if someone wants to provide an SFI/PEFC claim statement on documentation. It is important to synchronize the PEFC and SFI claim statement requirements.	To provide clarification of intent of several aspects of this section.	3.6.2. The organization shall ensure that documentation of the certified products clearly states some or all the following information, as appropriate and necessary for the sale: a. Organization's identification; b. Quantity of delivery; c. Date of delivery/delivery period/period claim; d. An official SFI claim statement: i. SFI Certified Content – 100% as calculated under the volume credit method. ii. SFI Recycled Content – 100% as calculated under the volume credit method; and e. The organization's chain of custody number.	2	The Task Group has reviewed the comment but is unclear what the suggested change is as the use of "at least" in 2.4.2 is existing language.	Refer to SFI 2015-2019 Chain of Custody Standard part 2.4.2 d.

3.6.3 If the organization uses the logo, both on-product and off-product usage shall be carried out according to the terms and conditions of the *Office of Label Use and Licensing* and the Rules for Use of SFI On-Product Labels and SFI Off-Product Marks (Sections 4 and 5 in the SFI requirements document).

3.7 Process to Avoid Controversial Sources

3.7.1 Process to *Avoid Controversial Sources*

When raw materials are supplied without a SFI chain of custody claim and valid certificate or *other credible chain of custody standard* claim and valid certificate the organization shall establish adequate measures to ensure that the certified products do not include raw material from *controversial sources*. Use of *controversial sources* is not allowed in SFI-labeled products. *Controversial sources* include forest activities which are not in compliance with applicable state, provincial or federal laws, particularly as they may relate to:

- legally required protection of threatened and endangered species
- requirements of CITES (The Convention on International Trade in Endangered Species of Wild Fauna and Flora)
- legally required management of areas with designated high environmental and cultural values,
- labor regulations relating to forest workers
- indigenous peoples' property, tenure and use rights

Fiber sourced from *illegal logging* and fiber sourced from *areas without effective social laws are also controversial sources*.
Note: *Conversion sources* cannot be included when calculating *certified forest content.*

For all raw materials supplies without a SFI (or *other credible chain of custody standard)* chain of custody claim and valid certificate the organization shall:

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
Part 3.7. The format is not consistent with other parts.	Reformat to be consistent.		2	The task group has reviewed the comment and believes that the revised Part 4 – Due Diligence System for Avoidance of Controversial Sources addresses the comment.	Refer to Part 4 – SFI 2015-2019 Chain of Custody
Definition "controversial sources". The definition is not flexible, doesn't allow for the reality (i.e., trees from road building).	Broaden the definition to allow for things like trees from road building on certified lands would be considered certified.		2	Task Group has reviewed the comment and believes the comment is confusing forest management access structures with conversion. Trees harvested during the course of planned forest management activities (road construction, log processing areas, etc.) are not considered conversion and therefore not controversial sources.	Refer to SFI 2015-2019 Forest Management Standard PM 1.2 and 1.3 and SFI Section 6 – Guidance
Right now you need a claim and a certificate. This could be problematic for landowner only. Need a solution to ensure the landowner is providing proper claim.			2	Tasks Group has reviewed the comment and has revised Part 3.3.1 to include a new category of *origin* – SFI Certified Forest Content. The Task Group believes that this revision addresses the comment.	Refer to SFI 2015-2019 Chain of Custody - Part 3.3.1
The SFI standard would benefit from having a Due Diligence System aligned with Clause 5 PEFC COC standard PEFC ST 2002:2013	Knowing that US Lacey Act and EU Timber Regulation is in force PEFC Certificate Holders in Europe will more likely source the timber from North America if it is compliant with PEFC standard and so with EUTR.	Re-engineer the whole section according to Clause 5 from PEFC ST 2002:2013.	2	Task Group has reviewed the comment and believes that the due diligence system which is now Part 4 of the SFI Chain of Custody addresses the comment.	Refer to SFI Chain of Custody - Part 4.
The current SFI CoC Standard for 3.6 was applicable only for fiber sources outside the US and Canada.	A strong legal and regulatory framework is in place in the United States and Canada. In addition, there is ample evidence in these countries to prove low risk associated with sourcing fiber from these controversial sources.	3.7.1 Process to Avoid Controversial Sources When raw materials outside the United State and Canada are supplied without a SFI chain of custody claim and valid certificate or other credible chain of custody standard claim and valid certificate the organization shall establish adequate measures to ensure that the certified products do not include raw material from controversial sources. Use of controversial sources is not allowed in SFI-labeled products. Controversial sources include forest activities which are not in compliance with applicable state, provincial or federal laws, particularly as they may relate to:	2	Task Group has reviewed the comment and believes that the due diligence system which is now Part 4 of the SFI Chain of Custody addresses the comment. Note that the due diligence system is applied to all sources of fiber that are not certified to SFI, CSA Z809, ATFS or CSA Z804.	Refer to SFI 2015-2019 Chain of Custody - Part 4.
3.7.1 states that controversial sources are not allowed in SFI-labeled products, and ignores the fact that not all certified products carry the label.	All certified products need to comply with this, not just those carrying the label.	Replace "SFI-labeled products" with "SFI-certified products."	2	The Task Group has revised the process to address controversial sources and this text does not appear in the new Part 4 of the SFI Chain of Custody Standard.	Refer to SFI 2015-2019 Chain of Custody - Part 4.

As currently written, this requirement reads as an absolute as opposed to a due diligence requirement. In so doing, it is inconsistent with other standards. It also implies that an organization should focus on compliance with some laws more than others. This is, obviously, not how laws in North America are structured – an organization must comply with all laws without placing particular emphasis on some. We understand the intent to be for this section to address EUTR requirements and requests that are received from European customers that want verification that particular issues/laws are complied with by a company. Finally, some elements of this section are either a) impossible to implement/enforce and/or b) already covered in other parts of the standard and are simply redundant to have here, too.	Bring into alignment with other standards that address the avoidance of controversial sources. Clarify language around compliance with existing legal frameworks.	3.7.1 When raw materials are supplied without a SFI chain of custody claim and valid certificate or other credible chain of custody standard claim and valid certificate the organization shall establish adequate measures to minimize the risk that the certified products include raw material from controversial sources. Controversial sources include products derived from illegal timber and fiber sourced from areas without effective social laws are also controversial sources. NOTE: Conversion sources cannot be included when calculating certified forest content. (Refer to Section 2. Performance Measure 1.2) For all raw materials supplied without a SFI (or other credible chain of custody standard) chain of custody claim and valid certificate the organization shall:	2	Task Group has reviewed the comment and believes that the due diligence system which is now Part 4 of the SFI Chain of Custody addresses the comment. Note that the due diligence system is applied to all sources of fiber that are not certified to SFI, CSA Z809, ATFS or CSA Z804.	Refer to SFI 2015-2019 Chain of Custody - Part 4.
Conversion sources cannot be included when calculating certified forest content. The forest products community has no control when a forest landowner decides to convert his forest to a shopping mall. What about landowners That convert agricultural lands to forest lands. These are conversion the forestry community has no control over either. One is beneficial to forestry and the other is not.		This note should be excluded.	2	Task Group has reviewed the comment and believes that the new requirements in SFI 2015-2019 Performance Measure 1.3 and the corresponding guidance in Section 6 – Guidance address the concern highlighted in the comment.	Refer to SFI 2015-2019 Forest Management Standard Performance Measure 1.3 and SFI Section 6 – Guidance.
Please clarify if conversion sources are considered controversial sources. The inclusion of conversion sources within the definition of controversial sources here leads one to believe that 3.7.1.1-3.7.1.2 apply to conversion sources. While conversion sources are not allowed to be counted in labeled products, this seems to imply that a company needs to require a signed declaration from a supplier which includes the avoidance of conversion sources	Clarification needed on requirements around conversion sources	Remove conversion sources from the controversial sources definition and clarify the expectations of conversion sources vs controversial sources Clarify whether Section 3.7 applies to all CoC holders or just those that label products	2	Task Group has reviewed the comment and concurs. Note has been removed from the revised definition of *controversial sources*.	Refer to SFI 2015-2019 Chain of Custody – Part 4 Due Diligence System and Section 13 – Definitions
The process to avoid controversial sources needs to explicitly include Forests with Exceptional Conservation Value.	There should be an assurance that fiber sourced without a SFI chain of custody claim and valid certificate or other credible chain of custody standard claim and valid certificate does not originate from FECV. Otherwise certified program participants will not be able claim that all the fiber they source is from legal and responsible sources, regardless of whether it is from certified or uncertified forests.	Fiber sourced from Forests with Exceptional Conservation Value, from illegal logging, and from areas without effective social laws are also controversial sources.	2	Task Group has reviewed the comment and is of the opinion that the revised *controversial sources* definition, with its requirement for protection of threatened and endangered species and areas with designated high environmental and cultural values, addresses the comment	Refer to SFI 2015-2019 Chain of Custody – Part 4 Due Diligence System and Section 13 – Definition
Need to adopt PEFFC approach re. exempting pre and post-consumer recycled from requirement for a controversial sources analysis.			2	Task Group has reviewed the comment and concurs – Part 4.3 has been revised to exempt *recycled content* from the requirement for a *controversial sources* assessment.	Refer to Refer to SFI 2015-2019 Chain of Custody – Part 4.3 Conducting a Risk Assessment and Section 13 – Definition

Requires change to allow for raw materials sourced directly from SFI certified sources.	The language is required for secondary materials such as market pulp or veneer. But, since logs from certified forests are received without any "claim" under SFI a change is necessary.	In some other section, make a statement that sales directly from a certified SFI forest constitutes a "claim".	2	Tasks Group has reviewed the comment and has revised Part 3.3.1 to include a new category of *origin* – SFI Certified Forest Content. The Task Group believes that this revision addresses the comment.	Refer to SFI 2015-2019 Chain of Custody - Part 3.3.1

3.7.1.1 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.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
What is declaration? Clarify that a sale of products from certified land base constitutes a valid claim			2	Tasks Group has reviewed the comment and has revised Part 3.3.1 to include a new category of *origin* – SFI Certified Forest Content. The Task Group believes that this revision addresses the comment.	Refer to SFI 2015-2019 Chain of Custody - Part 3.3.1

3.7.1.2 Evaluate the potential risk of procuring raw material from *controversial sources* and establish a program to check a sample of self-declarations by suppliers, using a second- or third-party verification.
Note: The potential risk evaluation carried out by the organization should be based on the regional/country level.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
PEFC allows up to 35% non-certified content under logo. Is SFI requiring a due-diligence on the non-certified content?			3	All non-certified content is subject to the requirement for a *controversial sources* risk assessment for all non-certified content.	Refer to SFI 2015-2019 Chain of Custody – Part 4 Due Diligence System and Section 13 – Definition
SFI should provide guidance on what constitutes an acceptable program for checking a sample of supplier self-declarations. Also a definition of second-party verification should be included in the SFI Definitions.	To ensure Certifying Body audits of this Subpart are consistent.		2	Task Group has reviewed the comment and is of the opinion that SFI Section 9, para. 5.1.2 (e) could be used to determine the parameters for sampling self-declarations	Refer to Section 9 – Audit Procedures and Qualifications.

3.7.1.3 Ensure procurement from areas outside the United States and Canada promote the *conservation* of *biodiversity hotspots* and *high-biodiversity wilderness areas*.

3.7.1.4 Develop a process with direct suppliers to promote the principles of sustainable forestry.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
Part 3.7.1.4 and 3.7.1.5: Inconsistent with the Standard; they may set a higher bar than the Standard.	Make consistent language between the standard and CoC.		2	The Task Group has reviewed the comment and believes that Part 4 of the SFI Chain of Custody addresses the comment.	Refer to SFI 2015-2019 Chain of Custody – Part 4 Due Diligence System.
This sounds a lot like the requirements in the Forest Land Management and Fiber Sourcing Objective #18 - Community Involvement and Landowner Outreach in the Practice of Sustainable Forestry. SFI should	Potentially overlapping requirements. To ensure Certifying Body audits of this Subpart are consistent.		3	Comment addressed by the Fiber Sourcing Task Group. This requirement has been removed from the SFI 2-15-2019 Chain of	Refer to SFI 2015-2019 Fiber Sourcing Standard PM 11.1.

provide guidance on what constitutes an acceptable program for developing a process with direct suppliers for promoting principles of sustainable forestry so that Certifying Body audits of this Subpart are consistent.				Custody Standard.	

3.7.1.5 Ensure it knows whether direct suppliers are applying the principles of sustainable forestry.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
This sounds a lot like the requirements in the Forest Land Management and Fiber Sourcing Objective #18 - Community Involvement and Landowner Outreach in the Practice of Sustainable Forestry. SFI should provide guidance on what constitutes an acceptable program for developing a process with direct suppliers for promoting principles of sustainable forestry so that Certifying Body audits of this Subpart are consistent.	This sounds a lot like the requirements in the Forest Land Management and Fiber Sourcing Objective #18 - Community Involvement and Landowner Outreach in the Practice of Sustainable Forestry. SFI should provide guidance on what constitutes an acceptable program for developing a process with direct suppliers for promoting principles of sustainable forestry so that Certifying Body audits of this Subpart are consistent.		3	Comment addressed by the Fiber Sourcing Task Group.	Refer to SFI 2015-2019 Fiber Sourcing Standard PM 11.1.

3.7.1.6 Have a process in place to assess the risk of fiber from countries without effective social laws addressing the following:

i. workers' health and safety;
ii. fair labor practices;
iii. indigenous peoples' rights;
iv. antidiscrimination and anti-harassment measures;
v. prevailing wages; and
vi. workers' right to organize.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
Definition of "controversial sources" - Too narrow to just Indigenous Peoples' "property, tenure and use rights"	Remove "indigenous", use "other peoples'"		3	Task Group has reviewed the comment. The *controversial sources* definition is specific in stating I*ndigenous Peoples. T*his is in recognition of the ILO Convention 169 & UNDRIP which is a requirement of the PEFC endorsement of the SFI Section forest management requirements.	Refer to SFI 2015-2019 Chain of Custody – Part 4.1.

Based on the definition of 'fiber sourced from areas without effective social laws', the US and Canada have strong legal frameworks and don't fall into this category.	From this definition it appears that an organization would not be required to do a fiber risk assessment if all fiber procured is sourced from within the US and Canada.	If an organization's fiber risk assessment demonstrates that no fiber is being procured from countries without effective social laws, sections 3.7.1.6, 3.7.1.7 & 3.7.1.8 become Not Applicable.	3	The comment is incorrect. All fiber supplied without a valid SFI 2015-2019 Forest Management Standard certificate, valid SFI Chain of Custody Standard certificate, or valid *other credible chain of custody standard* certificate is subject to the need for a risk assessment as per Part 4 of the SFI Chain of Custody.	Refer to SFI 2015-2019 Chain of Custody – Part 4 Due Diligence System.

3.7.1.7 Program to address any significant risk identified under 3.7.1.2 and 3.7.1.6

3.7.1.8 See Section 7 in the SFI requirements document for SFI's Policy on Illegal Logging.

PART 4: MINIMUM MANAGEMENT SYSTEM REQUIREMENTS

4.1 General Requirements

The organization shall operate a management system in accordance with the following elements of this standard, which ensure correct implementation and maintenance of the chain of custody process. The management system shall be appropriate to the type, range and volume of work performed.
Note: An organization's quality (ISO 9001:2008) or environmental (ISO 14001:2004) management system can be used to meet the minimum requirements for the management system defined in this standard.

4.2 Responsibilities and Authorities for Chain of Custody

4.2.1 Management Responsibilities

4.2.1.1 The organization's top management shall define and document its commitment to implement and maintain the chain of custody requirements, and make this available to its personnel, suppliers, customers, and other interested parties.

4.2.1.2 The organization's top management shall appoint a member of the management who, irrespective of other responsibilities, shall have overall responsibility and authority for the chain of custody.

4.2.1.3 The organization's top management shall carry out a regular periodic review of the chain of custody and its compliance with the requirements of this standard.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
Should regular be defined?	This leaves a strong place to interpretation.		2	Task Group has reviewed the comment but is of the opinion that *certified program participants* should be able to	None

				determine the required periodicity of their periodic review in consultation with their *certification body*.	

4.2.2 Responsibilities and Authorities for Chain of Custody

The organization shall identify personnel performing work affecting the implementation and maintenance of the chain of custody, and establish and set responsibilities and authorities relating to the chain of custody process:

a. raw material procurement and identification of the *origin*;
b. product processing covering physical separation or percentage calculation and transfer into output products;
c. product sale and labeling;
d. record keeping; and
e. internal audits and non-conformity control.

Note: The responsibilities and authorities for the chain of custody given above can be cumulated.

4.3 Documented Procedures

The organization's procedures for the chain of custody shall be documented, and include at least the following elements:

a. description of the raw material flow within the production process;
b. organization structure, responsibilities and authorities relating to chain of custody; and
c. procedures for the chain of custody process covering all requirements of this standard.

4.4 Record Keeping

4.4.1 The organization shall establish and maintain records to provide evidence it has conformed to the requirements of this standard and its chain of custody procedures are effective and efficient. The organization shall keep at least the following:

a. records of all suppliers of forest-based raw material, including information to confirm requirements at the supplier level are met;
b. records of all purchased forest-based raw material, including information on its *origin*;
c. records that demonstrate how the certification percentage for each product group was calculated;
d. records of all forest-based products sold and their claimed *origin*. including, as applicable, records of movements in volume credit accounts;
e. records of internal audits, non-conformities which occurred and corrective actions taken; and
f. records of top management's periodic review of compliance with chain of custody requirements.

4.4.2 The organization shall maintain the records for a minimum period of three years unless stated otherwise by law.

4.5 Resource Management

4.5.1 Human Resources/Personnel

The organization shall ensure that all personnel performing work affecting the implementation and maintenance of the chain of custody shall be competent on the basis of appropriate training, education, skills and experience.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
What exactly will be used at proof for such training?	Uncertainty as to what exactly consists of 'appropriate' training.		2	The Task Group has reviewed the comment but is of the opinion that this existing requirement is clear – personnel needed for implementation of the Chain of Custody need to have the appropriate training.	None

4.5.2 Technical Facilities

The organization shall identify provide and maintain the infrastructure and technical facilities needed for effective implementation and maintenance of the organization's chain of custody to meet the requirements of this standard.

4.6 Internal Audit and Management Review

4.6.1 The organization shall conduct internal audits at intervals of no more than one year covering all requirements of this standard, and establish corrective and preventive measures if required.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
How has this changed with regards to responsibilities? Is this on-site specific or electronic audit? Clarify what is required/audited.			2	Task Group has reviewed the comment and believes that the requirements of Part 5 of the Chain of Custody are clear regarding the requirements for internal audit.	Refer to SFI 2015-2019 Chain of Custody – Part 5 Minimum Management System Requirements
How is internal management review done on multiple sites? Now this includes single site. Clarify intent			2	Task Group has reviewed the comment but believes that the commenter misunderstands the requirement interpreting it to be for a single site CoC. Requirement applies to single and multi-site systems.	Refer to SFI 2015-2019 Chain of Custody – Part 6 Internal Audit and Management Review.
It is vague if this is separate from an annual review; even prepping for an	Add language to 21.1.3		3	Comment references requirement	Refer to SFI 2015-2019 Forest

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
audit is an internal audit. If it is separate, that would be cumbersome.	AND in Guidance that one may already be doing an internal audit if doing an annual review, etc. AND clarify that an internal audit can be done in pieces overtime			in SFI 2015-2019 Objective 21. Comment has been addressed by Forest Management Task Group.	Management Standard PM 15.1 and SFI 2015-2019 Fiber Sourcing Standard PM 10.1.

4.6.2 The organization shall conduct the internal audit in accordance with the following requirements:

a) The internal audit shall be undertaken by personnel that have adequate knowledge of the SFI standard;
b) Off-site interviews and desk audits are permissible, appropriate to the scope and scale of the organization;
c) If there have been no inputs or outputs for a site or manufacturing facility over the past year, internal audits are not required;
d) If a site or manufacturing facility has had no sales of SFI certified products over that past year, internal audits are not required;
e) Internal audits are to assess overall organizational conformance and internal audit documentation can consist of one consolidated internal audit checklist and/or report; and
f) Where non-conformities are identified during the internal audit process, a Corrective Action Plan shall be developed at the site and/or organizational level.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
Recognize the alignment of PEFC is good but we'd prefer the opposite. Especially considering sites where one has not made a sale in a week. PEFC requires internal audit for all sites of a multisite chain of custody even if one of the site has not made a transaction over the past year. SFI authorizes to waive the annual audit for the inactive sites.	Better for PEFC to align with you instead		3	General comment.	None
Appropriate to the scope and scale of the association (internal audit)	Needs some precision		2	Task Group has reviewed the comment but believes the requirement is clear as written.	None
More definition should be done over point b, as to which scope and scale of organization can use desk audits.	Uncertainty as to which sites should be audits in person.		2	Talks Group has reviewed the comment but believes that the certified program participant should identify those sites that need to be audited on-site based on an assessment of Part 5.6.2 (c) and (d); 5.6.3 and 5.6.6 and 6.2	Refer to SFI 2015-2019 Chain of Custody Parts 5.6.2; 5.6.3; 5.6.6 and 6.2

4.6.3 Where the organization has outsourced activities within the scope of its chain of custody the organization shall develop procedures for the audit of those contractors.

4.6.4 The internal audit of outsource contractors may be conducted remotely.

4.6.5 Where there are sufficient outsource contractors the internal audit may use a sampling approach for these contractors.

4.6.6 The internal audit of outsource contractors shall:

a) determine the level of risk associated with the outsourced activities as determined by Part 5.0 Outsourcing

b) include within the scope of the internal audit those outsourced activities assessed as high risk.

4.6.7 The organization shall have its rationale for remote audits and its sampling procedure audited by its third party certifier.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
Must be audited to why we chose an off-site (section 9 multisite IAF document 0.1)	Needs some precision. See the interpretation under section 9.		2	The Task Group has reviewed the comment but believes that the requirement in Part 5.6.7 is clear.	Refer to SFI 2015-2019 Chain of Custody – Part 5.6.7.

4.6.8 The results of internal audits shall be reported to management for review during the annual management review.

PART 5 - OUTSOURCING AGREEMENTS

5.1 Outsourcing Agreements

Chain of custody certificate holders who outsource processing or manufacturing activities on a flexible basis to any one of a number of potential contractors may apply for inclusion of the outsourced process within the scope of their SFI Chain-of-Custody certificate. Organizations that wish to include outsourcing within the scope of their SFI chain of custody certificate shall ensure the following:

a) the organization has legal ownership of all input material to be included in outsourced processes;
b) the organization does not relinquish legal ownership of the materials during outsourced processing;
c) the organization has an agreement or contract covering the outsourced process with each contractor. This agreement or contract shall include a clause reserving the right of the SFI-accredited certification body to audit the outsourcing contractor or operation;
d) the organization has a documented control system with explicit procedures for the outsourced process which are shared with the relevant contractor.

The organization shall issue the final claim statement and documentation for the processed or produced SFI-certified material following outsourcing. The documentation shall state the certificate holder's Chain of Custody certificate number and formal claim statement.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
Do loggers and truckers service contracted to harvest and move stumpage fall with the outsourcing of processing definition?			3	No – however the requirement in Part 3.3.1 addresses the intent of the comment.	Refer to SFI 2015-2019 Chain of Custody Standard Part 3.3.1.
C and D – the certified Program Participant develops the outsourcing control procedures to outsourcing company. And then in 5.2 – that qualifies as high risk. Need consistency with this indicator.			2	The Task Group has reviewed the comment and is of the opinion that the requirement in 5.1 (d) allows the outsource contractor to meet the parameters for low risk as outlined in Part 5.2.	Refer to SFI 2015-2019 Chain of Custody Parts 5.1 and 5.2.

That is not what's going on right now. Realistically, sometimes it is the organization, sometimes not. Sometimes it is someone else doing it, like a warehouse.			3	Comment is addressing those scenarios where certified product is shipped by the outsource contractor (e.g. warehouse). Responsibility for of correct creation of and transmission of the sales documentation lies with the *certified program participants.*	None
Need to make sure it's in one or the other. Some examples don't fall in either			3	Task Group interprets the comment as requiring the outsourcing process to be contained in the contract or agreement. This is how the requirement is currently written.	Refer to SFI 2015-2019 Chain of Custody Part 5.1.
If an organization has lot of outsourcing contractors, how many do they have to audit?			3	Section 9 has parameters for establishing audits of outsource contractors.	Refer to SFI 2015-2019 Section 9 – Audit Procedures and Qualifications.

5.2 Assessing Risk for Outsource Contractors

As per the requirements of 4.6.6 outsourced activities shall be risk-ranked in accordance with the following criteria:

i. Low Risk: outsource contractor receives the certified material from the organization and material is physically segregated from other non-certified material and contractor returns the material back to the organization after the outsourced work is completed.

ii. High Risk: one or more of the following would indicate high risk scenarios:

- The outsourced contractor lacks the procedures to prevent the mixing of the organization's certified material with that of other companies' materials that are unrelated to the outsourced process.
- The outsource contractor receives certified material purchased by the organization for the process directly from the supplier on the organization's behalf and ships finished product to the end customer on the organization's behalf.
- The outsource contractor applies the organization's SFI label to the finished product and ships product direct to the customer.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
	Define "outsource"		2	The Task Group has reviewed the comment but is of the opinion that the term outsource is widely understood and does not need definition.	None

Confusing, too many shades of grey - Make this a pass, fail option			2	Task Group has reviewed the comment but is of the opinion that the determination of low or high risk is more nuanced that a simple "pass / fail" approach. The variation in types of outsourced processes can be significant and the *certified program participants* must conduct an assessment of their specific situation.	None
High risk outsourcer criteria includes those who only warehouse and ship. Change to low-risk if no processing occurs.	Risk is low when contractor does nothing to the product except ship it at the discretion of the organization.	Discussion needed for best wording.	2	The Task Group has reviewed the comment but believes that warehousing operations are not the same as "product processing and manufacturing" as outlined in Part 6.1. Therefore warehouse operations where the finished product is stored and shipped would not be high-risk.	None

APPENDIX 1: CALCULATION OF THE CERTIFICATION PERCENTAGE (Informative)

DEFINITION OF THE PRODUCT GROUP

The organization shall identify production batch(es) for which the certification percentage is calculated. The product group shall be identified for specific products or groups of products. Only products that consist of the same or similar raw material can be included in one product group.

Table 1: Example of chain-of-custody product group definition

Output products	Input raw material	Chain-of-custody product group	Units for credit account
Spruce lumber A	Spruce, Pine, Fir (SPF) sawlogs	Spruce, Pine, Fir (SPF) products	Tons of Spruce, Pine, Fir (SPF) sawlogs
Pine lumber B			
Fir lumber C			
Fir/Spruce/Pine (SPF) chips			
Alder lumber A	Alder sawlogs	Alder products	Tons of Alder sawlogs
Alder lumber B			
Alder lumber C			
Alder chips			
Alder/Pine/Spruce sawdust	Alder/Spruce/Pine sawlogs	Residue products	Tons of Alder/Spruce, Pine Fir (SPF) sawlogs
Alder/Pine/Spruce bark			

CALCULATION OF THE CERTIFICATION PERCENTAGE The company can use two methods to calculate the certification percentage (simple percentage or rolling average percentage):

Simple Percentage

The certification percentage for the specific product group is calculated from the material included in that specific product group. As a result, the organization applying this method must know

the percentage of *certified content* before any product from that product group is sold or transferred.

Rolling Average Percentage

The rolling average percentage is obtained by using the quantity of raw material procured in the specified previous period. As a maximum, the rolling average can be applied over the last 12 months.

EXAMPLE OF A THREE-MONTH ROLLING AVERAGE The certification percentage for the product group is calculated from volumes of certified and other raw material procured during the previous three-month period (excluding the current product group). Note: When the organization starts the chain of custody and the time period used in rolling average calculation is longer than the time period the chain of custody has been in place, the calculation of the rolling average is carried out from the volumes procured since the chain of custody was established. An example is given in table 2: The first rolling average (month 1) is calculated only from volumes procured in month 1, the second rolling average (month 2) is calculated only from volumes procured in months 1 and 2.

Table 2: Example of a three-month rolling average

1	2	3	4	5	6
No of the 1- month calcul. period	Volume of certified raw material procured (tons) *	Volume of other raw material (tons) *	Sum of volumes of certified raw material for previous 3 months (tons)	Sum of volumes of other raw material for previous 3 months (tons)	3-month rolling average percentage
j=i	Vc	Vo	Vc(3)	Vo(3)	Pc(3)
			$Vo(3)=\sum_{j=i}^{i-2} Vc_i$	$Vo(3)=\sum_{j=i}^{i-2} Vo_i$	$Pc=\frac{Vc(3)}{Vc(3)+Vo(3)}$
1	11	90	11	90	10.89%
2	12	90	23	180	11.33%
3	13	90	36	270	11.76%
4	14	90	39	270	12.62%
5	15	90	42	270	13.46%
6	16	90	45	270	14.29%
7	17	90	48	270	15.09%
8	18	90	51	270	15.89%
9	19	90	54	270	16.67%
10	20	90	57	270	17.43%
11	21	90	60	270	18.18%
Continues					

* The volume figures given in the table above are only examples

Example of calculation given in table 2:

a) [column 4] Volume of certified raw material is calculated as sum of volumes of certified raw material procured in the previous 3 months.

$Vc(3)_6 = Vc_6 + Vc_5 + Vc_4$; $Vc(3)_6 = 16 + 15 + 14 =$ **45** [tons]

b) [column 5] Volume of other raw material is calculated as sum of volumes of other raw material procured in the previous 3 months.

$Vo(3)_6 = Vo_6 + Vo_5 + Vo_4$; $Vo(3)_6 = 90 + 90 + 90 =$ **270** [tons]

c) [column 6] The rolling average percentage is calculated according to the formula of chapter 3.3.1: Pc = Vc / [Vc + Vo]

$Pc_6 = 100 * Vc(3)_6 / [Vc(3)_6 + Vo(3)_6]$; $Pc_6 = 100 * 45 / [45 + 270] =$ **14.29 %]**

Note: The product group period does not need to be equal to the calculation period as long as it does not exceed the length of the calculation period.

SECTION 4: RULES FOR USE OF SFI CERTIFIED SOURCING LABEL

PREFACE

SFI Inc. is an independent, non-profit, charitable organization dedicated to promoting sustainable forest management in North America and supporting responsible procurement globally. The SFI Board is a three chamber Board of Directors representing environmental, social and economic interests equally, and the program addresses local needs through its grassroots network of 37 SFI Implementation Committees across North America. *SFI Inc.* directs all elements of the *SFI* program including the SFI forest standard, chain-of-custody certification, *fiber sourcing* requirements, labeling and marketing.

Consumers in growing numbers want assurance that their buying decisions represent a sound environmental choice. They are asking for proof that wood, paper and packaging products are made with raw materials from *certified forest content* and *certified sourcing*. The Rules for Use of SFI On-Product Labels as well as the SFI Chain-of-Custody Standard deliver a reliable and credible mechanism so businesses can provide this assurance to their customers.

The *SFI* program meets guidelines on environmental claims in product advertising and communication issued by the U.S. Federal Trade Commission and guidelines on environmental labeling and advertising issued by the Competition Bureau of Canada.

Studies have shown that consumers appreciate the value of forest certification in helping them identify wood and paper products from legal, responsible sources.

The fact that the *SFI* program can deliver a steady supply of fiber from well-managed forests is especially important at a time when there is increasing demand for green building and responsible paper purchasing, and only 10 percent of the world's forests are certified. The American Consumer Council says it supports the good work of the *SFI* program, and applauds the positive and progressive actions it is taking. A poll by TerraChoice Environmental Marketing found that procurement specialists included the SFI label on a list of the top 10 eco-labels they relied on frequently to make buying decisions.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
SFI certified sourcing label use for secondary producers is providing a disincentive to use chain of custody. Surveyed all audit staff, and of the many hundreds of CoC audits performed during 2013, we can recall less than a dozen instances where a printer or converter used the SFI CoC label and made a valid CoC claim. Some have dropped, or are threatening to drop CoC and just go with certified sourcing.	SFI CoC program may be the most transparent, but not if it is not used, if everyone defaults to certified sourcing.	Do away with certified sourcing for secondary producers. Require secondary producers to be CoC certified to pass on any claim, including certified sourcing, from a primary manufacturer.	2	The Chain of Custody and Fiber Sourcing Task Groups have reviewed the comment and have introduced requirements regarding the Fiber Sourcing Standard having Secondary producers meeting minimum management requirements and assessing for sources from controversial sources.	Refer to SFI 2015-2019 Fiber Sourcing Standard Appx. 1, parts 6 and 7.

The SFI Certified Sourcing label should be eliminated or strengthened significantly as it is misleading to 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 forests management fiber content. If the label is kept, it should be redesigned and renamed to more accurately reflect its focus on BMPs and outreach. Also, products produced under other standards should not be granted an SFI label. We have noted the changes made to the labeling section and are concerned that SFI labels can be used for products certified to standards with varying levels of rigor. The added SFI Forest Content Label and the stipulation that secondary producers may use the Certified Sourcing label on products from a single manufacturing unit if certain conditions are met only serve to increase confusion and decrease the transparency of the standard.	The SFI Certified Sourcing label is weak, misleading, and does not promote responsible forestry. The current SFI Certified Sourcing label is misleading to consumers, as it provides no guarantee that fibers were sourced from non-controversial sources. The lack of transparency behind this label provides unnecessary confusion in the marketplace due to the wide range of practices that can be behind the label. These practices 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 solely on outreach and does not provide assurances on responsible forestry, avoidance of controversial sources such as conversion (see the controversial sources section), and fiber legality.		2	The SFI Review Task Force respectfully disagrees with these comments. In fact, the SFI program is the only program globally that addresses sourcing from small, non-certified lands. The requirements of certified sourcing are directed at ensuring among other requirements the use of best management practices, promotion of conservation of biological diversity and the use of Qualified Logging Professionals. The SFI Certified Sourcing Label is clear in that it is not making a claim of certified content. 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. The proposed new requirements regarding pre-consumer fiber is consistent with PEFC. 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. However, the Chain of Custody and Fiber Sourcing Task Groups have reviewed the comment and are proposing that the Fiber Sourcing Standard contain a requirement for secondary producers to have meet minimum management requirements and assess for sources from controversial sources. This requirement if also addressed in Section 4 SFI On-Product	Refer to SFI 2015-2019 Fiber Sourcing Standard Appx. 1, parts 6 and 7.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
Cost of redesign, print and replacement of new label every few years. Should remain consistent over time.			1	Comment is noted and understood.	None
Too much information, too crowded	Simply and provide and include detailed information at SFI website		1	Task Group has reviewed any revisions to the current labels mindful of the amount of information contained in labels.	None
There are no multi-site standards for multi-site organizations that are certifying to Certified Sourcing only.	Include multi-site provisions in the CS standard.		3	Comment is incorrect - Appendix 1 of Section 9 states that audits of multi-site organizations certified to Section 4 of the SFI program must be conducted in accordance with IAF MD-01 (IAF Mandatory Document for The Certification of Multiple Sites Based on Sampling Issue 1).	Refer to SFI 2015-2019 Section 9 – Appendix 1.
No requirement for making a claim for Certified Sourcing. Claims and certificate numbers are required for CoC only. This weakens the brand.	There should be standards for CS claims.		3	Part 3.4 of Appendix 1 of the SFI 2015-2019 Fiber Sourcing Standard addresses claims for Certified Sourcing. Certified Sourcing label users must have SFI license number the SFI on Certified Sourcing Label	Refer to SFI 2015-2019 Fiber Sourcing Standard Appendix 1 - part 3.4
Biomass Energy: The standards don't do a good job of considering industries that don't have a wood product but produce electrons as their output. Certified sustainable input sourcing is an important consideration to these industries. These industries lend themselves well to Certified Sourcing; hence the importance of beefing up the CS standard, separating it from trademark use and insuring multi-site standards.			3	SFI is working to enhance the requirements of SFI Section 4 SFI On-Product Label Use and has been working with *certified Program Participants* in the bioenergy sector to communicate the positive attributes of SFI Certified Sourcing.	None
This section combines CoC and Labeling which is confusing. They don't lend themselves to being in the same part of the standards. Just as FSC separates Controlled Wood from Trademark standards.	Separate CoC and Labeling into separate sections		2	The Task Group believe that for use of use and clarity it is best to keep all SFI label use requirement in one section of the program.	Refer to SFI 2015-2019 Fiber Sourcing Standard Appendix 1.
What should multiple-site do for certified sourcing?			3	Appendix 1 of Section 9 states that audits of multi-site organizations certified to SFI 2015-2019 Fiber Sourcing Standard – Appendix 1 must be conducted in accordance with IAF MD-01 (IAF Mandatory Document for The Certification of Multiple Sites Based on Sampling Issue 1).	Refer to SFI Section 9 – Appendix 1.
No requirements for making a claim for certified sourcing	Include a claim for certified sourcing (without it the brand is weaker)		3	Part 5.5 of Section 4 On-Product Label Use addresses the SFI Certified Sourcing claim.	Refer to SFI 2015-2019 Fiber Sourcing Standard Appendix 1 - part 3.4.
General comment regarding labels. There are too many labels. Consider developing a single label for on product use and require CoC.	Simplify labels and label rules. Cost savings for PPs and for SFI to administer and market. Less risk of consumer confusion.	N/A. Comment is suggestion to consider a single label approach going forward with mandatory CoC.	2	SFI periodically conducts surveys to assess the understanding and awareness of its labels. The results of these surveys are one of the factors considered when deciding to develop new or revised labels.	None

PART 2. NORMATIVE AND INFORMATIVE REFERENCES

2.1 Normative: The following normative SFI standards are referenced in this document and can be found on the *SFI Inc.* website at www.sfiprogram.org:

i. Section 2 - *SFI 2015-2019 Standard*
ii. Section 4 – SFI On-Product Label Use Rules
iii. Section 5 – Rules for use of SFI Off-Product Marks
iv. Section 13 – SFI Definitions

2.2 Informative: The following informative SFI standards are referenced in this document and can be found on the SFI Inc. website at www.sfiprogram.org:

i. Section 3 – SFI Chain-of-Custody Standard
ii. Section 9 – SFI 2015-2019 Audit Procedures and Auditor Qualifications and Accreditation

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
Section 3, SFI Chain-of-Custody Standard should be normative	This label would be greatly strengthened if CoC was mandatory. CoC should be mandatory for label use.	Make CoC mandatory for use of any of the SFI product labels.	2	Task Group will consider this and make recommendation to the Board of Directors for their consideration.	None

PART 3. CERTIFIED SOURCING LABEL

3.1 *Primary producers* are manufacturing units that produce forest products (wood, paper, pulp, or composite products) and source 50% or more (by weight) of their wood-based raw materials directly from *primary sources*. They must account for 100% of their *primary sources* as coming from *certified sourcing*.

If a *primary producer* sources from company-owned or company-controlled lands enrolled in the *SFI program*, those lands must be third-party certified to the SFI 2015-2019 Standard.

3.2 *Secondary producers* are manufacturing units that produce forest products and source 50% or more (by weight) of their wood-based raw materials from *secondary sources*. They must account for at least two-thirds (2/3) (by weight) of the wood or wood fiber in the product(s) or manufacturing unit as coming from *certified sourcing*. The other one-third (1/3) cannot come from *controversial sources*.

3.3 The label cannot be used if offshore raw material comes from *controversial sources* so adequate measures are needed to ensure certified products do not include fiber from *controversial sources*.

3.4 Calculation of percentage for use of the Certified Sourcing Label is as follows:

3.4.1 *Primary producers* shall demonstrate conformance with the requirements of 3.1 at all times, which means 100% *certified sourcing* for every production batch.

3.4.1.1 If less than 5% (by weight) of a manufacturing unit's raw material supply comes from *secondary sources*, these sources are considered de minimis and no certification of this portion is required if all is from U.S. or Canadian sources.

3.4.2 *Secondary producers* shall specify how they will meet the requirements of 3.2 to conform to the two-thirds rule. They may base the calculation on a production batch or time period (which cannot exceed one quarter). The percentage may be calculated as:

- Rolling Average Percentage – The percentage calculated for wood fiber consumed during, for example, the previous four quarters or 12 months. The period over which the rolling average is calculated shall not exceed one year.
- Simple Percentage – The percentage calculated for wood fiber consumed in the specific production batch.

3.4.3 In all cases, the organization must demonstrate that the requirements of 3.1 and/or 3.2 are met before the label can be used in relation to a specific production batch or time period.

3.4.4 A *secondary* producer may use the Certified Sourcing Label on products from a single manufacturing unit as long as the specific supply for that product(s) or for that manufacturing unit meets all the content requirements set out in this document.

3.4.5 The sourcing requirement may be met either at the product line or manufacturing unit level.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
Certified Sourcing labels may be misleading to customers as they do not guarantee that fiber comes from sustainably managed forests.	The Certified Sourcing label should be strengthened to require that fiber is sustainably sourced, eliminated, or renamed to indicate that it is focused on training and practices and does not guarantee that fiber comes from sustainably managed forest.	Recommend strengthening or renaming Certified Sourcing label and revising language around it to address concerns about potentially misleading customers.	2	The Chain of Custody and Fiber Sourcing Task Groups have reviewed the comment and are proposing that the Fiber Sourcing Standard contain a requirement for Secondary producers to have meet minimum management requirements and assess for sources from controversial sources.	Refer to SFI 2015-2019 Fiber Sourcing Standard Appx. 1 parts 6 & 7.
Though understandable, this requirement is poorly worded.	Change for clarity.	Change to, "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	The Task Group has reviewed the comment and believes that the comment is addressed in the Section 4 SFI On-Product Label Use Part 6. Also, the new Fiber Sourcing Standard will have new requirements for *Secondary producers* seeking to use the Certified Sourcing label one of which includes conducting a risk assessment to determine the risk of sourcing from *controversial sources.*	Refer to SFI 2015-2019 Fiber Sourcing Standard Appx. 1 part 6.

SECTION 4. RULES FOR USE OF SFI CERTIFIED SOURCING LABEL

	There has been little change in the requirements behind the SFI Fiber Sourcing Label, which 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.)	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 Certified Fiber Sourcing Label should be eliminated, renamed to reflect what it actually is (an outreach label), or strengthened significantly to address basic issues such as sustained yield, rare species conservation, sound silviculture, etc.	2	The SFI Review Task Force respectfully disagrees with these comments. In fact, the SFI program is the only program globally that addresses sourcing from small, non-certified lands. The requirements of certified sourcing are directed at ensuring among other requirements the use of best management practices, promotion of conservation of biological diversity and the use of Qualified Logging Professionals. The SFI Certified Sourcing Label is clear in that it is not making a claim of certified content. 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. The proposed new requirements regarding pre-consumer fiber is consistent with PEFC. 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. However, the Chain of Custody and Fiber Sourcing Task Groups have reviewed the comment and are proposing that the Fiber Sourcing Standard contain a requirement for secondary producers to have meet minimum management requirements and assess for sources from controversial sources. This requirement if also addressed in Section 4 SFI On-Product Label Use, Part 6 - Due Diligence System to Avoid Controversial Sources.	Refer to SFI 2015-2019 Fiber Sourcing Standard - Appx. 1: Rules for Use of the SFI Certified Sourcing Label, parts 6 & 7.

PART 4. ORGANIZATIONS OUTSIDE THE UNITED STATES AND CANADA

4.1 A *primary producer* or *secondary producer* outside the United States and Canada must successfully complete an annual audit by an accredited *SFI certification body* against the requirements of Section 4 — *Rules For Use Of SFI On- Product Labels* document.

4.2 A *primary producer* outside the United States and Canada must account for 100% of its *primary sources* as coming from *certified sourcing*.

4.3 A *secondary producer* outside the United States and Canada must account for at least two-thirds (2/3) (by weight) of the wood or wood fiber in the product(s) or manufacturing unit as coming from *certified sourcing*. The other one-third (1/3) cannot come from *controversial sources*.

PART 5. CERTIFIED SOURCING

Certified sourcing: is defined as raw material sourced from the following sources confirmed by a *certification body*:

5.1 Fiber that conforms with objectives 8-20 of Section 2 — SFI 2015-2019 Standard's *fiber sourcing* requirements.

5.2 *Pre-Consumer Recycled Content*: Material diverted from the waste stream during a manufacturing process. It does not include materials such as rework, regrind or scrap generated in a process and capable of being reclaimed within the same process.

Any claims about *pre-consumer recycled content* by *Program Participants* or *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.

5.3 *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.

Any claims about *post-consumer recycled content* by *Certified 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.

5.4 *Certified forest content*, which includes content from specific forest tracts that are third-party certified to conform with the SFI 2015-2019 Standard's forest land management requirements (Objectives 1-8 and 15-21) or other acceptable forest management standards (e.g. CAN/CSA-Z809 and ATFS).

5.5 SFI Certified Sourcing Claim

SFI *Certified* Sourcing (Fiber that conforms with Objective 9-21 of Section 2, and/or from *pre-consumer recycled content,* and/or from *post-consumer* recycled content, and/or from an *acceptable forest management standard.*

5.6 *Non-controversial sources*: The organization shall establish adequate measures to ensure that the labeled products do not come from *controversial sources*. See Section 3, 3.6 and Section 4, 6.1 on the process to avoid *controversial sources*. Up to one third of the supply for *secondary producers* can come from *non-controversial sources* for use of the certified sourcing label; the other two-thirds must come from the sources defined under the *certified sourcing definition*— fiber that conforms with objectives 9-21 of Section 2, and/or *pre consumer recycled content,* and/or *post-consumer recycled content,* and/or from an *acceptable forest management standard.*

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
5.6 Non-controversial sources should include more than sources that are of questionable legality.	Controversial sources should explicitly include ecologically sensitive areas.	Recommend expanding the definition of controversial sources to protect against ecological threats that go beyond basic legality requirements. This would include language prohibiting conversion or degradation of native forests or areas with high biodiversity or conservation value.	2	Task Group has reviewed the comment and believes the comment is addressed by the due diligence system in Part 6 and in the revised definition of *controversial source* addresses the comment.	Refer to SFI 2015-2019 Fiber Sourcing Standard Appx. 1, Part 6 and Section 13 – Definitions

PART 6. PROCESS TO AVOID CONTROVERSIAL SOURCES

6.1 Avoidance of *Controversial Sources*

When raw materials are supplied without a SFI chain of custody claim and valid certification or *other credible chain of custody standard* claim and valid certificate the organization shall establish adequate measures to ensure that the certified products do not include raw material form *controversial sources.* Use of controversial sources is not allowed in SFI-labeled products. Controversial sources include forest activities which are not in compliance with applicable state, provincial or federal laws, particularly as they may relate to:

- legally required protection of threatened and endangered species,
- requirements of CITES (The Convention on International Trade in Endangered Species of Wild Fauna and Flora),
- legally required management of areas with designated high environmental and cultural values,
- labor regulations relating to forest workers,
- indigenous peoples' property, tenure and use rights.

Fiber sourced from *illegal logging* and fiber sourced from *areas without effective social laws are also controversial sources.*

Note: *Conversion sources* cannot be included when calculating *certified forest content.*

The organization shall:

6.1.1 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.

6.1.2 Evaluate the potential risk of procuring raw material from *controversial sources* and establish a program to check a sample of self-declarations by suppliers, using second- or third-party verification. Note: The potential risk evaluation carried out by the organization should be based on the regional/ country level.

6.1.3 Ensure procurement from areas outside the United States and Canada promote the *conservation of biodiversity hotspots* and *high-biodiversity wilderness areas*.

6.1.4 Develop a process with direct suppliers to promote the principles of sustainable forestry.

6.1.5 Ensure it knows whether direct suppliers are applying the principles of sustainable forestry.

6.1.6 Have a process in place to assess the risk of fiber from countries without effective social laws addressing the following:

- workers' health and safety;
- fair labor practices;
- indigenous peoples' rights;
- antidiscrimination and anti-harassment measures;
- prevailing wages; and
- workers' right to organize.

6.1.7 Program to address any significant risk identified under 6.1.2 and 6.1.6

6.1.8 See Section 7 of the SFI requirements document for *SFI Inc.*'s Policy on *Illegal Logging*.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
Definition "controversial sources". The definition is not flexible, doesn't allow for the reality (i.e., trees from road building).	Broaden the definition to allow for things like trees from road building on certified lands would be considered certified.		3	Part 5.5 of Section 4 clearly addresses the comment. Controversial Sources must be addressed in Section 4. Trees harvested during the course of planned forest management activities (road construction, log processing areas, etc.) are not considered conversion and therefore not controversial sources.	Refer to SFI 2015-2019 Fiber Sourcing Standard Appx. 1, Part 5.5.
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.	This is an 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.	Possible new language: "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	Task Group has reviewed the comment and believes that the comment is addressed in Part 6 – Due Diligence System to Avoid *Controversial Sources*.	Refer to SFI 2015-2019 Fiber Sourcing Standard Appx. 1, Part 6.

6.1 Add requirement that clarifies that conversion sources cannot be included in products that carry the certified sourcing label	Now that SFI has put indicators related to conversion of forest types and conversion to non-forest use into normative language, and since CoC has always prohibited conversion sources from being considered certified forest content, it seems to us that the SFI Fiber Sourcing requirements is now vulnerable to criticism for allowing conversion sources to be included in products that carry the certified sourcing label.	Modify the "Note" in 6.1 to read: Note: Conversion sources cannot be included when calculating certified forest content or certified sourcing.	2	Task Group has reviewed the comment and concurs and has removed the note.	Refer to SFI 2015-2019 Fiber Sourcing Standard Appx. 1, Part 6.
Currently this only applies to wood fiber sources outside of the country, but this now also incorporates consideration of domestic sources	This may also help address current concerns with the UK Timber Procurement Policy. We are supportive.		3	Comment is supportive of draft language.	None
6.1.3 Ensure procurement from areas outside the United States and Canada promote the conservation of biodiversity hotspots and high-biodiversity wilderness areas	Biodiversity hot spots and wilderness should include those in the US an Canada too.	Ensure fiber procurement promotes the conservation of biodiversity hotspots and high-biodiversity wilderness areas.	2	Task Group has reviewed the comment and believes the comment is addressed by the due diligence system in Part 6 and in the revised definition of *controversial source* addresses the comment.	Refer to SFI 2015-2019 Fiber Sourcing Standard Appx. 1, Part 6 and Section 13 – Definitions
When purchasing wood indirectly from private landowner the buyer doesn/t always know the intention of the private landowner to convert his land to other uses.			2	The Task Group has reviewed the comment and accepts that the buyer can only make decisions to accept/reject fiber based on the information regarding the future use of the seller's property on-hand at the time of the purchase.	None
6.1 The process to avoid controversial sources needs to explicitly include Forests with Exceptional Conservation Value.	There should be an assurance that fiber sourced without a SFI chain of custody claim and valid certificate or other credible chain of custody standard claim and valid certificate does not originate from FECV. Otherwise certified program participants will not be able claim that all the fiber they source is from legal and responsible sources, regardless of whether it is from certified or uncertified forests.	Fiber sourced from Forests with Exceptional Conservation Value, from illegal logging, and from areas without effective social laws are also controversial sources.	2	Task Group has reviewed the comment and is of the opinion that the revised *controversial sources* definition, with its requirement for protection of threatened and endangered species and areas with designated high environmental and cultural values, addresses the comment	Refer to SFI 2015-2019 Fiber Sourcing Standard Appx. 1, Part 6 and Section 13 – Definitions.

PART 7. APPLICATION REQUIREMENTS

7.1 *Primary producers* must annually submit to the *Office of Label Use and Licensing*:

1. A copy of their *Certified Sourcing certificate* issued to *Primary Producers* certified to Section 2 – SFI 2015-2019 *Fiber Sourcing* Objectives 9-21, and a copy of their annual audit report issued by an *SFI certification body* that clearly identifies the specific forestlands and/or manufacturing units covered under the scope of the certificate.
2. Evidence of a successful completion of their most recent surveillance audit to the *SFI 2015-2019 Standard*.
3. A list of the manufacturing unit(s) and product(s) for which the SFI Certified Sourcing Label use approval is sought.

7.2 *Secondary producers* must annually submit to the *Office of Label Use and Licensing*:

1. A copy of their *Certified Sourcing* certificate issued to *Secondary Producers* certified to Section 4 – SFI Certified Sourcing Label Use Requirements issued by an accredited *SFI certification body*.
2. A list of the manufacturing unit(s) and product(s) for which the SFI Certified Sourcing Label use approval is sought.

7.3 *Primary or secondary producers* outside the United States and Canada must annually submit to the *Office of Label Use and Licensing*:

1. A copy of their *Certified Sourcing* certificate issued to Secondary Producers certified to Section 4 - SFI Certified Sourcing Label Use Requirements issued by an accredited *SFI certification body*.
2. A list of the manufacturing unit(s) and product(s) for which the SFI Certified Sourcing Label use approval is sought.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
Do these apply just to SFI sourcing or CoC? The way it's set up its confusing (formatting)			3	Part 8 of Section 4 SFI Rules for On-Product Use clearly states that it applies to SFI *Certified Sourcing.*	Refer to SFI 2015-2019 Fiber Sourcing Standard Appx. 1, Part 8.

PART 8. OFFICE OF LABEL USE AND LICENSING

8.1 The *Office of Label Use and Licensing* shall evaluate and approve applications for use of all SFI on-product labels, shall establish label-use rules and procedures set out in the Rules for Use of SFI On-Product Labels and SFI Off-Product Marks (Sections 4 and 5 in the SFI requirements document), and shall maintain oversight of use of all SFI on-product labels.

8.2 A *label user* may not use the *SFI program* label on any products from manufacturing unit(s) for which it has not obtained approval from the *Office of Label Use and Licensing*.
8.3 Approval for use of any SFI on-product labels will become effective upon authorization issued by the *Office of Label Use and Licensing*, and remains in effect for one year, unless terminated pursuant to the terms set out in the SFI Label Agreement.

8.4 The *Office of Label Use and Licensing* may periodically announce additional rules and procedures to ensure ownership and use of the SFI on-product labels are adequately protected under applicable law, and to ensure proper consumer understanding.

8.5 Applicants must provide specific examples of proposed SFI on-product label use and related promotional literature to the *Office of Label Use and Licensing*, in keeping with the Rules For Use of SFI On-Product Labels and SFI Off-Product Marks (Sections 4 and 5 in the SFI requirements document).

8.6 In response to questions and issues raised by SFI on-product *label users* or *certification bodies*, the *Office of Label Use and Licensing* will periodically announce and formally adopt interpretations to the *SFI Responsible Fiber sourcing Standard and Associated Labels* (Section 4 in the SFI requirements document). All interpretations will be posted at www.sfiprogram.org.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
	Do these apply just to SFI sourcing or CoC? The way it's set up its confusing (formatting)		3	Comment addressed in Part 8 of Section 4 SFI Rules for On-Product Label Use. Section 4 applies to all on-product label use which includes SFI Certified Sourcing Label.	Refer to SFI 2015-2019 Fiber Sourcing Standard Appx. 1, Part 8.

	Certified sourcing for secondary producers provides a disincentive for use of CoC program. Of the hundreds of SFI CoC audits performed in 2013, in only a handful of instances did a company actually provide a valid CoC claim. If an SFI claim is made, it is almost always certified sourcing, since categories of origin are too hard to track. Why have a CoC program if you are going to allow everyone to make certified sourcing claim?	SFI CoC program may be the most transparent, but not if it is not used, if clients are allowed to default to certified sourcing	Do away with certified sourcing procedures for secondary producers. Require secondary producers to have chain of custody in order to pass on claims. Require companies to pass on claim received from supplier. If it is certified sourcing, then pass on certified sourcing. If it is CoC, then company must pass on CoC claim, and not default to certified sourcing.	2	Task Group has reviewed the comment and agrees that *secondary producers* need to have more rigorous requirement for use of the Certified Sourcing label. *Secondary producers* will need to meet minimum management system requirements and will need to have a due diligence process for assessing risk of sourcing to *controversial sources*.	Refer to SFI 2015-2019 Fiber Sourcing Standard Appx. 1, Part 6 Due Diligence System to Avoid Controversial Sources and Section 13 – Definition.

PART 9. SFI-CERTIFIED FOREST CONTENT LABELS

The *SFI* program has three chain of custody labels, each showing that some or all of the product's fiber content comes from forests that are third-party certified to the SFI forest management standard or other *acceptable forest management standards*such as, the Canadian Standards Association (CAN /CSA-Z809) and/or the American Tree Farm System (ATFS).

Primary manufacturers of wood, wood pulp and/or pulp and paper products certified to the PEFC Chain of Custody standard can use the SFI label as long as the following critiera are met:

a) the primary manufacturer must be an SFI program participant;
b) the primary manufactuer must be certified to all of the applicable objectives in the SFI 2015-2019 Standard.
c) a company who owns or manages forestlands must be certified to objectives 1-8; 15-21;
d) a company who only sources direct from the forest but does not manage the forestlands must be certified to objectives 9-21;
e) a company who owns or manages forestlands and sources direct from the forest must be certified to all of the applicable objectives for Objectives 1-21.

9.1 Chain of Custody Label for Volume Credit Method Label These two labels may be used by any chain-of-custody certified company that uses the volume credit chain-of-custody method.

9.2 Chain of Custody Labels for Average Percentage Method These two labels may be used by any chain-of-custody certified company that uses the average percentage chain-of- custody method.

9.3 Chain-of-Custody Labels with Mobius Loop Either of the chain of custody labels below can include a Mobius loop stating the percentage of *recycled content* in the product, as illustrated below.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
PEFC CoC and SFI Certified sourcing than the entity gets to use SFI CoC label without financially supporting SFI or going through SFI CoC steps	If an entity wants SFI CoC label, they need to get SFI CoC certified		3	Comment misunderstands the requirement: Primary manufacturer with SFI CoC must also have certification to SFI 2015-2019 Fiber Sourcing Standard. Therefore SFI label users that are Primary manufacturers using either SFI CoC or Certified Sourcing labels must have certification to SFI 2015-2019 Fiber Sourcing Standard	Refer to the the SFI 2015-2019 Fiber Sourcing Standard and the SFI 2015-2019 Chain of Custody Standard.
Were told from the beginning that we were trying to align with PEFC. We could add SFI label to the PEFC fibre – now we state that now you have to have SFI. Why was this added last year and not five years ago? Seems to be incompatible with the strategy of alignment with PEFC. When papers are mixed – PEFC cover over SFI middle -- before it wasn't an issue. Now there is an issue in terms of what gets accepted. Make things complicated for PEFC and SFI label users (as printers who use both labels) and increase risks of errors - non compliances	Clarify. Or could we have a label that says that can we recognize the two labels – notion of fibre sourcing; SFI doesn't not accept PEFC chain of custody. Understand the principal but don't know why it just showed up.		2	Task Group has reviewed the comment but does not entirely understand it. The Task Group thinks comment is referring to the decision in Dec 2012 to require Program Participant with PEFC CoC using PEFC fiber and labelling with a SFI CoC label to be certified to the requirements of SFI 2010-2014 Objectives 8-20.	Refer to the SFI 2015-2019 Fiber Sourcing Standard and the SFI 2015-2019 Chain of Custody Standard.

Make things complicated for PEFC and SFI label users (as printers who use both labels) and increase risks of errors - non compliances			3	General Comment.	None
Labels have lots of text in them – makes them difficult to read when they are shrunk down to usable size	Logo only with link to SFI website.		2	SFI periodically conducts surveys to assess the understanding and awareness of its labels. The results of these surveys are one of the factors considered when deciding to develop new or revised labels.	None
CPPs should use the label that matches the claim. If a company is making a certified sourcing claim, then the certified sourcing label should be used. If a company is making a CoC claim, then a CoC label should be used.	Transparency and credibility	Use of SFI on-product label must match claim	3	This is currently the requirement of the SFI Chain of Custody in Parts 2 and 3.	None
9.2 Allow use of Promoting Sustainable Forestry label for average percent method.	Information on the current options is complex and confusing to customers, potentially causing customer questions and concerns. This causes some companies to opt for the lesser Certified Sourcing label, instead.	Add additional label option.	2	The Task Group has reviewed the comment but has decided to retain the existing CoC labels for use with Average Percent Method.	Refer to SFI 2015-2019 Fiber Sourcing Standard Appx. 1, Part 10.2

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. *Proposed changes to the Standard would also allow preconsumer recycled material (i.e., manufacturing bi-product) to count as "certified content," regardless of whether the source forests were actually certified or even meet the SFI's limited requirements for avoiding "Controversial Sources."* Relevant SFI provisions (2010-2014): SFI Chain of Custody Standard, section 3.4; SFI Rules for Use of SFI On-Product Labels; SFI Definitions. *Proposed new language: SFI Chain of Custody Standard section 3.7.*	None provided. No specific change proposed.	None provided. No specific change proposed.	2	Repeat of prior comment. 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. The proposed new requirements regarding pre-consumer fiber is consistent with PEFC.	None

PART 10. GENERAL RULES FOR USE OF SFI ON-PRODUCT LABELS

SFI Inc. owns the on-product labels shown in Appendix 2. All SFI marks are registered in the United States, Canada, European Union, China, Japan and South Korea. The SFI program owns all right, title and interest in the foregoing marks and exercises legitimate control over the use of these marks. Upon receiving written authorization from the SFI program, qualified organizations or companies may use the certification marks provided the following conditions and limitations are strictly adhered to:

10.1. All SFI labels are registered with both the U.S. Patent and Trademark Office and the Canadian Intellectual Property Office, and each mark must be individually accompanied by an ® to indicate that the on-product label is associated with the *SFI* program.

10.2. All projects with the SFI label must be sent to the SFI *Office of Label Use and Licensing* prior to press. There are no size or color restrictions on the label, but if the certified printer uses the above green/black version, the PMS color is 348.

10.3. The on-product label may be combined with the Program for the Endorsement of Forest Certification schemes (PEFC) on the product label, assuming the organization has met all requirements under PEFC's Annex 4 and Annex 5.

10.4. 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 Associated Labels (Sections 3 and 4), and can only be used to describe *post-consumer recycled content* as described in SFI Definitions (Section 13 of the SFI requirements document).

10.5. The tree/leaf design may not be displayed by itself, and must always be accompanied with either "Sustainable *Forestry* Initiative" or "SFI", the claim associated with the label, and the SFI website(www.sfiprogram.org).

10.6. The SFI label identification number must be added under the SFI program website. The numbering system is as follows: SFI-0000. The *label users* unique label ID is provided by SFI Inc. The label ID number is a different number than the chain of custody number provided by the *certification body*.

10.7 For
private branded products where the company has concern disclosing the relationship with the manufacturer or if there is concern with revealing strategic competitive information about the manufacturer SFI Inc can issue a second SFI label ID number. While the second SFI label ID number would be on the product when searched in the SFI on-line database the supplier information will read 'Contact SFI Inc for More Information on this Product (Tel: 202-596-3450)'. SFI staff can confirm for the person making the enquiry that the label is legitimate based on information supplied.
This second SFI label ID number will only be granted for organizations who produce private branded products and request a private number in order to avoid disclosing competi tive information. The manufacturer must continue to use their originally assigned SFI label ID number for all other products they manufacture and label that do not have compet itiveness concerns as described above.

10.8. The on-product labels can be used in either horizontal or vertical styles.

10.9. The on-product labels can be used in English, French and Spanish, and translations are available.

10.10. Any public communication by *Certified Program Participants* and *label users* shall be accurate and consistent with applicable law and requirements for SFI logo use. *Certified 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.

10.11. The marks may be used on products, including shrink wrap and other product packaging, that have been produced by a primary or secondary producing facility, a publisher, a retailer, or a printer that has qualified for use of the appropriate mark pursuant to the criteria set out in SFI Section 3 and/or SFI Section 4 of the SFI requirements document.

10.12. The marks may be used in product/brochures or advertising for products that qualify to use one of the on-product marks subject to the following rules:

a. When discussing products produced by a qualified facility, the on-product usage is restricted to either, 1) the statement, “Look for this mark on (specified product)” or, 2) in a picture of a product with the mark on the product.
b. When promoting the sale of trees or logs grown on certified land by landowners who have the land third-party certified to the SFI Standard.
c. When referencing the products of a company with mills that do not all qualify for the certification mark, this fact must communicated (e.g. “only some of the mills producing ‘x’ product are qualified to use the SFI on-product label”).
d. If all the products in a product line are not certified, the label must accurately state this (e.g. “this label only applies to the cover of this publication”).

10.13. When the “At Least X% Certified Forest Content” label is being applied on solid wood products, the claim must read, “Product Line Contains At Least X% Certified Forest Content.” Artwork for this label is available upon request.

10.14. Use of the average percentage labels is contingent on the production batch having at least 10% *certified forest content*. If the level of certified content is less than 10%, a claim can be made stating this percentage, but label usage is prohibited.

10.15. When using the X% Chain of Custody label, the claims can be switched in order so “X% Certified Sourcing” or "X% Recycled Content” is first. Furthermore, *label users* can add the words, “At Least” in front of the "X% Certified Forest Content” claim.

10.16 *Label Users* can substitute the words "*Recycled content*" on the labels and replace it with *pre-consumer recycled* and/or *post-consumer recycled.*

10.17. Printers that are certified to the *SFI* Chain-of- Custody Standard and Associated Labels (Section 3 in the SFI requirements document) may use their chain-of-custody procedures to account for product that is approved for the Certified Sourcing Label, and label that product with the Certified Sourcing Label. These organizations must obtain documentation from their suppliers that the product is approved for the Certified Sourcing Label.

10.18. Publishers can work with a certified printer and do not need a separate chain-of-custody certification unless they are actually printing the publication.

10.19. Any public communication by *Certified Program Participants* and *label users* shall be accurate and consistent with applicable laws and requirements for SFI logo use. *Certified 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. *Label users* should consult with their legal counsel when preparing product advertising that includes an SFI on-product label or any other reference to the SFI program.

a. Point of purchase (POP) materials should avoid environmental claims that can be tied to the product. Rather, they should explain the SFI *Program Participant*’s voluntary participation in a program for sustainable forest management. Avoid references or suggestions that the *SFI* program preserves forests.
b. Avoid promoting any specific attributes of the product(s) bearing the mark when discussing participation in the SFI program, other than those related to forest management.
c. Organizations can make claims about other certified processes (e.g. soy ink or alternate power sources) as long as it is clear that this is not associated with the SFI certification.

10.20. A *Certified Program Participant* may refer to its conformance to the *SFI* Standard and its third-party certification in company promotional advertising, annual reports or other documents generally describing the company and its operations. However, if all company facilities and/or acreage/ hectares have not been certified, then the reference must be accurate as to the number of facilities and/or acreage/hectares that have been certified.

10.21. Label users that are not *Certified Program Participants* may refer to the fact that they have one or more facilities certified to the *SFI* chain-of-custody or fiber sourcing certifications in promotional advertising, annual reports or other documents generally describing the company and its operations. However, unless all company facilities have been certified, the reference must be accurate as to the number of facilities.

10.22. All advertising material must be sent to the SFI program's *Office of Label Use and Licensing* for review and approval. SFI staff are available to answer questions about the use of the marks and these rules.

10.23. The *Office of Label Use and Licensing* reserves the right to request samples of all uses of the Certification Marks from time to time.

10.24. If the *Office of Label Use and Licensing* determines that a label user is not using the marks as provided in these rules, which may be amended from time to time, or no longer meets the criteria set out in *Section 4 – Rules For Use Of SFI On-Product Labels*, it will send a written notice to the label user specifying the inappropriate use(s) and allow thirty (30) days in which to make a correction. If the label user fails to make the correction, the right to use the marks will be revoked.

10.25. *Label users* who observe misuse of any of these marks shall report this immediately to the *Office of Label Use and Licensing*.

10.26. When selling product as SFI chain-of-custody certified, the SFI chain-of-custody number must be added to one of the following documents: the label wrap, invoices, bill of lading, shipping documents, or letters during sale of product to the customer.

10.27. When using the SFI chain-of-custody X% content labels, the following rules must be taken into consideration:

i. The X% content label must equal all parts to 100%.
ii. If a specific attribute does not apply (e.g. *recycled content*), the company must remove that tagline from the label .
iii. If a company wishes to make a 100% certified sourcing claim, the certified sourcing label must be used.
iv. The *100% certified forest content* claim can be made only when the physical separation method has been used throughout the chain of custody process.

10.28. The organization approved to use the SFI on-product label can use either the color, black and white, or reversed style labels. Where one-color print is being used, the SFI label may be the same color as the rest of the product.

10.29. The size of the label can be determined by the certified company approved to use the SFI label.

10.30. If the label is being used on a small product (e.g. pencils) and the claim may not be legible, a company may apply to the *SFI Office of Label Use and Licensing* for additional exceptions on applying the SFI onproduct label.

10.31. The following taglines can be used in combination with SFI on-product labels and with promotional materials that may or may not include the SFI label. The SFI website (www.sfiprogram.org) can be added to any of these taglines.

i. The *Sustainable Forestry Initiative®* program promotes sustainable forest management.
ii. The *Sustainable Forestry Initiative®* program integrates the perpetual growing and harvesting of trees with the protection of wildlife, plants, soils, and water.
iii. This product is from a renewable, responsibly managed forest.
iv. The independent *Sustainable Forestry Initiative®* program is a North American standard committed to sustainable forest management.
v. The independent *Sustainable Forestry Initiative®* program is a non-profit charitable organization committed to the sustainable management of North American forests.

10.32. The following geographic taglines can be used in combination with the SFI on-product labels and with promotional materials that may or may not include the SFI label. A *certified Program Participant*, *primary* or *secondary producer* can only use these taglines if they successfully demonstrated to the *SFI certification body* conducting the SFI Section 3 chain of custody audit that they have tracked the sources of their supply, and that the wood fiber is sourced in North America in a manner consistent with the geographic tagline suggested. If a company sources any of its raw materials outside of North American, these claims can only be used if physical separation is employed. A 5% de minimis is acceptable.

i. This wood is from a responsibly managed [North American/U.S./Canadian] forest.
ii. The fiber in this paper/packaging product is from a responsibly managed [North American/ U.S./Canadian] forest.
iii. The fiber in this product meets the requirements of the independent *Sustainable Forestry Initiative®* program, delivering assurance that it comes from a responsibly managed [North American/U.S./Canadian] forest.

10.33. The *Office of Label Use and Licensing* reserves the right to refuse any label use that does not align with *SFI Inc.*'s strategic objective, which is to "ensure the SFI Standard is strong, grounded in science, progressive and based on integrity and proven through conservation collaboration resulting in wide market acceptance."

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
Primary producers who make SFI CoC claims and use the SFI label should be required to use the CoC label, not Certified Sourcing	Transparency and credibility		2	Comment is seems to imply that some *certified program participants* are making SFI CoC claims but using the SFI Certified Sourcing label. This is not allowed under the requirements of the SFI Chain of Custody. Only SFI CoC claims can be used with SFI CoC labels.	None

10.3, 10.4, 10.12.a, 10.25, 10.29, 10.32, 10.3 – The PEFC standard has been revised, and these references to PEFC Annex 4 and 5 are incorrect. 10.4 - Allow pre-consumer to be included with post-consumer in the mobius loop percentage. Conformance in the marketplace with PEFC and that other CoC standard. 10.12.a - This statement is very confusing and needs to be reworded. Clarify. 10.25 - Requiring immediate reporting of the misuse of "marks" is often not feasible or desirable. Often time and research is needed to discover the extent of the misuse, its cause, and initiate immediate corrective actions. 10.29 - This says the label size is determined by the company, but label rules do provide requirements, including minimum size. 10.32 - 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. Simplify. This statement is full of bonus information that may not be necessary.		10.3 - Reference the PEFC CoC standard, only, instead of specific sections. This would eliminate any future nonconformity in the standard if PEFC changes again with the next five years. 10.4 - Revised language: "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." 10.12 (a) - Proposed language: "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." 10.25 - Proposed language: "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." 10.29 - Proposed language: "The size of the label can be determined by the certified company, subject to the SFI label rules and approval by the SFI Office of Label Use and Licensing." Or just delete. 10.32 - Proposed language: 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 in the U.S. or Canada in a manner consistent with the geographic tagline selected. If a company sources any of its raw materials outside of the U.S and Canada, these claims can only be used if physical separation is employed. A 5% de minimis is acceptable"	2	The Task Group has reviewed the individual comments but does not find that the suggested revisions enhance the clarity of the existing language in the requirements of Part 11 of Section 4 SFI On-Product Label Use Rules.	Refer to SFI 2015-2019 Fiber Sourcing Standard Appx. 1, part 9.
Section 4, Part 10 "General Rules for use of SFI On-Product Labels", Paragraph 10.4 Delete the words "post consumer" when describing "recycled content".	Consistent with the Rules for Use of Chain of Custody Labels with Mobius Loop (Requirement Section 4, Part 9, Paragraph 9.3) and SFI Definition of "Recycled Content" (Section 13), use of the recycled Mobius loop on SFI labels is not limited to "post consumer" recycled content, but can include all recycled content.	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 Associated Labels (Sections 3 and 4), and can only be used to describe "recycled content" as described in SFI Definitions (Section 13) of the SFI requirements document.	2	Task Group has reviewed the comment and has recommended to SFI staff to verify that inclusion of *pre-consumer recycled content* in product that carries the Mobius loop conforms to FTC guidelines.	Refer to SFI 2015-2019 Section 5 - Rules for Use of SFI On-Product Labels and Off-Product Marks part 1.3.

Use this space to propose any removals or additions for the Rules for Use of SFI On-Product labels:

Comment	Comment Review	Rationale	Revised or Proposed New language

1 = final decision subject to review of language developed
2 = discussion required, comment may or may not be incorporated
3 = general comments, comments covered in other areas
4 = comments addressed by other SFI review task force

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.	3	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 issued.	None

SECTION 5. RULES FOR USE OF SFI OFF-PRODUCT MARKS

PREFACE

SFI Inc. is an independent, non-profit, charitable organization dedicated to promoting sustainable forest management in North America and supporting responsible procurement globally. The SFI Board is a three chamber Board of Directors representing environmental, social and economic interests equally, and the program addresses local needs through its grassroots network of 37 SFI Implementation Committees across North America. *SFI Inc.* directs all elements of the *SFI* program including the SFI forest standard, chain-of-custody certification, *fiber sourcing* requirements, labeling and marketing.

Consumers in growing numbers want assurance that their buying decisions represent a sound environmental choice. They are asking for proof that wood, paper and packaging products are made with raw materials sourced from *certified forest content* and *certified sourcing*. *Section 4 - Rules For Use Of SFI On-Product Labels* as well as the *SFI* Chain-of-Custody Standard and Associated Labels (Sections 3 and 4) deliver a reliable and credible mechanism so businesses can provide this assurance to their customers.

The *SFI* program meets guidelines on environmental claims in product advertising and communication issued by the U.S. Federal Trade Commission and guidelines on environmental labeling and advertising issued by the Competition Bureau of Canada.

Studies have shown that consumers appreciate the value of forest certification in helping them identify wood and paper products from legal, responsible sources. A 2008 survey by GfK Roper Public Affairs & Media and the Yale School of *Forestry* and Environmental Studies found that North American consumers believe it is important or essential to have eco-labels that describe the environmental impacts caused by the manufacture, use and disposal of products. Of 10 eco-labels tested in the United States, the SFI label had the highest familiarity rating of any forest certification program.

The fact that the SFI program can deliver a steady supply of fiber from well-managed forests is especially important at a time when there is increasing demand for green building and responsible paper purchasing, and only 10 percent of the world's forests are certified. The American Consumer Council says it supports the good work of the *SFI* program, and applauds the positive and progressive actions it is taking. A poll by TerraChoice Environmental Marketing found that procurement specialists included the SFI label on a list of the top 10 eco-labels they relied on frequently to make buying decisions.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
Given the importance of social investing and the rise of large social investment funds particularly important to REIT's, it seems appropriate to address such issues both here and throughout the SFI CoC.	The general consuming public is increasingly aware of social and labor issues and as such these should be addressed by SFI. In addition, PEFC requires compliance with the ILO core labor standards throughout it's C of C and addressing these issues would increase flexibility and options among all users.	Consumers in growing numbers want assurance that their buying decisions represent sound social and environmental choices. New Sentence: SFI is committed to sustainably managed forest products through its entire C of C based on economic, environmental, and social criteria.	2	The Task Group has reviewed the comment and believes that the current language continues to accurately reflect consumer expectations.	None

1: SFI LICENSED WORD MARKS

In addition to its on-product labels, the *SFI* program has off-product marks to show participation in the program and to promote the program generally. *SFI Inc.*owns all right, title and interest in these marks, and exercises legitimate control over their use.
There are two licensed work marks and one tagline mark, as well as two logo marks.
1. *SFI* LICENSED WORD MARKS:
* SUSTAINABLE *FORESTRY* INITIATIVE ®
* SFI ®

SFI Licensed Tagline Mark:
* GOOD FOR YOU, GOOD FOR OUR FORESTS ®
1. If a word mark is used in an advertisement or on the front page of a book, manual, report or other document, it should be distinguished by making it larger, bolder, in all caps or italics.

2. The first time a word mark is used in the text of a document, the words must be either in all caps, italics, bold or quotes. All caps, italics, and bold are preferred. Any subsequent uses can either continue with all caps, italics, bold, or quotes, or can be in initial caps (e.g. Sustainable *Forestry* Initiative).

3. The ® only needs to be included the first time "Sustainable *Forestry* Initiative " or "SFI" word marks appears in a document, whether it is in a title or in text. If both word marks are used, the correct format is: Sustainable Forestry Initiative ® (SFI ®) program.

4. A word mark must be an adjective, it cannot be a noun, so when it is used in text, the word **program** or **services** must appear after the mark. The mark should not be plural or possessive.

5. The tagline mark (Good For You, Good For Our Forests ®) can be used in association with the word marks.

6. In addition to the uses described below in General Rules for all *Program Participants*, the word marks may be used as follows, provided the advertisement or brochure refers to the SFI website (www.sfiprogram.org) or the *Program Participant's* website with a hotlink to the SFI website:
    a. in advertisements which promote the *Program Participant's products*; and
    b. in sales brochures and other similar product promotional items.

Before using the word marks in the manner authorized by this paragraph, the material must be submitted for review and approval by the *SFI Office of Label Use and Licensing*.

2. SFI LICENSED LOGO MARKS - FOR CERTIFIED PROGRAM PARTICIPANTS

7. Logo marks may **only** be used by *Program Participant*s in good standing whose operations have been **certified** by an *SFI certification body* to be in conformance with the *SFI 2010-2014 Standard*, *SFI Section 4 - Rules For Use of SFI On-Product Label* and/or the SFI Chain-of-Custody Standard (Section 3) in the SFI requirements document for all or a portion of their operations.

8. Logo marks may be used as described below under General Rules for all *Program Participant*s.

9. Logo marks may not be used in advertisements that promote a *Program Participant*'s products, in sales brochures or in any in-store material. This is only reserved for on-product labels.

10. The tagline mark (Good For You, Good For Our Forests®) may be placed beneath either logo mark.

11. Certified *Program Participant*s must provide samples of the use of the logo marks annually to the *SFI Office of Label Use and Licensing*.

3. GENERAL RULES -FOR ALL PROGRAM PARTICIPANTS

12. The logo and word marks may be used, subject to the rules in Parts A and B, as follows:

a. In image advertising that focuses on a summary of company accomplishments or values, on company people, on company financial results or stock performance, on company community activities, or any combination of the above. Except as provided in paragraph 6 of these rules, such advertising must not promote specific products, tout product attributes, or make value propositions, although generic products may be shown.
b. In communications which explain and/or promote the Sustainable Forestry Initiative program's services and a company's participation in the *SFI* program, both to employees and to those outside of the organization.
c. On business letterhead, business cards, and invoices.
d. In annual reports, provided there is a reference to the *SFI* program website (www.sfiprogram.org).
e. On generic business signs (e.g. vehicles, forest stands, office buildings, and mill sites that are owed or held on a *long-term* exclusive lease). Vehicles or facilities must be under the certified company's direct control and must prominently display the company's name. If the vehicle or facility is sold or the lease terminated, the marks must be removed before the title is transferred or the occupancy ends.
f. On clothing and protective gear (e.g. uniforms, shirts and hard hats), in conjunction with, but not attached to, the company's name or logo.
g. On a company website with a hotlink to the SFI website (www.sfiprogram.org).

13. If any of the marks are used in written communications, the following statement must be included in an appropriate location (e.g., bottom of the page or on the back of a brochure) "(set out Marks used) are registered marks owned by Sustainable Forestry Initiative Inc."

14. In addition to the references to the SFI website required above, companies should consider including a reference to the SFI website in any document where a logo or word mark is displayed.

15. The tagline mark can only be used as specified in Number 1 (SFI Licensed Word Marks and Number 2 (SFI Licensed Logo Marks - For certified *Program Participants*) of these rules.

16. Each mark is registered with the U.S. Patent and Trademark Office and in Canada, the European Union, Japan, China and South Korea, and must be accompanied by an ® to indicate that *SFI Inc.* owns it, unless otherwise authorized in these rules.

17. Any public communication by *Program Participants* or *label users* shall be accurate and consistent with applicable law and requirements for SFI logo use. *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. Legal counsel, as well as with the SFI *Office of Label Use and Licensing*, should be consulted during the preparation of any material that uses the marks and describes or makes claims about the *SFI* program and a company's participation.

18. *The Office of Label Use and Licensing* reserves the right to refuse any label use that does not align with *SFI Inc.*'s strategic objective, which is to "ensure the SFI Standard is strong, grounded in science, progressive and based on integrity and proven through conservation collaboration resulting in wide market acceptance."

19. *SFI Inc.* reserves the right to request samples of all uses of the marks from time to time, and has the right to disapprove any use of a mark that does meet the requirements indicated in SFI Sections 3, 4 and 5. Each *Program Participant* will be asked to identify a contact so SFI Inc. can direct inquiries and requests for sample use to that individual.

20. If *SFI Inc.* determines marks are not being used as provided in these rules, it will send a written notice specifying the inappropriate use(s) and allow thirty (30) days in which to make a correction. If corrections are not made, the right to use the marks will be revoked.

21. Any observed misuse of any of these marks should be reported immediately to the SFI *Office of Label Use and Licensing*.

22. The SFI program has marketing materials available on the members-only section of the SFI website (www.sfiprogram.org). Please contact the SFI *Office of Label Use and Licensing* for access to this section.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
12 - This requirement refers to “rules in Parts A and B”. We find no Parts A and B anywhere within any of the documents.			2	The Task Group has revised the formatting and nomenclature for this Section 5 SFI Rules for On-Product Label Use and Off Product Marks and has addressed the comment.	Refer to SFI 2015-2019 Section 5 - Rules for Use of SFI On-Product Labels and Off-Product Marks

APPENDIX 1: SFI OFF-PRODUCT MARK - ART RULES

The following Appendix will be updated to reflect all decisions made in the current revision cycle.

Horizontal Mark Stacked Mark

1 1/2" minimum width for mark | 1/4" minimum width for mark

4-color *SFI* Mark
Use CMYK color palette specs whenever four-color printing is available. Materials that fall into this category include advertising, collateral and sales materials, POS, and press materials.

4-color Mark (CMYK)

2-color *SFI Mark*
Use PMS 348 CVC and black when PMS color is available for materials such as brochures and catalogs.

2-color Mark (PMS 348)

1-color *SFI Mark*
Use B&W version of the marks when printing in black and white for materials such as laser print documents, and black and white ads.

1-color Mark (B&W)

Web-Safe Mark
Use jpeg or tiff for all website applications and PowerPoint presentations.

Web-Safe Mark (jpg & tif)

Reverse Mark
Use reverse version of the marks when applying them to dark backgrounds or over dark photographic images.

Reverse Mark

Typography
The *SFI* tagline text typeface is Garamond3 LT Italic, and the website text typeface is Universe. To maintain consistency, use only these fonts in all external communications.

Color Palette
The primary color palette consists of PMS 348 CVC and Black. Always match print jobs to color swatches to maintain consistency.

Use Web-safe specs for PowerPoint presentations and website graphics.

Comment	Comment Review	Rationale	Revised or Proposed New language

	A bit confusing, does the label change from what we are currently using? Does "certified sourcing" and our SFI# drop? In the paperboard packaging arena most of our business is repeat and changing the logo again will cost our customers thousands. Better explanation - do not change the logos for existing products.	3	No – there is no change proposed for the current Certified Sourcing label.	None

SECTION 6. GUIDANCE TO SFI 2015-2019 STANDARD

1. INTRODUCTION

SFI Inc. completes a review of its standard and supporting documents every five years, which is consistent with international protocols for forest certification standard revision cycles. The fourth public review, conducted in 2013-2014, led to the SFI 2015-2019 Standard and supporting documents.

This guidance document is intended to assist SFI *Certified Program Participants* and certification bodies in interpreting and implementing new and existing provisions in the *SFI 2015-2019 Standard*.

This document provides additional information that may help *Certified Program Participants* make management decisions to meet *SFI* Standard requirements. *SFI Inc.* routinely researches ways to improve the functionality of the *SFI* program; thus this document may be updated over time

2. OBJECTIVE 4: FORESTS WITH EXCEPTIONAL CONSERVATION VALUE

Objective 4 of the 2015-2019 *SFI Standard* extends the *biodiversity* requirements to *Forests with Exceptional Conservation Value* (FECV).

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.

Definition of *Forests with Exceptional Conservation Value: critically imperiled* (G1) and *imperiled* (G2) species and ecological communities.

***Critically imperiled**:* A plant or animal or community, often referred to as G1, that is globally extremely rare or, because of some factor(s), especially vulnerable to extinction. Typically, five or fewer occurrences or populations remain, or very few individuals (<1,000), acres (<2,000 acres or 809 hectares), or linear miles (<10 miles or 16 kilometers) exist (Further information can be found under descriptions of biodiversity hotspots and High-Biodiversity Wilderness Areas in Section 6 of the SFI requirements document).

***imperiled**:* A plant or animal or community, often referred to as G2, that is globally rare or, because of some factor(s), is very vulnerable to extinction or elimination. Typically, six to 20 occurrences, or few remaining individuals (1,000 to 3,000), or acres (2,000 to 10,000 acres or 809 to 4047 hectares), or linear miles (10 to 50 miles or 16 to 80.5 kilometers) exist.

In the United States and Canada, *SFI Certified Program Participants* can use the NatureServe database to identify species and communities for protection. Learn more about NatureServe conservation Status Assessments at www.natureserve.org/publications/ConsStatusAssess_StatusFactors.jsp.

2.1 NatureServe Resources for Global and Occurrence Ranks

Identification and protection of critically *imperiled* and *imperiled species* and communities is a step-wise process. First, NatureServe determines the global rank, which reflects the rarity/imperilment of the species or community. Then it assesses the estimated viability, or probability of persistence, of particular occurrences of *critically imperiled* and *imperiled* species and communities. A viable species or community is one that is of sufficient quality to likely survive long-term. Clearly, little *conservation* benefit is gained unless protected occurrences have a good likelihood of long-term survival.

NatureServe inventory and *conservation* activities focus on locating, maintaining records on, and working with partners to conserve viable occurrences of conservation elements. NatureServe/ Natural Heritage Programs rank viability of element occurrences (community or species) using standard methodologies to yield an element occurrence ranking. A standard set of Element Occurrence Rank Specifications is developed and maintained for each element, and then applied against individual occurrences of the element.

The basic element occurrence ranks are:

A: Excellent estimated viability
B: Good estimated viability
C: Fair estimated viability
D: Poor estimated viability
E: Verified extant (viability not assessed)
H: Historical
F: Failed to find
X: Extirpated

The *SFI Standard* requires that *Certified Program Participants* have "plans to locate and protect known sites associated with viable occurrences of *critically imperiled* and *imperiled* species and communities."

Under the *SFI 2015-2019 Standard*, occurrences of *critically imperiled* and *imperiled* species and communities ranked as A and B are to be protected. C-ranked occurrences should be reviewed and addressed on a case-by-case basis. If they have greater potential to be viable (C+), they should be protected. If there is less potential for viability (C-), they are to be managed at the *Certified Program Participant's* discretion.

Element occurrences with poor estimated viability (D) would not be protected under the *SFI Standard*. A D rank might result because the acreage of a community or the population of a species is too small, the quality is very low, and/or the ecological processes required to maintain the occurrence are fundamentally altered and un-restorable. E-ranked occurrences (viability not assessed) should be presumed viable and protected until assessed and determined to be of C- or D quality. Occurrences ranked F are not covered under the *SFI Standard* since only known occurrences are included. Historical (H) and extirpated (X) occurrences are clearly nonviable, and no protection activity is warranted.

In determining the viability and potential to protect occurrences, *Certified Program Participants* are encouraged to seek additional information on occurrence ranking from NatureServe (www.natureserve.org/prodServices/eodraft/5.pdf) and/or collaborate with qualified conservation experts.

2.2 Occurrence Quality

The following material provides additional information on the standards and methodologies employed by NatureServe in determining the quality or viability of occurrences.

For an ecological assessment, scientists and managers want to know if each occurrence is of sufficient quality, or feasibly restorable, before including it in management planning. With adequate information, ecologists evaluate and rate the quality of element occurrences using criteria grouped into three categories: size, condition, and landscape context.

Characterizing the quality of an occurrence provides the basis for assessing stresses - the degradation or impairment - of element occurrences at a given site. To assess the quality of element occurrences, ecologists must identify the key ecological factors (ecological processes, population abundance, disturbance regimes, composition and structure, etc.) that support them. Once these are identified, it is possible to describe their expected ranges of variation and assess whether the on-site factors are within those ranges or requires significant effort to be maintained or restored to its desired status.

Key ecological factors vary by element type, but all are grouped into three categories of size, condition and landscape context. Each of these three categories is reviewed and ranked for each occurrence as A (excellent), B (good), C (fair) and D (poor). The break between C and D establishes a minimum quality threshold for occurrences. Occurrences ranked D are typically presumed to be beyond practical consideration for ecological restoration. In subsequent management planning, these ranks and underlying criteria aid in focusing *conservation* activities and measure progress toward local *conservation* objectives.

Definitions of these categories are:

Size is a measure of the area or abundance of the *conservation* element's occurrence. It may simply be a measure of the occurrence's patch size or geographic coverage, and it may also include an estimate of sub-population size or density. Minimum dynamic area, one aspect of size, is the area needed to ensure survival or re-establishment of a population or community after natural disturbance.

Condition is an integrated measure of the composition, structure and biotic interactions that characterize the occurrence. This includes factors such as reproduction, age structure, biological composition (e.g. presence of native versus *invasive exotic plants* and *animals*; presence of characteristic patch types), physical and spatial structure (e.g. canopy, understory and groundcover; spatial distribution and juxtaposition of patch types or seral stages in an ecological system), and biotic interactions that directly involve the element (e.g. competition and disease).

Landscape context measures two factors: the dominant environmental regimes and processes that establish and maintain the element occurrence, and connectivity. Dominant environmental regimes include hydrologic and water chemistry regimes (surface and groundwater), geomorphic processes, climatic regimes (temperature and precipitation), fire regimes, and natural disturbances. Connectivity includes such factors as species elements having access to *habitats* and resources needed for lifecycle completion, fragmentation of ecological communities and systems, and the ability of any element to respond to environmental change through dispersal, migration, or re-colonization. Criteria for ranking ecological communities vary by type. In many instances, criteria are developed for ecological systems, then modified (mostly with size attributes) for application to occurrences of individual rare plant associations that may occur among the more broadly defined ecological system.

	Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language

	SFI continues to point to Forests of Exceptional Conservation Value (FECV) as their analogue to High Conservation Value Forests. However, the FECV definition is limited to critically imperiled and imperiled species and communities. As such, FECV is currently a stand-level conservation concept. 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.		2	The Task Group has reviewed the comment and believes that new Indicator 4.1.5 addresses the comment. Indicator 4.1.5 requires a program to address conservation of known sites with viable occurrences of significant species of concern. The intent of indicator 4.1.5 is for *Certified Program Participant* to; (1) evaluate conservation of species or communities that are not state, provincially or federally threatened or endangered or ranked G1 or G2; (2) select appropriate species of concern that are significant; and (3) incorporate conservation actions for the selected species into management. It is recognized that lists of "special concern species", "rare species", "species of greatest conservation need", or similarly described lists have been published by state/provincial or federal agencies or others. Such lists may serve as a source of information on potential significant species of concern. When determining whether or not a species is significant, a *Certified Program Participant* may consider rarity, regional importance, and sensitivity to, or reliance upon, forest management activities. Resources for determining rarity may include Nature Serve G or S ranks, International Union for Conservation of Nature Red List and federal, provincial or state lists. Resources for determining regional importance may include The Nature Conservancy Eco-regional Plans, State Wildlife Action Plans or other credible conservation plans. The intent is for conservation to occur on *Certified Program Participant* lands. Occurrence information can be drawn from Nature Serve, State/Provincial Natural Resource Agencies, Conservation Data Centre and other eco-regional mapping efforts.	Refer to SFI 2015-2019 Forest Management Standard Ind. 4.1.5 and Section 6 Guidance

3. OBJECTIVE 4: WILDLIFE HABITATS DIVERSITY AND INVASIVE EXOTIC PLANTS AND ANIMALS

Objective 4 includes performance measures and indicators for conservation of biological diversity. Additional information is provided here for *wildlife habitats* diversity and *invasive*

exotic plants and animals.

3.1 *Wildlife Habitats* Diversity

Programs to promote *conservation* of *biological diversity* should recognize the value of a diversity of habitats to support fish and *wildlife habitats*. Early successional forest stages, for example, are particularly lacking in certain regions of the U.S. and Canada, and managing for them can aid in preventing the decline of species dependent on them (e.g. ruffed grouse). Historically, fires and other natural disturbances created forest openings and the types of *habitat* needed by these early succession forest dependent species. As forests across the landscape mature, this type of *habitat* declines in abundance. However, it can easily be created by proper selection of harvesting methods including clearcutting and the use of prescribed fire.

3.2 *Invasive Exotic Plants and Animals*

According to the U.S. Department of Agriculture Animal and Plant Health Inspection Service, *invasive exotic plants and animals* are "any species, including its seeds, eggs, spores, or other biological material capable of propagating that species, that is not native to that ecosystem, whose introduction does or is likely to cause economic or environmental harm or harm to human health." Examples would include gypsy moth and kudzu, but not the barred owl.

SFI Certified Program Participants should become knowledgeable about *invasive exotic plants* and *animals* within their area of operation. The expectation is that they will participate in cooperative efforts by others (e.g. government agencies or non-government environmental organizations) and work proactively within their own programs (e.g. erosion control or seed selection for wildlife plots) to limit the introduction, impact and spread of *invasive exotic plants and animals*. Indicator 4.1.6 does not require an *SFI Certified Program Participant* to eliminate invasive exotic plants and animals on their land. In some places *invasive exotic plants and animals* are well established and eradication by the *SFI Certified Program Participants* is unrealistic.

Experts in this area believe the most effective means of addressing *invasive exotic plants and animals include*:

a. awareness building,
b. monitoring,
c. preventing new introductions, and
d. eliminating new occurrences.

SFI Certified Program Participants should emphasize these as priorities in their programs. Forest practices that reduce the abundance of *invasive exotic plants and animals* are preferred if they can be addressed within the context of the *SFI Certified Program Participant's* overall management objectives.

4. OBJECTIVE 10: BEST MANAGEMENT PRACTICES MONITORING

Objective 10 of the *SFI 2015-2019 Standard* calls for adherence to *Best Management Practices*: "To broaden the practice of sustainable *forestry* through the use of *best management practices* to protect water quality."

The use of *best management practices* to protect water quality is a critical component of sustainable forest management and is emphasized in the *SFI Standard* with requirements for on-the-ground management, monitoring, training and research. The *SFI 2010-2014 Standard* strengthened requirements for *best management practices* application with a new indicator:

"10.1.2 Use of written agreements for the purchase of raw material sourced directly from the forest is required and must include provisions requiring the use of best management practices."

While it is not practical to have auditing requirements that go beyond reviewing *Certified Program Participants'* contracts for purchasing raw material from their suppliers to ensure they do require the use of *best management practices*, this new indicator will further highlight the importance of best management practices and their use by all suppliers throughout the supply stream.

	Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
	What if your mill relies heavily on gatewood? There isn't always a contract to amend.			2	The Task Group has reviewed the comment and believes that the comment is addressed by Section 3 Indicators 2.1.2.	Refer to SFI 2015-2019 Fiber Sourcing Standard PMs 2.1.

5. OBJECTIVE 12: BIODIVERSITY HOTSPOTS AND HIGH-BIODIVERSITY WILDERNESS AREAS

Objective 12 of the *SFI 2015-2019 Standard* calls for *fiber sourcing policies* that promote conservation of forests and *biodiversity* in areas outside of the United States and Canada identified as *biodiversity hotspots* and *high-biodiversity wilderness areas*.

Objective 12. Promote C*onservation 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*.

Performance Measure 12.1. *Certified Program Participants* shall ensure that their *fiber sourcing programs* support the *principles* of *sustainable forestry*, including efforts to promote *conservation* of *biological diversity*.

Indicator: 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 World Resources Intitute, the *Alliance for Zero Extinction*, World Wildlife Fund, and International Union for Conservation of Nature.

This document provides additional information drawn from C*onservation International*, the *Alliance for Zero Extinction*, World Wildlife Fund, World Resources Institute and the International Union for conservation of Nature to aid *SFI Certified Program Participants* in implementing these requirements.

Areas identified by any of these organizations may be wholly or partially within the United States and Canada. For the purposes of the *SFI Standard*, these areas are addressed by NatureServe or equivalent processes to identify *critically imperiled* and *imperiled* species and communities in North America (see earlier section regarding Objective 4: *Forests with Exceptional Conservation Value*).

Compliance with the *SFI 2015-2019 Standard* does not mean that that *Program Participants* must cease all raw material or procurement activities from all unmanaged forests within these areas. Rather, the emphasis is on seeking assurance that fiber and logs are secured from areas harvested legally, and avoiding actions that serve to cause or encourage further destruction of remaining original primary vegetation. Working to increasingly meet fiber and wood production needs from plantations and managed forests enhances efforts to protect remaining biologically diverse *habitats*. *Certified Program Participants* can work with *conservation* organizations, government entities and others to provide additional guidance on aligning business and *conservation* objectives within these regions.

5.1 *Biodiversity Hotspots* and *High-Biodiversity Wilderness Areas*

Since 2002, the *SFI* program has relied on Conservation International's definitions of *biodiversity hotspots* and *high-biodiversity wilderness areas* (formerly major tropical wilderness areas) to identify areas of potential concern for Certified Program Participants who source fiber from overseas. Conservation International (www.conservation.org) seeks to empower societies to responsibly and sustainably care for nature for the well-being of humanity through a strong foundation of science, partnership and field demonstration. Conservation International maintains a list of global priority areas with exceptional biological value, and works to protect them.

5.1.a *Biodiversity Hotspots*

The *biodiversity hotspots* hold especially high numbers of endemic species, yet their combined area of remaining *habitat* covers only 2.3 percent of the Earth's land surface. Each hotspot faces extreme threats and has already lost at least 70 percent of its original natural vegetation. Over 50 percent of the world's plant species and 42 percent of all terrestrial vertebrate species are endemic to the 34 *biodiversity hotspots*.

<u>Africa and Madagascar</u>
(www.*conservation*.org/explore/africa_madagascar/pages/priorities.aspx)

CAPE FLORISTIC REGION Evergreen fire-dependent shrublands characterize the *landscape* of the Cape Floristic Region.

COASTAL FORESTS OF EASTERN AFRICA Though tiny and fragmented, the forest remnants that make up the Coastal Forests of Eastern Africa contain remarkable levels of biodiversity.

EASTERN AFROMONTANE The mountains of the Eastern Afromontane hotspot are scattered along the eastern edge of Africa, from Saudi Arabia in the north to Zimbabwe in the south.

GUINEAN FORESTS OF WESTERN AFRICA The lowland forests of West Africa are home to more than a quarter of Africa's mammals, including more than 20 species of primates.

HORN OF AFRICA The arid Horn of Africa has been a renowned source of biological resources for thousands of years.

MADAGASCAR & THE INDIAN OCEAN ISLANDS Madagascar and its neighboring island groups have an astounding total of eight plant families, four bird families, and five primate families that live nowhere else on Earth.

MAPUTALAND-PONDOLAND-ALBANY Maputaland-Pondoland-Albany, which stretches along the east coast of southern Africa below the Great Escarpment, is an important center of plant endemism.

SUCCULENT KAROO The Succulent Karoo of South Africa and Namibia boasts the richest succulent flora on earth, as well as remarkable endemism in plants.

Asia-Pacific(www.*conservation*.org/explore/priority_areas/hotspots/asia-pacific/Pages/asia-pacific.aspx)

EAST MELANESIAN ISLANDS Once largely intact, the 1,600 East Melanesian Islands are now a hotspot due, sadly, to accelerating levels of habitat loss.

HIMALAYA The Himalaya Hotspot is home to the world's highest mountains, including Mount Everest.

INDO-BURMA Encompassing more than two million square kilometers of tropical Asia, Indo-Burma is still revealing its biological treasures.

JAPAN The islands that make up the Japanese Archipelago stretch from the humid subtropics in the south to the boreal zone in the north, resulting in a wide variety of climates and ecosystems.

MOUNTAINS OF SOUTHWEST CHINA With dramatic variations in climate and topography, the Mountains of Southwest China support a wide array of habitats including the most endemic-rich temperate flora in the world.

NEW CALEDONIA An island the size of New Jersey in the South Pacific Ocean, New Caledonia is the home of no less than five endemic plant families.

NEW ZEALAND A mountainous archipelago once dominated by temperate rainforests, New Zealand harbors extraordinary levels of endemic species.

PHILIPPINES More than 7,100 islands fall within the borders of the Philippines hotspot, identified as one of the world's biologically richest countries.

POLYNESIA-MICRONESIA Comprising 4,500 islands stretched across the southern Pacific Ocean, the Polynesia-Micronesia hotspot is the epicenter of the current global extinction crisis.

SOUTHWEST AUSTRALIA The forest, woodlands, shrublands and heath of Southwest Australia are characterized by high endemism among plants and reptiles.

SUNDALAND The spectacular flora and fauna of the Sundaland Hotspot are succumbing to the explosive growth of industrial forestry in these islands.

WALLACEA The flora and fauna of Wallacea are so varied that every island in this hotspot needs secure protected areas to preserve the region's biodiversity.

WESTERN GHATS & SRI LANKA Faced with tremendous population pressure, the forests of the Western Ghats and Sri Lanka have been dramatically impacted by the demands for timber and agricultural land.

Europe and Central Asia (www.*conservation*.org/explore/europe_central_asia/pages/priorities.aspx)

CAUCASUS The deserts, savannas, arid woodlands and forests that comprise the Caucasus hotspot contain a large number of endemic plant species.

IRANO-ANATOLIAN Forming a natural barrier between the Mediterranean Basin and the dry plateaus of Western Asia, the mountains and basins that make up the Irano-Anatolian Hotspotcontain many centers of local endemism.

MEDITERRANEAN BASIN The flora of the Mediterranean Basin is dramatic. Its 22,500 endemic vascular plant species are more than four times the number found in all the rest of Europe.

MOUNTAINS OF CENTRAL ASIA Comprising two of Asia's major mountain ranges, the Mountains of Central Asia were known to early Persians as the "roof of the world."

North and Central America(www.*conservation*.org/explore/priority_areas/hotspots/north_central_america/Pages/north_central_america.aspx)

CALIFORNIA FLORISTIC PROVINCE The California Floristic Province is a zone of Mediterranean type climate and has the high levels of plant endemism characteristic of these regions.

CARIBBEAN ISLANDS The Caribbean Islands support exceptionally diverse ecosystems, ranging from montane cloud forests to cactus scrublands, which have been devastated by deforestation and encroachment.

MADREAN PINE-OAK WOODLANDS Encompassing Mexico's main mountain chains, and isolated mountaintop islands in Baja California and the southern United States, the Madrean Pine-Oak Woodlands is an area of rugged mountainous terrain, high relief and deep canyons.

MESOAMERICA The Mesoamerican forests are the third largest among the world's hotspots. Their spectacular endemic species include quetzals, howler monkeys and 17,000 plant species.

South America(www.*conservation*.org/explore/priority_areas/hotspots/south_america/Pages/south_america.aspx)

ATLANTIC FOREST The Atlantic Forest of tropical South America boasts 20,000 plant species, 40 percent of which are endemic.

CERRADO The Cerrado region of Brazil, comprising 21 percent of the country, is the most extensive woodland-savanna in South America.

CHILEAN WINTER RAINFALL-VALDIVIAN FOREST A virtual continental island bounded by the Pacific Ocean, the Andes Mountains and the Atacama Desert, the Chilean Winter Rainfall-Valdivian

Forest harbors richly endemic flora and fauna.

TROPICAL ANDES The richest and most diverse region on Earth, the Tropical Andes region contains about a sixth of all plant life in less than one percent of the world's land area.

TUMBES-CHOCÓ-MAGDALENDA Tumbes-Chocó-Magdalena is bordered by two other hotspots: Mesoamerica to the north and the Tropical Andes to the east.

5.1.b *High-Biodiversity Wilderness Areas*(www.*conservation*.org/explore/priority_areas/wilderness/Pages/default.aspx)

High-biodiversity wilderness areas are areas where the vegetation is still over 70 percent intact.

AMAZONIA Spanning nine South American countries, the Amazonia wilderness is unlike any other, supporting more than 40,000 species of plants, with three-quarters of them found nowhere else.

CONGO BASIN Seven African nations share the second-largest expanse of tropical wilderness in the world. Unlike other *landscape*s in the region, a great portion of the remote Congo Basin forests have remained intact.

NEW GUINEA The world's biggest tropical island and its outlying islands contain the largest remaining wilderness in the entire Asia-Pacific. New Guinea and its neighbors are home to thousands of species known to science, and possibly many yet to be discovered.

NORTH AMERICAN DESERTS This arid, mostly desert region covering northern Mexico and the southwestern United States contains more unique species than any other desert on the planet, including the majority of all known cactus species.

MIOMBO-MOPANE WOODLANDS AND SAVANNAS OF SOUTHERN AFRICA Quite possibly the single largest block of dry woodlands in the world, this wilderness region stretches across 10 countries, supporting large numbers of wildlife and people who depend on its natural resources.

5.2 Resources for the Conservation of Biological Diversity

The following table provides information on each organization referenced in Indicator 12.1.b in the *SFI Standard*. This information is intended to provide background information on each resource and internet links are provided for further details.

		conifers (many sites have more than one *AZE* "trigger species" confined to them). Additionally, *AZE* uses the following criteria to identify priority sites (a site must meet all three to qualify): Endangerment, Irreplaceability, and Discreteness.	
International Union for the *Conservation* of *Biodiversity* (IUCN) (http://www.iucn.org/what/*biodiversity*/)	IUCN's work on *biodiversity* includes comprehensive research on the status of *biodiversity* and thousands of individual animal and plant species; action to protect specific species; managing and restoring natural areas, national parks and other protected areas; and promoting the sustainable use of natural resources. IUCN also provides the knowledge, standards and tools for *biodiversity conservation* for governments, community organizations, the United Nations and business. The IUCN Species Programme, working with the IUCN Species Survival Commission, has for more than four decades been assessing the *conservation* status of species, subspecies, varieties and even selected subpopulations on a global scale in order to highlight taxa threatened with extinction, and therefore promote their *conservation*.	The IUCN Red List of Threatened Species™ provides taxonomic, *conservation* status and distribution information on plants and animals that have been globally evaluated using the IUCN Red List Categories and Criteria. The main purpose of the IUCN Red List is to catalogue and highlight those plants and animals that are facing a higher risk of global extinction (i.e. those listed as Critically Endangered, Endangered and Vulnerable). The IUCN Red List also includes information on plants and animals that are categorized as Extinct or Extinct in the Wild; on taxa that cannot be evaluated because of insufficient information (i.e. are Data Deficient); and on plants and animals that are either close to meeting the threatened thresholds or that would be threatened were it not for an ongoing taxon-specific *conservation* programme (i.e. are Near Threatened).	Access the *conservation* status of species here: http://www.iucnredlist.org/ A how-to guide to the IUCN Red List: http://www.iucnredlist.org/documents/redlist_website_users_guide.pdf
World Resources Institute (WRI) Intact Forest Landscapes (http://www.intactforests.org/)	An Intact Forest Landscape (IFL) is an unbroken expanse of natural ecosystems within the zone of current forest extent, showing no signs of significant human activity, and large enough that all native *biodiversity*, including viable populations of wide-ranging species, could be maintained. The IFL concept and its technical definition were introduced to help create, implement and monitor policies concerning the human impact on forest landscapes at the regional or country levels. The essence of the approach is to use high spatial resolution satellite	An IFL is an unbroken expanse of natural ecosystems within the zone of current forest extent, showing no signs of significant human activity and large enough that all native *biodiversity*, including viable populations of wide-ranging species, could be maintained. Although all IFL are within the forest zone, some may contain extensive naturally tree-less areas, including grasslands, wetlands, lakes,	The global IFL map can be found here: http://www.intactforests.org/world.map.html

Organization & Website	Overview of Organization & Goals	How Sites are Classified	For More Information
Alliance for Zero Extinction (*AZE*) (http://www.zeroextinction.org)	*AZE* is a joint global initiative of 52 *biodiversity conservation* organizations, aimed to prevent extinctions by identifying and safeguarding key sites where species are in imminent danger of disappearing. Its goal is to create a front line of defense against extinction by eliminating threats and restoring habitat to allow species populations to rebound. The purpose of the Alliance is to identify sites in most urgent need of *conservation*, and to act together to prevent species extinctions.	*AZE* has identified the last remaining sites for the world's most highly threatened species, 93 percent of which are threatened primarily by habitat destruction. The data gathering process was performed over a period of many months with input from regional experts, as well as experts in the five *AZE* taxa (mammals, birds, reptiles, amphibians and conifers) from around the world. The data was verified using existing databases such as the IUCN Red List, BirdLife International's global database, and the Global Amphibian Assessment. *AZE* scientists, working in collaboration with an international network of experts, have so far identified 595 such sites that must be effectively protected to prevent the extinction of 794 of the world's most threatened species including mammals, birds, some reptiles (crocodilians, iguanas, turtles and tortoises), amphibians and	The Alliance for Zero Extinction has released an updated set of sites, coinciding with the 2010 meeting of the parties on the Convention on Biological Diversity in Nagoya, Japan. http://www.zeroextinction.org/sitesspecies.htm

	information to establish the boundaries of large undeveloped forest areas, and use these boundaries as a baseline for monitoring. Developed by a group of non-governmental environmental organizations (Greenpeace, World Resources Institute, Global Forest Watch, Biodiversity Conservation Center, International Socio-Ecological Union, and Transparent World), the IFL concept, mapping and monitoring algorithms have been used both in regional and global forest monitoring projects and in scientific research.	alpine areas and ice. This definition builds on the definition of Frontier Forest developed by WRI (Bryant et al., 1997). Technically, an IFL is defined as a territory within today's global extent of forest cover which contains forest and non-forest ecosystems minimally influenced by human economic activity, with an area of at least 500 km2 (50,000 ha) and a minimal width of 10 km (measured as the diameter of a circle that is entirely inscribed within the boundaries of the territory). Areas with evidence of certain types of human influence are considered disturbed, and consequently not eligible for inclusion, e.g. settlements, transportation infrastructure such as roads, railways, pipeline and power transmission lines; agriculture and timber production; industrial activities during the last 30 to 70 years, such as logging, mining, oil and gas exploration and extraction and peat extraction.	
World Wildlife Fund (WWF) (http://www.worldwildlife.org/science/ecoregions/global200.html)	WWF uses the best available scientific knowledge to preserve the diversity and abundance of life on Earth and the health of ecological systems, by: • protecting natural areas and wild populations of plants and animals, including endangered species; • promoting sustainable approaches to the use of renewable natural resources; and • promoting more efficient use of resources and energy and the maximum reduction of pollution WWF's Global 200 attempts to identify a set of ecoregions whose *conservation* would achieve the goal of saving a broad diversity of the Earth's ecosystems. These ecoregions include those with exceptional levels of *biodiversity*, such as high species richness or endemism, or those with unusual ecological or evolutionary phenomena. WWF, in collaboration with the National Geographic Society developed an interactive map and descriptions of the Global 200 available through a Wild World website.	WWF researchers analyzed global patterns of *biodiversity* to identify a set of the Earth's terrestrial, freshwater and marine ecoregions that harbor exceptional *biodiversity* and are representative of its ecosystems. They placed each of the Earth's ecoregions within a system of 30 biomes and biogeographic realms to facilitate a representation analysis. *Biodiversity* features were compared among ecoregions to assess their irreplaceability or distinctiveness. These features included species richness, endemic species, unusual higher taxa, unusual ecological or evolutionary phenomena, and the global rarity of habitats. This process yielded 238 ecoregions – the Global 200 – comprising 142 terrestrial, 53 freshwater and 43 marine priority ecoregions. Ecoregions were also assigned a conservation status, with those most at-risk assigned "critical" or "endangered".	Global 200 maps can be found at (http://www.nationalgeographic.com/wildworld/) Descriptions of each Global 200 ecoregion: http://www.nationalgeographic.com/wildworld/profiles/g200_index.html WWF Wildfinder Tool: http://worldwildlife.org/science/wildfinder/	

6. Objectives 11 and 17: Certified Logging Professionals and Use of Trained Loggers

6.1 Certified Logging Professionals

SFI Inc. recognizes the potential and value in promoting the use of certified logging professionals, and the SFI 2015-2019 Standard encourages their use with revisions made to indicators under performance measure 11.1 and performance measure 17.1.

"11.1.2 List of certified logging professionals and qualified logging professionals maintained by Certified Program Participant, state or provincial agency, loggers' association or other organization."

"17.1.5 Program to promote the use of certified logging professionals (where available), qualified resource professionals and qualified logging professionals."

Certified logging professional programs are in their infancy in terms of their development and are not in widespread use. The SFI 2015-2019 Standard recognizes these limitations while encouraging their use by *Certified Program Participants* where they are available and after consideration of other factors involved in developing contractual relationships. Certified logging professionals are those professionals who have completed SFI Implementation Committee approved training programs and who have also successfully completed and are members in good standing of a credible certified logging professional program recognized by the SFI Implementation Committee.

SFI Implementation Committees will review, when requested, certified logging professional programs to determine if they meet the criteria in indicator 17.2.3. This process is identical to the one currently in use by SFI Implementation Committees for evaluating credible logger training programs.

17.2.3 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 of 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.

6.2 Use of Trained Loggers

Logger training is a very effective tool in promoting sustainable forest management, and has been a key component of the SFI Standard since its inception. The SFI 2015-2019 Standard strengthened requirements for logger training with revisions to 11.1.1, 17.1.5, 17.2.1 and 17.2.2

"11.1.1. Program to promote the use of certified logging professionals (where available), qualified resource professionals and qualified logging professionals."

"17.1.5. Certified Program Participants shall have written agreements for the use of certified logging professionals (where available) or wood producers that have completed training programs and are recognized as qualified logging professionals. "

"17.2.1. Participation in or support of SFI Implementation Committees to establish criteria and identify delivery mechanisms for wood producers' training courses and periodic continuing education 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. Awareness of rare forested natural communities as identified by provincial or state agencies, or by credible organizations such as NatureServe, The Nature Conservancy, etc.
f. logging safety;
g. 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;
h. transportation issues;
i. business management;
j. public policy and outreach; and
k. awareness of emerging technologies.

"17.2.2 The SIC-approved wood producer's training programs shall have a continuing education component with coursework that supports the current logger training programs, safety and the principles of sustainable forestry."

Program is defined in the SFI 2015-2019 Standard as an organized system, process or set of activities to achieve an objective or performance measure. Indicators 11.1.1 and 17.1.5 requires Certified program participants to develop a program for the purchase of their raw material from logging professionals who have completed training programs. They should strive to limit their deliveries from untrained loggers to no more than 5% with allowances for turnover in the logging workforce, availability, timing and length of training programs, other wood suppliers (defined as a person or organization who infrequently supplies wood fiber on a small scale, such as farmers and small-scale land-clearing operators), and availability of trained logging professionals locally. This cap on deliveries by untrained loggers also needs to recognize that catastrophic events (severe storms, wildlife, beetle epidemics) can result in large-scale salvage efforts over comparatively short periods of time which can result in increased deliveries by untrained loggers.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
The QLP definition doesn't account for Canada's legislation which is a higher standard	No numeric target OR revise the definition of QLP to include the role of the Canadian legislation.		2	Task Group has reviewed the comment and is of the opinion that the comment ignores the fact that there are many jurisdictions with legislations governing forest management. The Task Group has revised the definition of Qualified Logging Professionals as well as the guidance for deliveries by untrained loggers.	Refer to Section 6 – Guidance part 10 and Section 13 – Definitions.
"Infancy" is inaccurate and demeaning	Remove "infancy"		1	Edit made to Section 6 - Guidance	Refer to Section 6 – Guidance part 10
No change is proposed	Although the 5% de minimis is presented as an aspirational target there is concern in Western Canada that this could eventually transition to a hard target due to the poor fit of the SFI standard when it comes to logger training in Western Canada. The current standard and definition of qualified logging professioanl will need a major overhaul to adequally address the Canadian context if the de minimus target is ever adopted into the standard. The stanrdard would also need to be modified to better address other certifed sources, such as CSA; which is currently done through an interpretation in the WCSIC Training Policy.	No change is proposed	2	Task Group has reviewed the comment and believes that the revised guidance language regarding deliveries by untrained loggers addresses the comment.	Refer to Section 6 – Guidance part 10
This requirement discriminates against the small landowner	Don't define a percentage		2	Task Group has reviewed the comment and believes that the revised guidance language regarding deliveries by untrained loggers addresses the comment.	Refer to Section 6 – Guidance part 10
Non-QLP fiber is still good wood	Change to 10%		2	Task Group has reviewed the comment and believes that the revised guidance language regarding deliveries by untrained loggers addresses the comment.	Refer to Section 6 – Guidance part 10
If this is important, move to standard.			2	Task Group has reviewed the comment but does not support addressing deliveries by untrained loggers in normative language.	None
At what level is this achieved? Clarify it is at the company level.			3	This comment is related to reporting of the "deliveries by untrained loggers" figure on the *Certified Program Participant* Annual Progress Report submitted to SFI Inc.	None

This could interfere with trade. Where did the 5% come from? how verified? Can this be verified in the due diligence system? Sounds like Chain of Custody. What was the intent, the problem being addressed; it doesn't allow for multiple sourcing patterns	Tie it to people who directly buy wood from woods – and not dealer…. OR remove the 5% clause		2	Task Group has reviewed the comment and believes that the revised guidance language regarding deliveries by untrained loggers addresses the comment.	Refer to Section 6 – Guidance part 10
Is this auditable? Cap (%) is too small	Change to 10% to meeting the intent of continual improvement while allowing flexibility and auditability.		2	Task Group has reviewed the comment and believes that the revised guidance language regarding deliveries by untrained loggers addresses the comment.	Refer to Section 6 – Guidance part 10
Guidance 6.2 for 17.2.2 – "no more than 5%". Too constraining - remove the amount.			2	Task Group has reviewed the comment and believes that the revised guidance language regarding deliveries by untrained loggers addresses the comment.	Refer to Section 6 – Guidance part 10
Confusion on the link between Standard and Guidance – how do auditors know to go to Guidance on this? If the 5% is important it should be in Standard. Where is the link between the Standard and the Guidance.	Clarify to auditors that this is not a requirement AND find a way to direct auditors to Guidance.		3	Comment highlights the fact that some Certification Bodies are treating this as a normative requirement. This is language is attended as guidance.	None
"no more than 5%" - Hard to meet this, particularly in hardwood mills in the US and the extreme shortage of loggers. Also hard to audit the "allowances".	Remove any percentage amount		2	Task Group has reviewed the comment and believes that the revised guidance language regarding deliveries by untrained loggers addresses the comment.	Refer to Section 6 – Guidance part 10
Auditors will audit this as a requirement.	Keep existing language (no change)		2	Task Group has reviewed the comment and believes that the revised guidance language regarding deliveries by untrained loggers addresses the comment.	Refer to Section 6 – Guidance part 10
What about wood from tribal lands; sovereign nations may not recognize outside organizations training or requirements. What's right for the resource and company is to work with those entities to harvest wood in conformance with the rest of the standard and sustainable forestry.	Provide and exception for wood from tribal lands		2	Comment addresses scenario where wood is delivered from tribal lands by tribal loggers who have not completed SIC approved logger training. This scenario could be captured under the de minimis language.	Refer to Section 6 – Guidance part 10
No reason to not expect the majority to meet this. Requiring this would make the Standard stronger and more auditable with a number. "Strive to" and "limit" are subjective and hard to audit.	Put this in the Standard and make it a "shall"		2	Task Group has reviewed the comment but does not support addressing deliveries by untrained loggers in normative language.	None

[redacted]	Remove the word "strive" from 17.2.2 and replace entire paragraph with proposed language	SFI program participants have had 20 years to obtain 100% compliance with the LT&E requirements of the program. The current language continues to allow an unknown volume of fiber to be delivered from untrained loggers when the word "strive" is included. The logging contractors who are performing and in compliance with the requirements of the SFI standards are at a competitive disadvantage with those who are not. The language in 17.2.2 also encourages SFI program participants to utilize the services of untrained loggers during times when sustainable harvesting operations should be required for the environmental sensitivity that is needed following a natural disaster. It is highly unlikely that a "new" logging business will evolve during these times of distress given the capital outlay that is required, and to flood markets with fiber from unsustainable operations being performed by untrained loggers will not only help to dismantle existing logging infrastructure, but could cause irreparable damage to the public image of the timber harvesting industry. The proposed language serves to clean up this potential problem recognizing the gap that could exist in the availability of training programs.	17.2.2 They should limit their deliveries from untrained loggers to no more than 5% of their raw material from logging professionals who have completed or are currently enrolled in training programs, with allowances for turnover in the logging workforce, availability, timing, and length of training programs, other wood suppliers (defined as a person or organization who infrequently supplies wood fiber on a small scale, such as farmers and small-scale land-clearing operators), and availability of trained logging professionals locally.	2	Task Group has reviewed the comment and believes that the revised guidance language regarding deliveries by untrained loggers addresses the comment.	Refer to Section 6 – Guidance part 10
[redacted]	Although the 5% de minimus is presented as an aspirational target there is concern in Western Canada that this could eventually transition to a hard target due to the poor fit of the SFI standard when it comes to logger training in Western Canada. The current standard and definition of qualified logging professioanl will need a major overhaul to adequally address the Canadian context if the de minimus target is ever adopted into the standard. The stanrdard would also need to be modified to better address other certifed sources, such as CSA; which is currently done through an interpretation in the WCSIC Training Policy.	No change is proposed	No change is proposed	2	Task Group has reviewed the comment but have proposed revisions to the guidance for deliveries by untrained loggers.	Refer to Section 6 – Guidance part 10

[redacted]	The wording to "strive to limit their deliveries from untrained loggers to no more than 5%" needs to be changed to be more accepting of small family woodlots. The wording that says, "a person or organization who infrequently supplies wood fiber on a small scale, such as farmers and small-scale land clearing operators" does not accurately represent the landowners in many areas and needs to be changed.	The wording to "strive to limit their deliveries from untrained loggers to no more than 5%" needs to be changed. This requirement does not take into account the numerous small non-industrial private landowners that harvest timber on their own ground and bring it to the mill. In some areas, these deliveries make up a significant portion of the wood supplied to mills. In most cases, these landowners have been logging their own ground for 30+ years to provide additional income, while maintaining forest health on their property. These landowners don't have the need to become "formally" trained in logging, but they are very proficient in the rules and regulations, BMP's, and they are very interested in maintaining forest productivity and health on their own ground. Many of these landowners are certified tree-farmers, but they are not certified loggers. The wording that says, "a person or organization who infrequently supplies wood fiber on a small scale, such as farmers and small-scale land clearing operators" does not accurately represent the landowners in many areas. The majority of small landowners in many areas provide wood to mills every year (not infrequently) and when you add up all of the logs from these small landowners they can comprise up to 10% of the wood supplied to mills in some areas. Requiring mills to turn away logs from small landowners that have been bringing wood fiber to those mills for 30+ years because they aren't "trained" is out of touch with reality.	"Program is defined in the SFI 2015-2019 Standard as an organized system, process or set of activities to achieve an objective or performance measure. Indicators 11.1.1 and 17.1.5 requires Certified program participants to develop a program for the purchase of their raw material from logging professionals who have completed training programs. They should strive to limit their deliveries from untrained loggers to no more than 10% with allowances for turnover in the logging workforce, availability, timing and length of training programs, other wood suppliers (defined as a person or organization who infrequently supplies wood fiber on a small scale, such as farmers and small-scale land-clearing operators), and availability of trained logging professionals locally. This cap on deliveries by untrained loggers also needs to recognize that catastrophic events (severe storms, wildlife, beetle epidemics) can result in large-scale salvage efforts over comparatively short periods of time which can result in increased deliveries by untrained loggers. This cap does not include deliveries by small landowners who are logging on their own property.	2	Task Group has reviewed the comment and believes that deliveries by small, non-industrial or family forestland owners would be covered under the category of *other wood suppliers* which is a SFI defined term.	Refer to Section 13 – Definitions.

	"limit deliveries from untrained loggers to no more than 5%". The reference to certified logging professionals is vague and my understanding is that maybe one state truly meets the criteria-not sure of relevance when not available nor likely to become available.	As a non-fee landowning company certified for fiber sourcing, we see this criteria very discriminating as compared to companies with large acreages of controlled wood. Our raw material deliveries are unpredictable in timing and source but, survival depends upon being opportunistic. Many of our deliveries come from landowners who conduct their own logging operations during the winter before calving. Strictly subject to log availability-their is no abundance of logs in our location. Seems like a lot of language and constraint for requiring certified logging professionals which does not exist.	Suggest: "strive to achieve a long term goal of 90%" Certified Program Participants shall have written agreements encouraging logger training and being recognized as qualified logging professionals.	2	Task Group has reviewed the comment and believes that the revised guidance language regarding deliveries by untrained loggers addresses the comment.	Refer to Section 6 – Guidance part 10
	In objective 17.2.2 would like to have this wording changed "continuing education component with coursework"	This wording suggests that the training would have to be in a classroom environment. The wording is too restrictive. Training can be done onsite during a prework as well as annually at a contractor training seminar.	The SIC-approved wood producer's training programs shall have a continuing education component with "training content" that supports the current logger training programs,	3	Comment addressed in responses for Section 11 and Section 3 Objective 6.	Refer to SFI 2015-2019 Forest Management Indicator 11.2.2 and SFI 2015-2019 Fiber Sourcing Standard Indicator 6.2.2.
	Section 6; 6.1 Disagree with the Guidance Document language in Section 6.1 which states "Certified logging professional programs are in their infancy". Section 6; 6.2 They should strive to limit their deliveries from untrained loggers to no more than 5% with allowances for turnover in the logging workforce, availability, timing and length of training programs, other wood suppliers (defined as a person or organization who infrequently supplies wood fiber on a small scale, such as farmers and small-scale land-clearing operators), and availability of trained logging professionals locally.	Section 6; 6.1 Most of these programs, including Maine, Michigan, Minnesota and Wisconsin, have mature programs that have gone through several standard revisions of their own and have existed for ten or more years. The widespread use and development of these programs has been hampered by the lack of recognition & added value within the SFI Standard. While the SFI Standard encourages and promotes the use of certified logging professionals, it must do more. Section 6; 6.2 Strive is a subjective term which weakens the standard. Using a specific percent provides clarity and credibility and 95% is a reasonable expectation.	Section 6; 6.1 Delete "Certified logging professional programs are in their infancy in terms of their development and are not in widespread use." Section 6; 6.2 Strike the words "strive to" and replace with "shall" limit their deliveries...	2	Edit has been made to remove "infancy". Regarding deliveries by untrained loggers the task group believes the revised guidance addresses the comment.	Refer to Section 6 – Guidance part 10

[redacted]	In most areas, access to trained loggers sufficient to meet a 95% trained logger threshold is not possible. Although program participants encourage suppliers to become trained, it is an on-going process that often does not yield results quickly. In areas where there are robust non-SFI Program Participant markets or a large volume of commercial development, there is often more short term access to raw material from untrained sources (housing, road construction, commercial development). In addition, there are also areas such as surface mines and utility right-of-way clearing that generate fiber. These sources, we believe should be put to a higher use (in wood products) than burned or put in a landfill. A 10% de minimus delivery volume from untrained sources, rather than 5%, would increase the likelihood that all available wood can be utilized, and not force participants to refuse wood that is available to them. Program participants should strive to limit deliveries from untrained sources to 10% or show continued improvement by gradually decreasing the amount of material accepted from untrained sources when the 10% allowance is not achievable.	To ensure that the standard is interpreted as we believe it is intended: to encourage continuous improvement and wider uptake of sustainable forestry practices.	Program is defined in the SFI 2010-2014 Standard as an organized system, process or set of activities to achieve an objective or performance measure. Indicators 11.1.1 and 17.1.5 require Certified program participants to develop a program for the purchase of their raw material from logging professions who have completed training programs. They should strive to limit their deliveries from untrained loggers to no more than 10% or show continued improvement by gradually decreasing the amount of material accepted from untrained sources when the 10% allowance is not achievable, with allowances for turnover in the logging workforce, availability, timing and length of training programs, other wood suppliers (defined as a person or organization who infrequently supplies wood fiber on a small scale, such as farmers and small-scale land-clearing operators), and availability of trained logging professionals locally. This cap on deliveries by untrained loggers also needs to recognize that catastrophic events (severe storms, wildlife damage, beetle epidemics) can result in large-scale salvage efforts over comparatively short periods of time, which can result in increased deliveries by untrained loggers.	2	Task Group has reviewed the comment and believes that the revised guidance language regarding deliveries by untrained loggers addresses the comment.	Refer to Section 6 – Guidance part 10
[redacted]	There is much concern regarding the "5% de minimis limit". There is an inherent unfairness associated with this specified target. It is one thing if a Participant has its own land base or a high percentage of controlled stumpage vs. a Participant who depends on a large percentage of delivered open market logs. it also makes quite a difference if a Participant is located in a market area that has abundant fiber supply allowing them to be more selective vs. a Paricipant in an area of constrained supply. This requirement tends to infer that wood from untrained suppliers is somehow bad. Although it is more convenient to purchase from "trained" sources, there is nothiing wrong with "untrained" if the Participant is following all requirements of the Standard (such as outreach material, verifiable monitoring, ect.). We see many expamples of outstanding stewardship work by untrained suppliers.	Either leave the way it currently is in the Standard, increase the de minimis amount or add language that emphasizes continued improvement for the long term	Participants should strive for continuous improvement over time to achieve a long term goal of 95% or more of their fiber supply from logging professionals who have completed training programs.	2	Task Group has reviewed the comment and believes that the revised guidance language regarding deliveries by untrained loggers addresses the comment.	Refer to Section 6 – Guidance part 10

[redacted]	17.1.5 should not be written such that the expectation is that all suppliers are Trained. It is OK to strive to have wood delivered by Trained Loggers but the reality is that this varies greatly by region and economic conditions. The guidance document defines a metric of 95% which is inappropriate. Many regions do not have that percentage of suppliers trained and creating an audit metric of 85% trained is unacceptable. All references to a numerical metric should be struck from the guidance document.		Strike out remainder that begins with "to no more than 5%..... Second sentence should be "They should strive to limit their deliveries from untrained loggers."	2	Task Group has reviewed the comment and believes that the revised guidance language regarding deliveries by untrained loggers addresses the comment.	Refer to Section 6 – Guidance part 10
[redacted]	To accommodate organizations sourcing wood fiber from tribal lands, there needs to be some recognition of the fact that imposing a requirement for trained loggers presents several issues.	To accommodate organizations sourcing wood fiber from tribal lands, there needs to be some recognition of the fact that imposing a requirement for trained loggers presents several issues.	As a result the sentence in the last paragraph in 6.2 on page 121 should be modified as follows 'They should strive to limit their deliveries from untrained loggers to no more than 5% with allowances for turnover in the logging workforce, availability, timing and length of training programs, other wood suppliers (defined as loggers who are tribal members supplying wood fiber from tribal lands, or a person or organization who infrequently supplies wood fiber on a small scale, such as farmers and small-scale land-clearing operators), and availability of trained logging professionals locally	2	Comment addresses scenario where wood is delivered from tribal lands by tribal loggers who have not completed SIC approved logger training. This scenario could be captured under the de minimis language. Task Group has reviewed the comment and believes that the revised guidance language regarding deliveries by untrained loggers addresses the comment.	Refer to Section 6 – Guidance part 10
[redacted]	This is a good change and the 5% allowance is reasonable. SFI has documented that approximately 94-96% of raw materials used by certified participants' facilities is delivered by trained loggers. Some loggers believe the amount delivered by untrained loggers is too large and that SFI should have a 100% policy	It is not practical to have a 100% policy without an allowance for all the factors recognized in the guidance above.	I know there is still some disagreement on how to handle this. I think the current language and approach is very good. Another option would be to continue with this approach and then ask the External Review Panel to take on this issue as a special project in 2014-2015 to study it to see if this is (or is not) an issue of significant scope/scale to warrant changes in the future to change the allowance of no more than 5%.	2	Task Group has reviewed the comment and believes that the revised guidance language regarding deliveries by untrained loggers addresses the comment.	Refer to Section 6 – Guidance part 10

[redacted]	6.1: Disagree with the Guidance Document language in Section 6.1 which states "Certified logging professional programs are in their infancy". 6.2: Program participants should strive to limit their deliveries from untrained loggers to no more than 5% with allowances for turnover in the logging workforce, availability, timing and length of training programs, other wood suppliers (defined as a person or organization who infrequently supplies wood fiber on a small scale, such as farmers and small-scale land-clearing operators), and availability of trained logging professionals locally.	Most of these programs, including Maine, Michigan, Minnesota and Wisconsin, have mature programs that have gone through several standard revisions of their own and have existed for ten or more years. The widespread use and development of these programs has been hampered by the lack of recognition & added value within the SFI Standard. While the SFI Standard encourages and promotes the use of certified logging professionals, it must do more. 6.2: Strive is a subjective term which weakens the standard. Using a specific percent provides clarity and credibility and 95% is a reasonable expectation.	6.1: Delete "Certified logging professional programs are in their infancy in terms of their development and are not in widespread use." 6.2: Strike the words "strive to" and replace with "shall" limit their deliveries...	2	Edit has been made to remove "infancy". Regarding deliveries by untrained loggers the task group believes the revised guidance addresses the comment.	Refer to Section 6 – Guidance part 10
[redacted]		5% is an unrealistic number. There should not be a firm # just a commitment to improve.	They should strive to limit their deliveries from untrained loggers with allowances for turnover.....	2	Task Group has reviewed the comment and believes that the revised guidance language regarding deliveries by untrained loggers addresses the comment.	Refer to Section 6 – Guidance part 10
[redacted]	I agree that we want to have small volumes of wood delivered by untrained loggers. However, I object to stating the 5% requirement in the standard.	My concern is that once you put a hard number in there, an auditor will ask me to prove how I know I have met or exceeded 5% of deliveries. The KapStone Longview mill does not buy stumpage. I do survey our suppliers for the annual SFI report and take their word on percent wood delivered by trained loggers. Am I going to have to ask my suppliers to prove it? Are they going to need to give me a piece of paper verifying trained vs. untrained for every logging job they procure logs from (either saw logs for a sawmill or pulp logs for a chip yard)?	Revised wording for 2 sentences in the paragraph above: They should strive to limit their deliveries from untrained loggers with allowances for turnover in the logging workforce, availability, timing and length of training programs, other wood suppliers (defined as a person or organization who infrequently supplies wood fiber on a small scale, such as farmers and small-scale land-clearing operators), and availability of trained logging professionals locally. Deliveries by untrained loggers also needs to recognize that catastrophic events (severe storms, wildlife, beetle epidemics) can result in large-scale salvage efforts over comparatively short periods of time which can result in increased deliveries by untrained loggers.	2	Task Group has reviewed the comment and believes that the revised guidance language regarding deliveries by untrained loggers addresses the comment.	Refer to Section 6 – Guidance part 10
[redacted]	5% is too low	95% trained loggers is not reasonable or attainable in most cases. 80% is a reasonable goal to strive for.	They should strive to limit their deliveries from untrained loggers to no more than 20%	2	Task Group has reviewed the comment and believes that the revised guidance language regarding deliveries by untrained loggers addresses the comment.	Refer to Section 6 – Guidance part 10

	6.2 Use of Trained Loggers and the definition of Program, proposes that program participants strive to limit deliveries by untrained loggers to no more than 5%. This terminology (strive) leaves a great deal open to the interpretation and discretion of the auditor. Placing a specific percentage does not consider the many differences and challenges of many SFI Program Participants. It also does not consider the large component of Non-Industrial Private Forest Owners in Idaho who harvest their own woodlands. Most of these woodland owners, for one reason or other, do not want or find it feasible to maintain Pro-Logger Certification. Most may only remove minimal amounts of timber on each entry and the small volumes do not warrant the time and mobilization costs of a professional logger. The large number of these landowners can result in a significant percentage of volume for many SFI participants in Idaho. A number of these landowner's woodlands are active members of the Idaho Tree Farm Program which has mutual recognition from SFI.			2	Task Group has reviewed the comment and believes that the revised guidance language regarding deliveries by untrained loggers addresses the comment.	Refer to Section 6 – Guidance part 10
	The Idaho Tree Farm Program has always had strong participation and has recently seen enormous growth. This growth is due to the hard work of a number of dedicated volunteers and financial assistance from the Idaho SFI State Implementation Committee. Many Tree Farm participants harvest and market their timber but are not are not Pro- Logger Certified. It does seem counterintuitive to have to refuse SFI recognized deliveries from Idaho Tree Farm properties because a Program Participant is concern about a 5% threshold. In both these situations the Idaho SFI Implementation Committee would like to see the proposed standard changed, or the implementation guidance clear to provide: 1) Trained loggers are required to oversee active logging jobs, but fully trained personnel are not required to be to be on-site whenever a logging site is active. 2) Wood deliveries from loggers which are not accredited are allowed and may exceed the numeric tolerances, only in situations where no practicable alternatives exist or are situations that are beyond the reasonable control of the purchaser."	we disagree with the Guidance Document language in Section 6.1 which states "Certified logging professional programs are in their infancy". Most of these programs, including Maine, Michigan, Minnesota and Wisconsin, have mature programs that have gone through several standard revisions of their own and have existed for ten or more years. The widespread use and development of these programs has been hampered by the lack of recognition & added value within the SFI Standard. While the SFI Standard encourages and promotes the use of certified logging professionals, it must do more.		1	Edit has been made in guidance.	Refer to Section 6 – Guidance part 10

7. ILO CORE CONVENTIONS

Indicator 15.2 was added to address differences in U.S. labor law and the ILO core conventions. Additional guidance is provided here for application of 15.2 for independent contractors and for *Certified Program Participants*.

Application of 15.2 for independent contractors operating on lands owned or controlled by *Certified Program Participants*:
- *Certification bodies* at the time of the audit will collect and review information the *Program Participant* has received from outside stakeholders with regards to concerns or conformance pertaining to independent contractor actions related to ILO Core conventions 87, 98 and 111.
- Any information collected by the *certification bodies* during normal auditing times will be promptly submitted without contractor identifying information to the *Program Participant*, *SFI Inc.* and the SFI ILO Task Force. Information received will be reviewed every 6 months by the *SFI* ILO Task Force which will develop recommendations to the *SFI Inc.* Board of Directors for resolution of any significant problems identified.
- Indicator 15.2 shall only apply to the core conventions not fully covered by existing U.S. or Canadian law.
    - o Right to Organise (No. 87)
    - o Right to Organise and Collective Bargaining (No. 98)
    - o Discrimination (111).

- In addition, any ILO related issue that is being addressed through a formal grievance process or before any of the agencies established by the U.S. National Labor Relations Act (NLRA), the appropriate Provincial Labour Code or Act, or the courts until those processes are completed, and will not be subject to review, consideration or recommendations by the *SFI* ILO Task Force nor by the *SFI Inc.* Board of Directors.

Application of 15.2 for *Certified Program Participants* with respect to their employees operating on lands owned or controlled by *Program Participants*:
- *Certification bodies* at the time of the audit will collect and review information the *Certified Program Participant* has received from outside stakeholders with regards to concerns or conformance pertaining to their employee relations with regards to ILO Core conventions 87, 98 and 111.
- Stakeholders may raise issues regarding conformance to indicator 15.2 through the inconsistent practices procedures outlined in the *SFI* Public Inquires and Official Complaints (Section 11) requirements, item 3.
- All information collected though the inconsistent practices process will be reviewed every 6 months by the *SFI* ILO Task Force which will develop recommendations to the *SFI Inc.* Board of Directors for resolution of any significant problems identified. - Indicator 15.2 shall only apply to the core conventions not fully covered by existing U.S. or Canadian law.
    - o Right to Organise (No. 87)
    - o Right to Organise and Collective Bargaining (No. 98)
    - o Discrimination (111).

- In addition, any ILO related issue that is being addressed through a formal grievance process or before any of the agencies established by the U.S. National Labor Relations Act (NLRA), the appropriate Provincial Labour Code or Act, or the courts until those processes are completed will not be subject to review, consideration or recommendations by the *SFI* ILO Task Force nor by the *SFI Inc.* Board of Directors.

Public forest landowners in states (Alabama, North Carolina and Virginia) that currently have laws prohibiting bargaining with their public employees shall be "grandfathered in" as meeting the requirements in indicator 15.2 but must still participate in the information gathering process with their *certification bodies* (for independent contractors) and the inconsistent practices process in item 8.4 of the SFI Public Inquires and Official Complaints (Section 11) requirements to aid in resolution of any issues that may be identified.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
This needs to be extended to the entire CoC	SFI has managed to lead the market in terms of labor standards for the forest management section of its standards. Despite initial concerns and fears during the past several years operating under these standards no problems have arisen. It seems logical to extend these standards to the entire CoC giving SFI a marketing advantage vis-a vis other certification systems operating in North America,	Make changes in current language to make applicable to C of C.	2	The Task Group has reviewed the comment and is of the opinion that it the SFI CoC addresses this issue via its assessment for sourcing from areas without effective social laws.	Refer to SFI 2015-2019 Chain of Custody Standard
Federal and State laws should be adhered to over and above ILO laws. ie right to work laws presently enforced and future right to work laws. State law should take precedence over international law.			3	General comment. SFI currently meets the ILO requirements related to forest management operations as demonstrated by the 2014 PEFC re- endorsement of the SFI Forest Management requirements. Program participants can meet state and federal laws and meet the intent of the ILO conventions.	None

8. SFI IMPLEMENTATION COMMITTEES

SFI Certified Program Participants established state SFI *Implementation Committees* in 1995 and the first provincial *SFI Implementation Committee* in 2001. *SFI Implementation Committees* provide a strong foundation for the SFI *program* and make important contributions in assuring *SFI Standard* conformance and *SFI* program recognition. The state, provincial and regional *SFI Implementation Committees* are semi-autonomous committees reflecting significant geographic and organizational diversity. This flexible, grassroots infrastructure is a fundamental strength of the *SFI* program and its goal to promote responsible *forestry* across all forest ownerships.

The definition of *SFI Implementation Committee* (SIC) in the *SFI 2015-2019 Standard* is: A state, provincial, or regional committee organized by *SFI Certified Program Participants* to facilitate or manage the programs and alliances that support the growth of the *SFI program*, including sustainable forest management."

In 2009, *SFI Inc.* developed an ad-hoc committee to review the *SFI Implementation Committee* governance document for relevance to the current *SFI program*, and to ensure consistency with the *SFI 2015-2019 Standard*. This committee reinforced the need for this governance document to ensure consistency with the current *SFI Standard*. The *SFI Implementation Committee* governance document will be updated in conjunction with future *SFI Standard* revisions, and may also be reviewed between scheduled revisions if there are significant *SFI program* changes.

Some key elements from the governance document and how they relate to the *SFI 2015-2019 Standard* are included here.

Vision Statement
SFI Implementation Committees (SICs) are an integral part of the *SFI* program and play a vital role in promoting training and landowner outreach, maintaining integrity of the *SFI* program and supporting and promoting responsible *forestry* and the *SFI* program at local levels.

Mission Statement
The Memorandum of Understanding (MOU) defines the *SIC* Mission, ensuring *SIC* goals and priorities are based on recommendations from the SIC Governance Review Ad-hoc Committee. The MOU clarifies both the SIC mission and supports obligations for *SFI Certified Program Participants* as follows:

I. Overall *SIC* Mission - Effectively facilitate or manage at a state, provincial or regional level the *programs* and alliances which support the growth of sustainable forest management through the *SFI* program.

II. Core SIC Mission - Priorities for all *SIC*s:
A. Training - Education - Establish criteria and identify delivery mechanisms for logging professional, forest resource professional and wood producer training, and defining what it means to be "SFI trained" (SFI 2015-2019 Standard Indicator 16.2.1.). Establish criteria for recognition of *certified logging professional programs*, where they exist (SFI 2015-2019 Standard Indicator 17.2.2.).
B. Inconsistent Practices - Establish protocols for addressing, investigating, and responding to *SFI Standard* non-conformity allegations and inconsistent practices, and allegations regarding non-*Certified Program Participant* forest management practices (SFI 2010-2014 Standard Performance Measure 18.3).
C. Landowner Outreach - Focus landowner outreach efforts on education and technical assistance (SFI 2015-2019 Standard Indicators 18.1.1. – 18.1.3.).

D. Informational Resources -- Focus informational resource efforts on increasing *SFI* program recognition, awareness and support with groups, such as local opinion leaders and *forestry* resource professionals (SFI 2015-2019 Standard Performance Measure 18.2.).
E. Annual Reporting -- Submit the SIC Annual Progress Report to *SFI Inc.*
F. *SFI* Program Integrity (SFI 2015-2019 Standard Indicators 18.3.1. and 18.3.2.) - Protect the integrity of the *SFI* program by:
a) ensuring proper *SIC* service mark usage;
b) alerting *SFI Inc.* when improper communications or misleading claims are observed;
c) avoiding the appearance of participation or compliance by non-*SFI Certified Program Participants*; and
d) avoiding appearance of third-party certification by non-certified *SFI Certified Program Participants*.

III. Secondary *SIC* Mission - Below are priorities which may be determined by each *SIC*; however, individual participants may choose not to participate or support these objectives.
A. Training & Education- Provide delivery mechanisms for logging professional, and forest resource professional, and wood producer training to address *SFI* program needs not adequately provided by other programs.
B. Market Outreach - Sponsor active market outreach efforts in local communities that may include paid advertising.
C. Recruitment - Encourage large landowners and all forest products facilities to enroll as *SFI Certified Program Participants*; encourage family forest owners to participate in American Tree Farm System or similar programs recognized by the *SFI* program, as appropriate.
D. Forest Management Statistics - Encourage government agencies to provide accessible timely, accurate harvest and regeneration statistics, in support of a *Certified Program Participant's sustainable forestry programs* (SFI 2015-2019 Standard Performance Measure 16.2.).
E. Research - Promote *forestry* research, science, and technology, upon which sustainable forest management decisions are based (SFI 2015-2019 Standard Objective 16.)

SIC Organization

*SIC*s are semi-autonomous committees reflecting significant geographic and organizational diversity. This flexible, grassroots infrastructure is a fundamental strength of the *SFI* program and our goal to promote *sustainable forestry* across all ownerships. The following is intended to clarify support expectations and provide guidance to ensure consistency, while still maintaining *SIC* flexibility.

	Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
	SIC's need to reflect the same balance and depth of organizations as does SFI.	SFI's Board of Directors is a strength given its balanced and wide spread representational interests. SIC's should strive to obtain a similar balance.	The state, provincial and regional SFI Implementation Committees are semi-autonomous committees reflecting significant geographic, organizational, community, gender, and labor group diversity.	2	Comment is not within the scope of the Task Groups to review and comment upon. This is the role of the SFI Implementation Committees themselves. This comment will be brought forward to the SICs at the 2014 SFI Annual Conference for consideration.	None

9. TRANSITION TO THE SFI 2015-2019 STANDARD

Changes adopted by the *SFI Inc.* Board of Directors to the *SFI Standard* must be incorporated into a *Certified Program Participant's* policies, plans, and management activities within one year of adoption and publication. Similarly, changes to certification procedures and qualifications for *certification bodies* must be accomplished within one year of adoption and publication. It is the *Certified Program Participant's* responsibility to work with the certification body to establish a surveillance audit schedule that meets the requirements outlined in the Section 9 SFI 2015-2019 Audit Procedures and auditor Qualifications and Accreditation. Additional guidance regarding the transition is included below:

• The *SFI 2015-2019* Standard replaces the *SFI 2010-2014 Standard*, which is the current standard implemented by organizations within their forest operations in United States and Canada.
• SFI Inc. developed the SFI 2015-2019 Standard, but does not conduct auditing and certification. All certification, recertification and surveillance audits to the SFI 2015-2019 Standard shall be conducted by certification bodies accredited by the ANSI-ASQ National Accreditation Board (ANAB) or the Standards Council of Canada (SCC) to conduct SFI certification.
• Accredited certification bodies are required to maintain audit processes consistent with the requirements of International Organization for Standardization (ISO) 17021:2011 conformity assessment – requirements for bodies providing audit and certification of management systems; and conduct audits in accordance with the principles of auditing contained in the ISO 19011:2011 Guidelines for Auditing Management Systems.
• ANAB- and SCC-accredited certification to the SFI 2015-2019 Standard shall not be granted until it is published as a standard. • SFI Certified Program Participants have one year from the time the SFI 2015-2019 Standard takes effect on January 1, 2015 to implement all new and revised requirements, and Certified Program Participants must demonstrate conformance to the new requirements at their first surveillance audit following the implementation period. Earlier adoption is encouraged.
• Initial certification audits in 2015 must be conducted against the SFI 2015-2019 Standard.
• After March 31, 2015 all re-certifications must be conducted against the SFI 2015-2019 Standard. For re-certifications against the SFI 2015-2019 Standard nonconformities against changes made in the revised SFI 2015-2019 Standard shall be reported but will not adversely affect re-certification until after December 31, 2015.
• Surveillance audits through December 31, 2015 may be conducted against either the SFI2010-2014 Standard or SFI 2015-2019 Standard at the Certified Program Participant's choice. For surveillance audits after March 31, 2015, nonconformities against changes made in the revised SFI 2015-2019 Standard shall be reported but will not adversely affect certification status until December 31, 2015; these audits shall also include an assessment of action plans to fully transition to the SFI 2015-2019 Standard by December 31, 2015.
• After December 31, 2015 all surveillance audits must be conducted against the SFI 2015-2019 Standard.

SECTION 7. SFI POLICIES

SFI PROGRAM LEGALITY REQUIREMENTS

Certified Program Participants must comply with federal, provincial, state and local laws that cover a broad range of issues, and protect the environment, workers and people who live in the communities where they operate. They include federal, state, provincial or local *forestry*-related environmental laws and regulations found in the United States and Canada such as The Clean Water Act, The Endangered Species Act, The Species at Risk Act, and state or provincial forest practice laws. The social laws of the United States and Canada cover civil rights, equal employment opportunities, anti-discrimination and anti-harassment measures, workers' compensation, measures to protect indigenous peoples' rights, workers' and communities' right to know, wages and working hours, and occupational health and safety. Antitrust, business competition and other laws in the United States and Canada outline business procedures that must be followed.

The *SFI* program does not try to duplicate the comprehensive *sustainable forestry* laws and processes already mandatory in the United States and Canada. Both countries have mature legal systems that consistently discourage and punish illegal behavior. Given the wide range of due process and compliance mechanisms that ensure conformance with applicable laws, the *SFI Standard* purposefully focuses on continual improvement of the practice of *sustainable forestry*, *forest productivity*, environmental performance processes and community outreach that complements the existing legal framework.

When an *SFI Certified Program Participant* procures wood offshore (beyond North America), the *SFI 2015-2019 Standard* stipulates the need to avoid controversial sources of supply, *including illegal* logging and *fiber sourced* from *countries without effective social laws*.

SFI Principle 9. Legal Compliance. To comply with applicable federal, provincial, state, and local *forestry* and related environmental laws, statutes, and regulations.

SFI Objective 13 Avoidance of Controversial Sources including *Illegal Logging*. To broaden the practice of sustainable forestry by avoidance of *illegal logging*.

Performance Measure 13.1. *Certified* P*rogram Participants* shall ensure that their *fiber sourcing programs* support the principles of *sustainable forestry*, including efforts to reduce the risk of *illegal logging*
Indicators: 1. Process to assess the risk that the *Program Participant's fiber sourcing program* could acquire material from *illegal logging* such as consulting information from the World Resources Institute Risk Information Tool, the World Bank, or Transparency International.
2. Program to address any significant risk identified under 13.1.1.
3. Program with *direct suppliers* to promote the *principles* of *sustainable forestry*.
4. Documented information that includes knowledge about *direct suppliers'* application of the *principles* of *sustainable forestry*.

SFI Objective 14. Avoidance of *Controversial Sources* including *fiber sourced* from *areas without effective social laws*. To broaden the practice of *sustainable forestry* by avoiding *controversial sources*.

Performance Measure 14.1. *Certified Program Participants* shall avoid *controversial sources* and encourage socially sound practices.
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.

2. Program to address any significant risk identified under 14.1.1.

SFI Objective 15. Legal and Regulatory Compliance. Compliance with applicable federal, provincial, state and local laws and regulations. Performance Measure 15.1.

Certified Program Participants shall take appropriate steps to avoid illegally harvested wood and to comply with applicable federal, provincial, state and local *forestry* and related social and environmental laws and regulations.
Indicators:
1. Access to relevant laws and regulations in appropriate locations.
2. System to achieve compliance with applicable federal, provincial, state or local laws and regulations.
3. Demonstration of commitment to legal compliance through *available regulatory action information*.
4. Process to assess the risk that the *Certified Program participants* fiber sourcing program could acquire material from illegal logging by considering some of the following:
  a. communications with suppliers
  b. independent research
  c. contract documentation
  d. maintain records
5. Program to address any significant risk identified under 15.1.4.
Performance Measure 15.2. *Certified Program Participants* shall take appropriate steps to comply with all applicable social laws at the federal, provincial, state and local levels in the country in which the *Certified Program Participant* operates.
Indicators:
1. Written policy 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. *Forestry enterprises* will respect the rights of workers and labor representatives in a manner that encompasses the intent of the ILO core conventions.

SFI definition of controversial sources:

a) Forest activities which are not in compliance with applicable state, provincial or federal laws, particularly as they may relate to:
- legally required protection of threatened and endangered species,
- requirements of CITES (The Convention on International Trade in Endangered Species of Wild Fauna and Flora)
- legally required management of areas with designated high environmental and cultural values,
- labor regulations relating to forest workers,
- indigenous peoples' property, tenure and use rights

b) fiber sourced from *illegal logging*.
c) fiber sourced from areas *without effective social laws*

Note: *Conversion sources* cannot be included when calculating *certified forest content*

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 European Union Timber Regulation (EUTR), or other relevant state, provincial, or federal legislation. The Lacey Act

1 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 Indian tribe, or any foreign law that protects plants. The EUTR 2 prohibits illegally harvested timber or products derived from such timber to be brought into the EU, and creates obligations for operators who place timber and timber products on the EU market. In addition, see Section 7 in the SFI requirements document, SFI Legality Requirements and Policies for Avoidance of Illegal Logging, for SFI Inc's Policy on Illegal Logging. 1 The Food, Conservation, and Energy Act of 2008 (Pub.L. 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).
2 Regulation EU No 995/2010 of the European Parliament and of the Council of 20 October 2010.

fiber sourced from areas without effective social laws: The United States and Canada have a strong legal framework. Fiber from countries without effective laws addressing the following will need a risk assessment:
1. workers'; health and safety;
2. fair labor practices;
3. indigenous peoples' rights;
4. anti-discrimination and anti-harassment measures;
5. prevailing wages; and
6. workers' right to organize.

SFI POLICY ON ILLEGAL LOGGING (As Approved by the SFI Board of Directors September 23, 2008.)

The *SFI* program has strong existing measures in the *SFI 2015-2019 Standard*, SFI Responsible Fiber Sourcing Standard and the SFI Chain-of-Custody Standard to avoid illegal sources of supply. This appendix covers the issue as to whether an organization can certify one operation to SFI's *Certified Sourcing* label Standard

(Section 4) or SFI's Chain-of-Custody Standard (Section 3) in the SFI requirements document,, while another operation controlled by the company is engaged in *illegal logging*.This is an evolving issue and as international laws, regulations, agreements, treaties and definitions of *illegal logging* change, SFI Inc. will review and update the language as necessary.

a. *SFI Inc.* will not license any person or entity to use SFI's trademarks or labels, and SFI may revoke any licence previously granted, if **the proposed licensee or an Affiliate of the licensee has been found to have engaged in illegal logging by a government authority in the jurisdiction where the logging occurred** (This enables SFI to take action that is based on a government finding (conviction, court decision, regulatory decision, fine etc.) of Illegal Logging. SFI would not make any factual determinations of illegal logging; they would be made by the government. No audit of overseas operations is required unless and until such a finding is made.), unless the evidence available to SFI supports a conclusion that, in the business judgment of the *SFI Inc.* Board, any incidents of illegal logging by the entity are followed by prompt corrective action and do not show a pattern of illegal logging.

b. SFI Inc. will not license any person or entity to use SFI's trademarks or labels, and SFI may revoke any licence previously granted, if **the evidence available to SFI supports a conclusion that, in the business judgment of the SFI Inc. Board, the proposed licensee or an Affiliate of the licensee has engaged in a pattern of *Illegal Logging*** (This enables SFI to take action against a company that is known to engage in a pattern of Illegal Logging, but that has NOT been subject to government enforcement actions (perhaps because the local government is corrupt or ineffective). The SFI Board would need to make the factual determinations based on the best evidence available to it. No audit of overseas operations is required unless and until such a finding is made.).

c. Any person or entity whose application for a SFI licence has been denied or whose license has been revoked pursuant to this section may reapply for a licence upon a showing that any past *illegal logging* has been stopped, that appropriate actions have been taken to prevent it from recurring, and that the proposed licensee and its Affiliates do not knowingly engage in *illegal logging*. Such showing shall be supported by a third party audit conducted by an *SFI certification body* accredited to conduct *2015-2019 SFI Standard* certifications and shall include local expertise as part of the audit team (The audit shall cover all operations in all jurisdictions where the illegal logging occurred.)

d. As used in this section,
- "*Illegal Logging*"means logging on land where the entity conducting the logging has no legal right to harvest.
- "Affiliate" means any person or entity that directly or indirectly controls, is controlled by, or is under common control with the proposed licensee.
- "Control" means owning a majority of the stock, appointing a majority of the directors, or otherwise having the practical or legal power to direct the operations of a person or entity (This definition does not cover most environmental law violations. It is intended to be limited to timber theft.)

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
Only complying with national law when national fails to obtain internationally recognized standards, conventions, and guidelines will leave SFI open to attacks from numerous civil society organizations as well as possible legal and trade issues in other countries.	Using specific ILO procedures provides certainty and an internationally recognized process and protocols removing ambiguity from the SFI standard	Performance Measure 14.1. Certified Program Participants shall avoid controversial sources and encourage socially sound practices. 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. compliance with ILO core labor standards; c. indigenous peoples rights; d. anti-discrimination and anti-harassment measures; e. prevailing wages providing family wage level employment; and f. workers' right to organize and bargain to obtain collective bargaining agreements Performance Measure 15.2. Certified Program Participants shall take appropriate steps to comply with ILO core labor standards, and all applicable social laws at the federal, provincial, state and local levels in the country in which the Certified Program Participant operates. Indicators: 1. Written policy 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 bargain collective agreements, and occupational health and safety. 2. Forestry enterprises will respect the rights of workers and labor representatives in a manner that complies with the intent of the ILO core conventions as determined by the ILO Committee of Experts and Committee on Freedom of Association.	3	SFI currently meets the ILO requirements related to forest management operations as demonstrated by the 2014 PEFC re-endorsement of the SFI Forest Management requirements.	None
Consider explicitly listing countries considered to be in compliance with effective social laws.			2	The Task Group has reviewed the comment but is of the opinion that each Certified Program Participant needs to evaluate its own sources of supply to determine its specific risk of sourcing from countries / regions without effective social laws.	None

[redacted]	Suggest including language that distinguishes "Genetically Modified" from "Genetically Superior".	In BC there is a requirement to utilize Class A seed where ever available. Class A seed is derived from genetically superior parent stock based on research indicating better-than-average yield of fibre volume over the rotation, but these sources are not getetically modified or engineered; they are just naturally better.		3	Comment is confusing the difference between Mendelian genetics (selective breeding) and genetic engineering / forest tree biotechnology. Task Group believes that inclusion of a reference to genetically superior materials in the Forest Tree Biotechnology Policy would induce confusion.	None
[redacted]	**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. *Proposed new language in the "policies" section of the SFI Standard would preclude fiber from GMO trees from being used in SFI labeled products per the requirements of the PEFC. However, conforming language is not yet contained in the label rules section of the Standard. More importantly, there is no proposed restriction on the use of GMO trees in SFI certified forests, meaning their risks have not actually been addressed.* Relevant SFI provisions (2010-2014): Indicator 15.1.2. *Proposed new language: Section 7.*	None provided. No specific change proposed.	None provided. No specific change proposed.	2	The comments do 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. Given the policy, there is no need for duplicative language in the labels section. The policy is clear that fiber from trees derived from forest tree biotechnology is not allowed. In addition, there are no trees currently approved for commercial forest deployment in the United States or Canada.	Refer to SFI 2015-2019 Forest Management Standard Ind. 10.1.2 and the SFI 2015-2019 Fiber Sourcing Standard Ind. 5.1.2 and the SFI Inc. Policy on Forest Biotechnology (Dec 2013).

[redacted]	We have suggested that the definition of illegal logging be removed and replaced with a definition of illegal timber (refer to comments in Definitions section). This change will require modifications to Section 7: SFI Program Legality Requirements to ensure consistency throughout the standard.	To ensure the standard language is consistent with other changes we are suggesting.	Certified Program Participants must comply with federal, provincial, state and local laws that cover a broad range of issues, and protect the environment, workers and people who live in the communities where they operate. They include federal, state, provincial or local forestry-related environmental laws and regulations found in the United States and Canada such as The Clean Water Act, The Endangered Species Act, The Species at Risk Act, and state or provincial forest practice laws. The social laws of the United States and Canada cover civil rights, equal employment opportunities, anti-discrimination and anti-harassment measures, workers' compensation, measures to protect indigenous peoples' rights, workers' and communities' right to know, wages and working hours, and occupational health and safety. Antitrust, business competition and other laws in the United States and Canada outline business procedures that must be followed. The SFI program does not try to duplicate the comprehensive sustainable forestry laws and processes already mandatory in the United States and Canada. Both countries have mature legal systems that consistently discourage and punish illegal behavior. Given the wide range of due process and compliance mechanisms that ensure conformance with applicable laws, the SFI Standard purposefully focuses on continual improvement of the practice of sustainable forestry, forest productivity, environmental performance processes and community outreach that complements the existing legal framework. When an SFI Certified Program Participant procures wood from offshore (beyond North America), the SFI 2015-2019 Standard stipulates the need to avoid controversial sources of supply, including illegal timber and fiber sourced from countries without effective social laws. SFI Principle 9. Legal Compliance. To comply with applicable federal, provincial, state, and local forestry and related environmental laws, statutes, and regulations. SFI Objective 13. Avoidance of Controversial Sources including illegal timber. To broaden the practice of sustainable forestry by avoidance of illegal timber. Performance Measure 13.1. Certified Program Participants shall ensure that their fiber sourcing programs support the principles of sustainable forestry, including efforts to reduce the risk of sourcing illegal timber. Indicators: 1. Process to assess the risk that the Certified Program Participant's fiber sourcing program could acquire illegal timber such as consulting information from the World Resources Institute Risk Information Tool, the World Bank, or Transparency International. 2. Program to address any significant risk identified under 13.1.1. 3. Program with direct suppliers to promote the principles of sustainable forestry. 4. Documented information that includes knowledge about direct suppliers' application of the principles of sustainable forestry. SFI Objective 14. Avoidance of Controversial Sources including Fiber Sourced from Areas without Effective Social Laws. To broaden the practice of sustainable forestry by avoiding controversial sources. Performance Measure 14.1. Certified Program Participants shall avoid controversial sources and encourage socially sound practices. Indicators: 1. Process to assess the risk that the Certified 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. 2. Program to address and significant risk identified under 14.1.1. SFI Objective 15. Legal and Regulatory Compliance. Compliance with applicable federal, provincial, state and local laws and regulations. Performance Measure 15.1. Certified Program Participants shall take appropriate steps to avoid illegal timber and to comply with the applicable federal, provincial, state and local forestry and related social and environmental laws and regulations. Indicators: 6. Access to relevant laws and regulation in appropriate locations. 7. System to achieve compliance with applicable federal provincial, state or local laws and regulations. 8. Demonstration of commitment to legal compliance through available regulatory action information. 9. Process to assess the risk that the Certified Program Participants fiber sourcing program could acquire illegal timber by considering some of the following: a. Communications with suppliers b. Independent research c. Contract documentation d. Maintain records 10. Program to address any significant risk identified under 15.1.4. Performance Measure 15.2. Certified Program Participants shall take appropriate steps to comply with all applicable social laws at the federal, provincial, state and local levels in the country in which the Certified Program Participant operates. Indicators: 3. Written policy 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. 4. Forestry enterprises will respect the rights of workers and labor representatives in a manner that encompasses the intent of the ILO core conventions. SFI definition of controversial sources: a) Forest activities which are not in compliance with applicable state, provincial or federal laws, particularly as they relate to: • Legally required protection of threatened and endangered species; • Requirements of CITES (The Convention on International Trade in Endangered Species of Wild Fauna and Flora); • Legally requirement management of areas with designated high environmental and cultural values; • Labor regulations relating to forest workers; and • Indigenous peoples' property, tenure and use rights. b) Illegal timber. c) Fiber sourced from areas without effective social laws. Illegal Timber: Timber that is logged, harvested or traded in violation of applicable statutes, regulations, binding administrative directives in force in the country of harvest at the time of harvest which are required by national due diligence schemes to demonstrate legal harvest. fiber sourced from areas without effective social laws: The United States and Canada have a strong legal framework. Fiber from countries without effective laws addressing the following will need a risk assessment: 1. Workers' health and safety; 2. Fair labor practices; 3. Indigenous peoples' rights; 4. Anti-discrimination and anti-harassment measures; 5. Prevailing wages; and 6. Workers' right to organize. SFI Policy on Illegal Timber The SFI program has strong existing measures in the SFI 2015-2019 Standard, SFI Certified Sourcing label Standard and the SFI Chain-of-Custody Standard to avoid illegal sources of supply. This appendix covers the issue as to whether an organization can certify one operation to SFI's Certified Sourcing label Standard (Section 4) or SFI's Chain-of-Custody Standard (Section 3) in the SFI requirements document, while another operation controlled by the company is engaged in the harvest and sale of illegal timber. This is an evolving issue and as international laws, regulations, agreements, treaties and definitions of illegal timber change, SFI Inc. will review and update the language as necessary. (a) SFI Inc. will not license any person or entity to use SFI's trademarks or labels, and SFI may revoke any license previously granted, if the proposed licensee or an Affiliate of the licensee has been found to have harvested and sold illegal timber by a government authority in the jurisdiction where the logging occurred, unless the evidence available to SFI supports a conclusion that, in the business judgment of SFI Inc. Board, any incidents of the harvest and sale of illegal timber by the entity are followed by prompt corrective action and do not show a pattern of harvest and sale of illegal timber. (b) SFI Inc. will not license any person or entity to use SFI's trademarks or labels, and SFI may revoke any license previously granted, if the evidence available to SFI supports a conclusion that, in the business judgment of SFI Inc. Board, the proposed licensee or an Affiliate of the licensee has engaged in a pattern of harvest and sale of illegal timber. (c) Any person or entity whose application for a SFI license has been denied or whose license has been revoked pursuant to this section may reapply for a license upon a showing that any past harvest and sale of illegal timber has been stopped, that the appropriate actions have been taken to prevent it from recurring, and that the proposed licensee and its Affiliates do not knowingly engage in the harvest and sale of illegal timber. Such showing shall be supported by a third party audit conducted by an SFI certification body accredited to conduct SFI 2015-2019 Standard certifications and shall include local expertise as part of the audit team. (d) As used in this section, • "Illegal timber" means timber that is logged, harvested or traded in violation of applicable statutes, regulations, binding administrative directives in force in the country of harvest at the time of harvest which are required by national due diligence schemes to demonstrate legal harvest. • "Affiliate" means any person or entity that directly or indirectly controls, is controlled by, or is under common control with the proposed licensee. • "Control" means owning a majority of the stock, appointing a majority of the directors, or otherwise having the practical or legal power to direct the operations of a person or entity.	2	Task Group has reviewed the comment and considered the proposed new definition of illegal timber. The Task Group has developed a new definition of *illegal logging* which is believes addresses the intent of the comment.	Refer to Section 13 – Definition

[redacted]	illegal logging- the guidance is unclear to me. In some cases, parks have the deeded right to legally harvest timber. This note assumes that there is no possibility of such a right. The phrase where otherwise precluded by indicates preventing something, it then refers to the Lacey Act as an example.	See comment	...cutting in parks, reserves (unless permitted by law) and other similar areas...	2	Task Group has reviewed the comment and concurs. Guidance has been developed to accompany the new definition of *illegal logging*.	Refer to Section 6 – Guidance and Section 13 – Definitions.
[redacted]	Under Program Legality Requirements the imbedded definition of controversial sources should include Forests with Exceptional Conservation Value.	To ensure consistency with recommended change to Section 3.7.1 and the definition of controversial sources in Section 13.	b. fiber sourced from Forests with Exceptional Conservation Value. c. fiber sourced from illegal logging. d. fiber sourced from areas without effective social laws.	2	The Task Group has reviewed the comment and believes the revised definition of controversial sources addresses the intent of the comment. Amongst other items the definition addresses avoiding sourcing from areas with legally required protection of threatened and endangered species, meeting the requirements of CITES (The Convention on International Trade in Endangered Species of Wild Fauna and Flora) and adherence to legally required management of areas with designated high environmental and cultural values,	Refer to Section 13 – Definitions.

[redacted]	1) In the explanation of what forest tree biotechnology constitutes on p.8, most techniques listed are not subject to SFI's policy on Forest Tree Biotechnology, and could therefore be confusing or misleading to readers who are not familiar with each technique to discern it's applicability to the policy. 2) Limit the number of terms used to represent products of tree biotechnology. 3) Point (b) is vague in its reference to taking many years for fiber from genetically engineered forest trees to reach manufacturing facilities. 4) Point (c) is stated in a way that implies there is a lot of uncertainty in the regulation of genetically engineered forest trees, when there is not uncertainty in regard to the regulations in the U.S. or Canada. Also, efforts in the area of ecology, cost and benefits, and sustainability of genetically engineered forest trees have produced useful tools that could be mentioned.	1) Of all the techniques listed in the explanation preamble, only 'genetic engineering (GE)' would be subject to the SFI Policy on Forest Tree Biotechnology. The other techniques do not fall within the scope. For example, genetic markers can be used in traditional tree breeding, while micropropogation and somatic embryogenesis are techniques to grow identical trees. 2) There are 4 different terms used in this section in reference to products: genetically engineered trees, genetically engineered forest trees, genetically modified organisms, genetically-modified trees. It is confusing as a reader to follow what is being discussed with these many terms. 3) There is at least one genetically engineered forest tree that is in review by the USDA for commercial release in the U.S. If this tree is granted 'unregulated status' then it would be planted and grown to maturity in less time than most trees available in the U.S. today. Furthermore, genetically engineered forest trees are being developed in countries that export raw material to the U.S. for furnish in products that carry the SFI label, such as pulp from Brazil. Point (b) makes it appear that only fiber from the U.S. and Canada are within scope. 4) Biotechnology regulations in the U.S. and Canada are not in development as the second sentence implies. The regulations are robust in both countries, have been in place for decades, and are well understood within the forest biotechnology community. The reference to ecological costs and benefits would benefit from mentioning the stewardship tools developed specifically for genetically engineered forest trees in the Responsible Use Principles available free for use at responsibleuse.org.	1) Recommend the following language: forest tree biotechnology: As commonly used, forest tree biotechnology can encompasses a number of different techniques used in growing trees. The SFI Policy on Forest Tree Biotechnology applies to genetically engineered forest trees, which involve the physical manipulation and asexual insertion of genes into the tree. 2) Recommend changing all terms to 'genetically engineered forest trees' wherever possible. 3) Recommend removing point (b). 4) Recommend the following language: SFI Inc. realizes that there is ongoing research to study the ecological risks and benefits of using genetically engineered forest trees. There are efforts to increase the benefits while reducing risks of using genetically engineered forest trees, such as the Responsible Use Principles. SFI Inc. will review such research to understand the impacts of genetically engineered forest trees from an ecological perspective.	2	The Task Group has reviewed the comment. As the SFI Forest Tree Biotechnology Policy is approved by the SFI Board of Directors these suggested revisions will need further assessment and a rationale prepared as to why the revision is required.	None

[redacted]	Within the definition of forest tree biotechnology, reference is made to "development and application of genetic markers". Use of genetic markers does not always indicate use of GMO technology, i.e gene manipulation. Genetic markers could be used in traditional tree improvement techniques so calling them out in this policy may result in misinterpretation in practice.	Development and application of genetic markers could be used in traditional tree improvement techniques so calling them out in this policy may result in misinterpretation in practice.	Remove the reference to genetic markers in the definition.	2	The Task Group has reviewed the comment. As the SFI Forest Tree Biotechnology Policy is approved by the SFI Board of Directors these suggested revisions will need further assessment and a rationale prepared as to why the revision is required.	None

SECTION 9. SFI 2010-2014 AUDIT PROCEDURES AND AUDITOR QUALIFICATIONS AND ACCREDITATION

INTRODUCTION

1. SCOPE

2. NORMATIVE REFERENCE

3. TERMS AND DEFINITIONS

4. PROCEDURES FOR IMPLEMENTING THE PRINCIPLES FOR SFI AUDITING

5. SFI AUDIT ACTIVITIES
5.1 Certification of Multiple Sites
5.2 Substitution and Modification of SFI
5.3 Determination of Conformance
5.4 SFI Technical Audit Report to the Program Participant
5.5 Recertification

6. COMPETENCE AND EVALUATION OF CERTIFICATION BODIES
6.1 Qualifications of audit teams
6.2 Qualifications of auditors
6.3 Maintenance and Improvement of Competence

7. ACCREDITATION OF CERTIFICATION BODIES

Appendix 1: Audits of Multi-Site Organizations [Normative]
INTRODUCTION

All certification, recertification and surveillance audits to section 2 in the *SFI 2010-2014* requirements document shall be conducted by certification bodies accredited by the Standards Council of Canada (SCC) or the ANSI-ASQ National Accreditation Board (ANAB) to conduct *SFI* certification.

Accredited certification bodies are required to:
• maintain audit processes consistent with the requirements of International Organization for standardization (ISO) 17021:2006 conformity assessment — requirements for

bodies providing audit and certification of management systems; and
• conduct audits in accordance with the principles of auditing contained in the ISO 19011:2002 Guidelines for Quality and/or Environmental Management Systems Auditing.

ISO is a worldwide federation of national standards bodies. The preparation of International Standards is conducted by ISO technical committees. The ISO 17021 guidelines were prepared by the ISO Committee on Conformity Assessment (CASCO).

The ISO 19011 guidelines were prepared jointly by Technical Committee ISO/TC 176 for Quality Management and Quality Assurance, and Technical Committee ISO/TC 207 for Environmental Management.

Together these documents provide direction for the design and implementation of management systems audit programs by accredited certification bodies.

1. SCOPE
This *SFI Audit Procedures and Qualifications* document supports the International Standard ISO 19011:2002 Guidelines for Quality and/or Environmental Management Systems Auditing by providing specific requirements to *SFI Program Participants* and *certification bodies*. It is applicable to all forest management and *fiber sourcing* organizations when conducting *third-party* certification, recertification, or surveillance audits to the SFI 2010-2014 Standard.

2. NORMATIVE REFERENCE
Certification bodies and *auditors* must follow International Standard ISO 19011:2002, Guidelines for Quality and/or Environmental Management Systems Auditing, in auditing to the SFI 2010-2014 Standard and International Organization for Standardization (ISO) 17021:2006 conformity assessment-requirements for bodies providing audit and certification of management systems; and all SCC and ANAB requirements.

3. TERMS AND DEFINITIONS
Definitions of terms can be found in the Section 13.

4. PROCEDURES FOR IMPLEMENTING THE PRINCIPLES FOR SFI AUDITING
ISO 17021 Section 4 addresses general *principles* associated with auditing, including impartiality, competence, responsibility, openness, confidentiality and responsiveness to complaints.

All information and documents, including working drafts and reports, shall be considered confidential. *Certification bodies* shall not release any information or documents without the prior written permission of the *Program Participant*. Auditors shall conduct themselves in a professional and ethical manner.

Certification bodies and audit team members and their employers shall not participate in an appraisal or advise a potential purchaser or broker a purchase of property audited within the prior three years without the written permission of the audited party. *Certification bodies*, audit team members, and employers shall notify the audited party of participation in such activities after the three-year period immediately upon initiation of such activities for a period of at least 10 years following the audit.

Prior to engaging in an audit and the *Program Participant's* acceptance of the *audit team*, the *certification bodies* and audit team members shall disclose to the party requesting the audit any prior land appraisal or assessment work or land brokerage activity or other professional services they or their employers conducted related to the property to be audited.

Certification bodies must successfully complete annual witness audits to maintain accreditation status from ANAB or SCC.

5. SFI AUDIT ACTIVITIES

5.1. Certification of multiple sites

ISO/IEC 17021: 2006 clause 9.1.5 specifies that where multisite sampling is utilized for the audit of a client's management system covering the same activity in various locations, the certification body shall develop a sampling program to ensure proper audit of the management system. The rationale for the sampling plan shall be documented for each client.

International Accreditation Forum Mandatory Document 1 (IAF MD 1) provides mandatory guidance for the consistent application of Clause 9.1.5 that is subject to the specific requirements of relevant standards.

Within the context of the SFI 2010-2014 Standard and specific risks associated with certification of *forestry* operations, alternate approaches to IAF MD 1 may achieve the same or greater level of confidence in the conformity of the organization with the *SFI 2010-2014 Standard*. *Certification bodies* may apply alternative sampling approaches to IAF MD 1 to the extent that the approach chosen provides a least the same level of confidence that would be achieved using IAF MD 1. Additional information regarding multi-site certification is included in Appendix 1 of Section 9 in the SFI requirements document.

5.2. Substitution and Modification of SFI

Program Participants, with consent of the *certification body*, may substitute or modify indicators to address local conditions based on a thorough analysis and adequate justification. The *certification body* is responsible for ensuring revised indicators are consistent with the spirit and intent of the *SFI 2010-2014 Standard* performance measures and indicators and with the principles of sustainable forestry, and that the changes are appropriate for specific local conditions and circumstances and the *Program Participant's* scope of operation.

Additional indicators beyond those identified in the *SFI 2010-2014 Standard*, if included by the *Program Participant,* shall be audited like all other indicators.

5.3. Determination of Conformance

The *certification body* shall assess conformance to each element of the *SFI 2010-2014 Standard's*, objectives, performance measures and indicators within the scope of the audit. *SFI 2010-2014 Standard* elements are *objectives*, performance measures and indicators. The introduction to the *SFI 2010-2014 Standard* is informative, and as such, is not an auditable element.

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.

The certification body shall ensure that the *objectives* and scope of the audit:
• allow for accurate field determination of conformance for the entire operating unit;
• verify that the *Program Participant's* SFI program conforms to SFI principles, policies, objectives, performance measures, indicators, and any additional indicators that the *Program Participant* chooses; and
• verify whether the *Program Participant* has effectively implemented its *SFI 2010-2014 Standard* program requirements on the ground.
If a major nonconformity is found, a certificate of conformance shall not be issued until the *certification body* verifies that corrective action approved by the lead auditor has been implemented. A revisit may be required to verify implementation of corrective action.

If a minor nonconformity is found, a certificate of conformance may be issued only after the lead auditor approves a corrective action plan that addresses the nonconformity within an agreed-upon period, not to exceed one year. Verification that the corrective action has been effectively implemented shall occur during the next surveillance audit.

5.4. SFI Technical Audit Report to the Program Participant
ISO 19011 Section 6.6.1 Preparing the Audit Report addresses audit report contents. In addition, the SFI audit report to the Program Participant shall cover:
a. the audit plan;
b. a description of the audit process used;
c. documentation of the rationale for the substitution or modification of any indicators; and
d. a schedule for surveillance and recertification.

See Section 10 in the SFI requirements document regarding the development and release of public summary audit reports.

5.5. Recertification
To maintain a current SFI certificate, Program Participants shall recertify their SFI programs to the SFI Standard every three years.

6. COMPETENCE AND EVALUATION OF CERTIFICATION BODIES

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

6.2. Qualifications of Auditors

ISO 19011 Section 7.3 Knowledge and Skills addresses a broad range of skills required of *auditors*. This is supplemented by ISO 19011 Section 7.3 Education, Work Experience, *Auditor* Training and Audit Experience.

In addition, for certifications to the *SFI 2010-2014 Standard*, *audit team* members shall have the education, formal training and experience that promotes competency in and comprehension of:
a. *forestry* operations as they relate to natural resource management, including *wildlife*, fisheries, recreation, ecology, etc.;
b. international and domestic *sustainable forestry* management systems and performance standards including occupational safety and health, and labor standards; and
c. certification requirements related to the *SFI* program.

Audit team members who have obtained a professional degree in *forestry* or a closely related field shall have a minimum of two years' relevant work experience.

The provisions of Table 1 in ISO 19011 shall not apply to SFI *auditors*.

6.3. Maintenance and Improvement of Competence

All *audit team* members shall pursue ongoing personal and professional development in:
a. forest management science and technology;
b. sustainable forest management systems and certification *programs* and standards;
c. understanding and interpretation of federal, state, and provincial *forestry* and environmental laws and codes of practice; and
d. certification procedures, processes and techniques, especially as these pertain to the *SFI 2010-2014 Standard*.

An *auditor* who maintains Certified Forester, Registrar Accreditation Board, or Canadian Environmental Certification Approvals Board sustainable forest management *auditor* (CEA SFM) certification, or equivalent, shall be considered to have fulfilled continuing education requirements.

7. ACCREDITATION OF CERTIFICATION BODIES

The *SFI* program requires *certification bodies* to be accredited in order to conduct *SFI certifications* and issue certificates.

Certification body: an independent *third party* that is accredited by:
• ANSI-ASQ National Accreditation Board (ANAB) as being competent to conduct certifications to the *SFI 2010-2014 Standard*.
• American National Standards Institute (ANSI) as being competent to conduct certifications to the SFI Chain-of-Custody Standard.
• Standards Council of Canada (SCC) as being competent to conduct certifications to the *SFI 2010-2014 Standard* and the SFI Chain-of-Custody Standard.

APPENDIX 1: AUDITS OF MULTI-SITE ORGANIZATIONS [NORMATIVE]

INTRODUCTION

Multi-site organizations may be audited on a site-by-site basis (all sites visited each year) or, in some cases, on a sample basis.

This appendix expands on Section 5.1 of the SFI Audit Procedures and Auditor Qualifications and accreditation document and provides additional normative guidance for certification bodies wishing to audit multi-site organizations on a sample basis.

1. SCOPE

Audits of multi-site organizations applying a sampling approach to assess conformance with:
• The *SFI 2010-2014 Standard*
• Sections 3 and 4 SFI Chain-Of-Custody Standard and Associated Labels
• Section 4 – *Rules For Use of SFI On-Product Labels*

2. REFERENCES

IAF Mandatory Document for The Certification of Multiple Sites Based on Sampling Issue 1 (IAF MD1: 2007) —(Normative for *SFI 2010-2014 Standard*, Informative for SFI Sections 3 and 4).

IAF Mandatory Document for Duration of QMS and EMS Audits Issue 1 (IAF MD 5: 2009) — (Informative).

3. TERMS AND DEFINITIONS

3.1 Organization: The term organization is used to designate any company or other organization owning a management system subject to audit and certification.

3.2 Site: A site is a permanent location where an organization carries out work or a service.

3.3 Multi-Site Organization: An organization having an identified central function (hereafter referred to as a central office — but not necessarily the headquarters of the organization) at which certain activities are planned, controlled or managed and a network of local offices or branches (sites) at which such activities are fully or partially carried out.

3.4 Group Certification Organization: A specific type of multi-site organization where forest owners, forest owners' organizations, forest managers, forest products manufacturers or forest products distributors without a pre-existing legal or contractual link can form a group for the purposes of achieving certification and gaining eligibility for a sampling approach to certification audits.

4. PROCEDURES FOR IMPLEMENTING AUDITS

4.1 Eligibility Criteria

4.1.1 Multi-site organizations using IAF-MD1 as the basis for sampling shall meet the eligibility criteria established in IAF-MD

4.1.2 Multi-Site Organizations using alternate approaches to sampling provided for in 5.1 of the Audit Procedures and Auditor Qualifications and Accreditation document shall meet the following minimum eligibility criteria:
a. A legal or contractual link shall exist between all sites.
b. The scope and scale of activities carried out by participating sites shall be similar.
c. The management system framework shall be consistent across all sites (allowing for site level procedures to reflect variable local factors).
d. A Central Function (The Central Function comprises the system of processes and procedures necessary to manage the multisite organization and is not a physical location.) shall be established that shall:

i. provide a commitment on behalf of the whole multi-site organization to establish and maintain practices and procedures in accordance with the requirements of the relevant standard;
ii. provide all the sites with information and guidance needed for effective implementation and maintenance of practices and procedures in accordance with the relevant standard;
iii. maintain the organizational or contractual connection with all sites covered by the multisite organization including the right of the Central Function to exclude any site from participation in the certification in case of serious non-conformities with the relevant standard;
iv. keep a register of all the sites of the multi-site organization, including (for *SFI 2010-2014 Standard*) the forest area associated with each participating site;
v. maintain an internal audit or monitoring program sufficient to provide annual performance data on overall organizational conformance with the relevant standard (annual performance data on overall organizational conformance implies that all sites have been internally audited, or monitored, prior to the initial audit and subsequent audit.);
vi. operate a review of the conformity of sites based on results of internal audit and/or monitoring data sufficient to assess Organizational performance as a whole rather than at the individual site level;
vii. establish corrective and preventive measures if required and evaluate the effectiveness of corrective actions taken; and
viii. establish procedures for inclusion of new sites within the multi-site organization including an internal assessment of conformity with the standard, implementation of corrective and preventive measures and a requirement to inform the relevant certification body of changes in participation prior to including the sites within the scope of the certification.

e. Functions and responsibilities of individual sites shall be established for:

i. implementing and maintaining the requirements of the relevant standard
ii. responding effectively to all requests from the Central Function or *certification body* for relevant data, documentation or other information whether in connection with formal audits or reviews or otherwise;
iii. providing full co-operation and assistance in respect of the satisfactory completion of internal audits, reviews, monitoring, relevant routine enquiries or corrective actions; and
iv. implementing relevant corrective and preventive actions established by the central office.

4.1.3 Group certification organizations formed to achieve *SFI 2010-2014 Standard* certification, in addition to meeting either 4.1.1 or 4.1.2, shall submit all the forest area under management within the catchment area for the group certification (i.e. the group certification shall be defined in geographic terms at a logical scale such as county, region, state/province but once defined must include all sites managed by the central function within that geographic area).

4.1.4 For audits of conformance with SFI Section 3 in the SFI requirements document, multi-site organizations using either IAF-MD1 or alternate approaches to sampling shall ensure that all the relevant sites (including the central function) are subject to the organization's internal audit program and shall have been audited in accordance with that program prior to the certification body starting its assessment.

5. SFI MULTI-SITE AUDIT ACTIVITIES

5.1 Sampling Approaches

5.1.1 Certification bodies auditing multi-site organizations using IAF-MD1 as the basis for sampling shall meet the sample selection and intensity criteria established in IAF-MD1

5.1.2 Certification bodies auditing multi-site organizations using alternate approaches as the basis for sampling shall meet the following minimum sample selection and intensity criteria:

a. stratification of the sites included within the multi-site certification based on the scope and scale of activities as well as previous audit findings, complaints and monitoring data collated by the central function (For example in a multi-site organization with three forest management operations and 15 procurement operations at a minimum, separate strata would be required for the woodlands and procurement operations. Under Sections 2 and 3, a range of processing facilities may be included under a single stratum to the extent that the nature and risks associated with the fiber supply are consistent across the facilities e.g. three sawmills a plywood mill and a pulp mill may be included within a single stratum if they are all using fiber with a similar risk profile (such as from a single state/province/region). If one of the sawmills imported tropical hardwoods, it would require a separate stratum.), (In determining the impact of previous audit findings on a sample strategy consideration shall be given to both the need to formally close out prior audit findings (which may require a site visit) and the implications of
previous audit findings for ongoing conformance with the applicable standard(s) by individual sites.);
b. a formal documented evaluation of the inherent and control risks at each of the sites participating in the multi-site certification;
c. a sample strategy designed to specifically address the identified risks;
d. consideration of the need for an element of randomness within the sampling strategy to address previously unidentified risks;
e. in cases where the multi-site organization maintains an internal audit program determined to be reliable the minimum sample size shall in no event be less than (Where n = the number of sites within the stratum.):

i. $\sqrt{(n)}$ for initial certification audits
ii. $0.6\sqrt{(n)}$ for surveillance audits
iii. $0.8\sqrt{(n)}$ for re-certification audits

f. In cases where there the multi-site organization does not maintain an internal audit program determined to be reliable the minimum sample size shall in no event be less

than √(n) for initial certifications, surveillance audits and re-certification audits; and
g. In addition to site audits, the central function shall be audited on an annual basis (Auditing of the central function will be primarily based on interviews, document and record review and may be conducted through any combination of off-site audit activities, additional activities carried out through electronic record access at individual sites or visits to the central office as appropriate.)

5.2 Audit Scope

5.2.1 At a minimum the audit sampling process shall address all elements of the standard on an:

• Annual basis for audits of conformance with SFI Sections 2 and 3 in the SFI requirements document.
• Triennial basis for audits of conformance with the *SFI 2010-2014 Standard*.

5.3 Audit Duration

5.3.1 In determining the overall duration of multi-site audits the underlying objective is to maintain at least the same level of confidence that would be achieved under *IAF MD1*. When calculating audit days, consideration should be given to the general principles guiding audit time calculations outlined in IAF-MD5.

5.4 Non-Conformities

5.4.1 Non-conformities identified at the site or organizational level shall be addressed by the central function considering both the site level implications and the broader implications for the organization as a whole.

5.4.2 Certification bodies shall close out identified nonconformities at the next scheduled audit. This may require an amendment to the site sampling strategy to ensure that open site-level non-conformities are closed out at the next audit (For example, where Operation A has a non-conformity raised in 2010, it will be necessary to close this out in 2011 regardless of whether Operation A was scheduled to be one of the sites sampled in 2011. As a result, the sampling strategy will need to include a process for closing out open site-level non-conformities.)

5.5 Audit Reporting

5.5.1 At a minimum, the *certification body* shall prepare a technical audit report that addresses the multisite organization as a whole. Individual site level reports may be developed to summarize site level findings but do not eliminate the need for an organizational level report.

6. COMPETENCE AND EVALUATION OF CERTIFICATION BODIES

6.1 Prior to conducting multi-site certification under the methodologies described in this appendix certification bodies shall have documented procedures in place to guide audit teams in the planning, conduct and reporting of multi-site certification audits.

7. PUBLIC COMMUNICATION AND CLAIMS REGARDING MULTI-SITE CERTIFICATES

7.1 Certification bodies shall prepare a summary audit report that, in addition to the requirements of the SFI Public Communications and Claims (Section 10) document, indicates:

a. the fact that the certification is a multi-site certification;
b. whether the multi-site organization is a group certification organization;
c. the sampling approach (strata, location, number of sites sampled and the percentage of sites sampled within each stratum); and
d. any changes in the scope of the multi-site certification since the last public summary report.

7.2 Certificates issued to multi-site organizations shall be issued to the central function and include an appendix listing the participating sites. The central function shall provide a copy of the certificate to all participating sites. The certificate shall list all participants.

8. INTERPRETATIONS, PUBLIC INQUIRIES, AND OFFICIAL COMPLAINTS

8.1 In assessing the validity of complaints raised in relation to a specific site within a multi-site organization, certification bodies shall investigate the complaint at the site level and (where relevant) at the organizational level (For example, where a complaint has implications for the effectiveness of a process carried out by the central function (such as procedures, monitoring or internal audit) then the implications for the reliability of information from other sites within the organization shall also be considered.)

	Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
	The comment above regarding adding a second 60 day comment period is not entirely accurate.	During the review for the SFI 2010-2014 standard, the revised standard was posted to the website after the annual conference. Instructions given at that time to PPs was to contact SFI if any significant errors or omissions were noted on their final read. It was not another written comment period. This also satisfied a PEFC requirement for a 60 day final consultation. The change mentioned above actually was made and approved by the Board in 2012. It was the way SFI operated and adding it to the process explicilty and using PEFC terminology brought SFI into conformance with PEFC standard setting requirements.		3	Comment is noted and will be considered when revised the process after this standard revision.	None
	Suggest including SIC membership on the Resource Committee reviewing and drafting standard revisions	The SIC that represents the area where I work, includes approximately 39% of the certified forest area in North America, yet there is no direct representation in the review process.		3	Comment is noted. Several of the Task Group members are also SIC members for their respective states and provinces.	None

1 = final decision subject to review of language developed
2 = discussion required, comment may or may not be incorporated
3 = general comments, comments covered in other areas
4 = comments addressed by other SFI review task force

	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. Doesn't add value to a mature system.	maintain an internal audit sampling system to monitor..... BUT LOCATE IN EACH STANDARD	2	The Steering Committee Task has reviewed the comment and believes that Section 9 is the best pace to address internal audits. Note however that the revised SFI Chain of Custody now has specific requirement for an internal audit.	Refer to revised Section 9 and SFI 2015-2019 Chain of Custody Standard.
	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	Comment addressed in Section 10 comments.	Refer to Section 10.
	On public lands with indigenous peoples traditional lands certification and re-certification 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	The Task Group believes that the proposed new Objective 8 addresses this comment.	Refer to SFI 2015-2019 Forest Management Standard Objective 8.
	Conversion of Natural Forest to Plantation. No specific objective or performance measure is required in the SFI 2015-2019 standard.	Make it mandatory that certifiers consult extensively with local stakeholders including ENGOs and First Nations and indigenous peoples during the auditing process. In addition to the improvements recommended above, Canopy encourages SFI to include specific language in the standard to address this.		2	Task group has reviewed the comment and believes that the Indicator 1.2.1 and the corresponding guidance for PM 1.2 address the comment.	Refer to Ind. 1.2.1 & PM 1.2 Guidance - SFI Section 6 Guidance

	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 re-certifications 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.	None
	The section on Multi-sites needs to be more prevalent and not buried way back here in the section on auditing.			2	The Steering Committee has reviewed the comment and believes that multi-site auditing requirements are best addressed in Section 9.	Refer to SFI Section 9 - Audit Procedures and Auditor Qualifications and Accreditation.

SECTION 10. COMMUNICATIONS AND PUBLIC REPORTING

PREPARING AND SUBMITTING A PUBLIC REPORT

A *certified Program Participant* shall provide a summary audit report (one copy must be in English) to *SFI Inc.* after the successful completion of certification, recertification, or surveillance audit to the *SFI 2010-2014 Standard*. The summary audit report will be posted on the *SFI Inc.* website (www.sfiprogram.org) for public review.

The *certification body* shall prepare the summary audit report, which 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* forest land 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.

	Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
	Multi-site for internal audits?? Clarify if there should be an internal audit for procurement audit.			3	Comment is not pertinent to this section however regarding the requirement for internal audits of multi-site procurement systems this is addressed in Section 9. Appendix 1 of Section 9 states that audits of multi-site organizations certified to Section 4 of the SFI program must be conducted in accordance with IAF MD-01 (IAF Mandatory Document for The Certification of Multiple Sites Based on Sampling Issue 1).	None
	It is confusing – do we need to do them when/where. If in an ISO document, should it be added to Section 9. Important elements of ISO should be called out in Section 9.			3	Requirements for conduct of internal audits are included in Section 9	None

[redacted]	In section 5.5 Recertification, I propose changing to program participant recertification ot every five years.	To reduce audit costs	To maintain a current SFI certificate, Program Participants shall recertify their SFI programs to the SFI Standard every three years.	3	SFI is working with the relevant bodies (ANAB, IAF) to ensure that SFI can move its certification cycle from 3 years to 5 years.	None
[redacted]	For Section 9 (5.5) in Audit Procedures and Auditor Qualifications & Accreditation. We recommend that program certificates recertify to the SFI standard every 5 years instead of every 3.	To align better with FSC for improved audit coordination on dual certified properties.	"Program certificates shall recertify their SFI programs to the SFI standard every 5 years"	3	SFI is working with the relevant bodies (ANAB, IAF) to ensure that SFI can move its certification cycle from 3 years to 5 years.	None
[redacted]	Recommend changing time frame (5.5.5 above) for full recertification audit to 5-years to be consistent with other certification systems.	To be consistent with other certification systems and thus reduce burden on program participants.	Recommend changing time frame (5.5.5 above) for full recertification audit to 5-years to be consistent with other certification systems.	3	SFI is working with the relevant bodies (ANAB, IAF) to ensure that SFI can move its certification cycle from 3 years to 5 years.	None
[redacted]	Shouldn't these references be made to the new draft standard as opposed to the 2010-2014 standard?			3	General Comment – edits will be made.	None
[redacted]	For Section 5.5 recommend a return to a 5 year re-certification audit cycle.	Changing back to a 5 year cycle would be consistent with other certification systems and reduce cost of certification for program participants. participants.	5.5 Recertification. To maintain a current SFI certificate, program participants shall recertify their SFI programs to the SFI standard every five years.	3	SFI is working with the relevant bodies (ANAB, IAF) to ensure that SFI can move its certification cycle from 3 years to 5 years.	None
[redacted]	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	The public audit report is a summary of the audit. The current requirement for the public audit report is a list of the main pieces of objective evidence used to establish the degree of conformance for each SFI Objective within the scope of the audit along with any non-conformities and corrective action plans to address them and any opportunities for improvement.	None
[redacted]	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	The public audit report is a summary of the audit. The current requirement for the public audit report is a list of the main pieces of objective evidence used to establish the degree of conformance for each SFI Objective within the scope of the audit along with any non-conformities and corrective action plans to address them and any opportunities for improvement.	None

[redacted]	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	The public audit report is a summary of the audit. The current requirement for the public audit report is a list of the main pieces of objective evidence used to establish the degree of conformance for each SFI Objective within the scope of the audit along with any non-conformities and corrective action plans to address them and any opportunities for improvement.	None

SECTION 13. SFI DEFINITIONS

The following definitions apply to *italicized* words in the *Requirements for the SFI 2015-2019 Program: Standards, Rules for Label Use, Procedures and Guidance*.

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

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.

American Tree Farm System®: A national program that promotes the sustainable management of forests through education and outreach to private forest landowners.

aquatic habitat: An area where water is the principal medium and that provides the resources and environmental conditions to support occupancy, survival and reproduction by individuals of a given species.

aquatic species: Animals that live on or within water during some stage of their development.

auditor: A person with the competence to conduct an audit (ISO 19011:2002, 3.8).

audit team: One or more auditors conducting an audit, supported if needed by *technical experts* (ISO 19011:2002, 3.9).

available regulatory action information: Statistics or regulatory compliance data collected by a federal, state, provincial, or local government agency. Note: Although conformance with laws is the intent, *certification bodies* are directed to look for a spirit and general record of compliance rather than isolated or unusual instances of deviation.

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.

best scientific information: Available factual information that is generally accepted by the broad scientific community. It includes but is not limited to peer-reviewed scientific information obtainable from any source including government and non-governmental sources that have been verified by field testing to the maximum extent feasible.

biodiversity hotspots: A biogeographic *conservation* region with more than 1,500 endemic plant species and less than 30 percent of its historical extent (Further information can be found under Descriptions of *biodiversity hotspots* and High-Biodiversity Wilderness Areas in section 6 of the SFI requirements document posted under resources on the SFI website at www.sfiprogram.org.)

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.

certification body: An independent *third party* that is accredited by:

- ANSI-ASQ National Accreditation Board (ANAB) as being competent to conduct certifications to the *SFI 2015-2019 Standard*.
- American National Standards Institute (ANSI) as being competent to conduct certifications to the SFI Chain-of-Custody Standard.
- Standards Council of Canada (SCC) as being competent to conduct certifications to the *SFI 2015-2019 Standard* and the SFI Chain-of-Custody Standard.

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 2015-2019 Standard* (objectives for land management)
- Canadian Standards Association (CAN/CSA-Z809)
- Canadian Standards Association (CAN/CSA-Z804)
- 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 *Certified 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.

Pre-Consumer Recycled Content: Material diverted from the waste stream during a manufacturing process. it does not include materials such as rework, regrind or scrap generated in a process and capable of being reclaimed within the same process.

Any claims about *pre-consumer recycled content* and *Certified Program Participants* or label users shall be accurate and consistent with applicable law. Certified 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.

	Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
	Where would PEFC certified content be counted?	Clarify that the only certified forest content is that from SFI, ATFS, CSA forests, not from other PEFC certified forests.		3	This is the current definition of *certified forest content* in Section 13 - Definitions and Task Group believes that the existing requirement is sufficiently clear.	Refer to Section 13 – Definitions.

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*.

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 2015-2019 Standard*, and who has been certified by an accredited *SFI certification body* to be in conformance with the *SFI 2015-2019 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).

certified sourcing: is defined as raw material sourced from the following sources confirmed by a *certification body*:

• Fiber that conforms with objectives 9-21 of Section 2 - SFI 2015-2019 Standard's *fiber sourcing* requirements, and/or;

• *Pre-Consumer Recycled Content*: Material diverted from the waste stream during a manufacturing process. It does not include materials such as rework, regrind or scrap generated in a process and capable of being reclaimed within the same process;

Any claims about *pre-consumer recycled content* by *Certified Program Participants* or *label users* shall be accurate and consistent with applicable law. *Certified 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 and/or;

• *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.

Any claims about *post-consumer recycled content* by *Certified Program Participants* and *label users* shall be accurate and consistent with applicable law. *Certified 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 and/or;

• *Certified forest content*, which includes content from specific forest tracts that are third-party certified to conform with the SFI 2015-2019 Standard's forest land management requirements (Objectives 1-8 and 16-21) or other acceptable forest management standards (e.g. CAN/CSA-Z809, CAN/CSA-Z804 and ATFS);

• *Non-controversial sources*: If the raw material is sourced from outside of the United States and Canada, the organization shall establish adequate measures to ensure that the labeled products do not come from *controversial sources*. See Section 3, 3.7 and Section 4, 6.1 on the process to avoid *controversial sources*. Up to one third of the supply for *secondary producers* can come from *non-controversial sources* for use of the *certified sourcing* label; the other two-thirds must come from the sources defined under the certified sourcing definition— fiber that conforms with objectives 9-21 of Section 2, and/or *pre consumer recycled content, and/or post consumer recycled content*, and/or *certified forest content*.

climate change:
A change in the state of the climate that can be identified (e.g. by using statistical tests) by changes in the mean and/or the variability of its properties and that persists for an extended period typically decades or longer. Climate change may be due to natural internal processes or external forcings or to persistent anthropogenic changes in the composition of the atmosphere or in land use. Note: taken from the Intergovernmental Panel on Climate Change (IPPC).

	Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
	Missing an opportunity to marked North American wood and wood products regarding impacts to climate change.	Strengthen it to show the advantages (energy savings) of using North American virgin wood rather than reconstituting (more fossil fuels used to manufacture) and clarify climate change is linked to fossil fuels more than forestry.		2	Task Group has reviewed the comment but is of the opinion that use of definitions is not the proper means to promote one position or another.	Refer to Section 13 – Definitions.

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

	Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language

	PROTECT/PROTECTION occurs 49 times in the Standard. Additional discussion is needed regarding the word PROTECT/PROTECTION as written/defined in the standard and cross reference with definition used in Standard. To date there has not been an issue with the definition of PROTECTION; however, if the forest industry is ever challenged, companies would have a difficult time proving that they are "protecting" values such as species at risk 100% of the time. To many people, the word PROTECTION implies a "hands-off" approach to management, while the word CONSERVATION implies management through "wise use" of resources.		Use "conservation" in place of "protection" where management is implied as an appropriate practice.	3	The term protection and conservation are defined terms in SFI. Conservation requires protection and protection does allow for active management (including harvest).	Refer to Section 13 – Definitions.
	Conservation is more than simply "protection"	Conservation refers to restoration and/or wise use of a resource as well as "protection". .	Conservation is defined as the careful utilization, protection, or restoration of a natural resource or the natural environment.	3	General comment.	None

controversial sources:

a) Forest activities which are not in compliance with applicable state, provincial or federal laws, particularly as they may relate to:
- legally required protection of threatened and endangered species,
- requirements of CITES (The Convention on International Trade in Endangered Species of Wild Fauna and Flora)
- legally required management of areas with designated high environmental and cultural values,
- labor regulations relating to forest workers,
- indigenous peoples' property, tenure and use rights

b) fiber sourced from illegal logging.
c) fiber sourced from areas without effective social laws

Note: Conversion sources cannot be included when calculating certified forest content

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 European Union Timber Regulation (EUTR), or other relevant state, provincial, or federal legislation. The Lacey Act 1 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 Indian tribe, or any foreign law that protects plants. The EUTR2 prohibits illegally harvested timber or products derived from such timber to be brought into the EU, and creates obligations for operators who place timber and timber products on the EU market. In addition, see Section 7 in the SFI requirements document, SFI Legality Requirements and Policies for Avoidance of Illegal Logging, for SFI Inc. Policy on Illegal Logging.

1 The Food, Conservation, and Energy Act of 2008 (Pub.L. 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).

2 Regulation EU No 995/2010 of the European Parliament and of the Council of 20 October 2010.

fiber sourced from areas without effective social laws: The United States and Canada have a strong legal framework. Fiber from countries without effective laws addressing the

following will need a risk assessment:

1. workers' health and safety;
2. fair labor practices;
3. indigenous peoples' rights;
4. anti-discrimination and anti-harassment measures;
5. prevailing wages; and
6. workers' right to organize.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
Too narrow to just Indigenous Peoples' "property, tenure and use rights"	Remove "indigenous", use "other peoples'"		2	The reference to Indigenous Peoples is intended to align the SFI definition of *controversial sources* with that used by PEFC. This alignment is important for the ongoing endorsement of the SFI forest management requirements by PEFC.	Refer to Section 13 – Definitions.
Controversial Source – "Note: conversion sources cannot be included… What about wood from house lots, and roads from uncertified lands?	Use some of the thinking from the PEFC risk assessment requirements		2	Task Group believes that the revised definition of *controversial sources* addresses the comment.	Refer to Section 13 – Definitions.
SFM must be more than merely complying with existing law regardless of the level of enforcement	By applying internationally agreed upon conventions clarity is provided as well as protection against national based trade barriers	a) Forest activities which are not in compliance with applicable state, provincial or federal laws, particularly as they may relate to: • legally required protection of threatened and endangered species, • requirements of CITES (The Convention on International Trade in Endangered Species of Wild Fauna and Flora) • legally required management of areas with designated high environmental and cultural values, • ILO core labor standards, • indigenous peoples' property, tenure and use rights	2	The Task Group has reviewed the comment and believes that the revised definition of *controversial sources* addresses the intent of the comment. While the definition does not specifically reference the ILO Core Conventions the definition does address avoiding sourcing from areas without effective social laws which could include identifying countries with ineffective labor laws or the absence of labor legislation. Also, SFI forest management requirements have consistently met the PEFC endorsement requirements which include conformance with ILO Core Conventions 87, 98 and 111.	Refer to Section 13 – Definitions.

[redacted]	At a minimum, expand the definition of SFI controversial sources to protect against ecological threats that go beyond basic legality requirements. This would include language prohibiting conversion or degradation of natural forests or areas with valuable biodiversity. It would also include requirements for companies to monitor sources for unacceptable wood or fiber that could be coming from these controversial sources. If tracking and documentation of controversial source to asses risk identifies a source as potentially controversial, the standard should go beyond desk audits and include field verification of sourcing claims.	There are no substantive additions to the definition of controversial sources. We acknowledge SFI's new indicator that indicates logging in the United States and Canada has the potential to be illegal. However, language to prevent the inclusion of controversial sources in SFI certified products remains inadequate. The latest changes to the SFI definition of 'controversial sources' predominately stipulate that legal requirements and regulations must be met for a source to be deemed non-controversial. These legal requirements exist independent of the SFI standard and stating that sourcing must obey existing legal requirements adds no rigor to the SFI standard when these laws, by definition, must already be obeyed.	At a minimum, expand the definition of SFI controversial sources to protect against ecological threats that go beyond basic legality requirements. This would include language prohibiting conversion or degradation of natural forests or areas with valuable biodiversity. It would also include requirements for companies to monitor sources for unacceptable wood or fiber that could be coming from these controversial sources. If tracking and documentation of controversial source to asses risk identifies a source as potentially controversial, the standard should go beyond desk audits and include field verification of sourcing claims.	2	The Task Group has reviewed the comment and believes that the following new features of the SFI program address the comments. First, the SFI Chain of Custody has expanded its process for conducting a risk assessment for avoidance of sourcing from *controversial sources*. Secondly the definition of *controversial sources* has been expanded to include a prohibition on fiber from areas where the conversion does not meet federal or provincial/state laws.	Refer to SFI 2015-2019 Chain of Custody Part 4 and Section 13 – Definitions.
[redacted]	illegal logging definition does not account for parks that have legal right to harvest some timber		.....cutting in parks, reserves (unless permitted by law) or other similar areas.....	2	Task Group has reviewed the comment and believes that the revised definition of illegal logging and the accompanying guidance for illegal logging addresses the comment.	Refer to Section 6 – Guidance and Section 13 - Definitions
[redacted]	Remove conversion sources from controversial sources or clarify the expectations of CoC holders regarding conversion sources. The current language implies that 3.7.1-3.7.2 applies to conversion sources. This would mean that a company would have to obtain a signed declaration that includes language around conversion sources. This seems counter to the intent. Move the line about conversion sources regarding certified content to the sections of the CoC standard related to calculating certified content and the certified content definitions	Clarify the expectations related to conversion sources	Remove mention of conversion sources in the controversial sources definition and in Section 3.7 of the CoC standard	2	Task *Group* has reviewed the comment but is of the opinion that the inclusion of *conversion sources* in the *controversial sources* definition and in Part 4 of the SFI Chain of Custody Standard enhance the rigor of the Standard.	Refer to SFI 2015-2019 Chain of Custody Standard and Section 13 - Definitions

[redacted]	The definition of 'controversial sources' should include Forests with Exceptional Conservation Value.	There should be an assurance that fiber sourced without a SFI chain of custody claim and valid certificate or other credible chain of custody standard claim and valid certificate does not originate from FECV. Otherwise certified program participants will not be able claim that all the fiber they source is from legal and responsible sources, regardless of whether it is from certified or uncertified forests.	Controversial Sources: b. fiber sourced from Forests with Exceptional Conservation Value. c. fiber sourced from illegal logging. d. fiber sourced from areas without effective social laws.	2	The Task Group has reviewed the comment and believes the revised definition of controversial sources addresses the intent of the comment. Amongst other items the definition addresses avoiding sourcing from areas with legally required protection of threatened and endangered species, meeting the requirements of CITES (The Convention on International Trade in Endangered Species of Wild Fauna and Flora) and adherence to legally required management of areas with designated high environmental and cultural values,	Refer to Section 13 – Definitions.
[redacted]	Where would PEFC certified content be counted?	Clarify that the only certified forest content is that from SFI, ATFS, CSA forests, not from other PEFC certified forests.		3	This is the current requirement in SFI Chain of Custody Standard and the definition of certified forest content as defined in Section 13 – Definitions.	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*.

	Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
[redacted]	Pat Moss or cranberry bogs: Is it a forest product? Is it considered in conversion or not?	Consider implications to definitions of conversion and wetlands		2	The Task Group has reviewed the comment but does not understand the issue outlined in the comment. Comment appears to be referencing conversion of existing peat/cranberry bogs and not conversion of forest land.	None

	This makes wood from SFI-certified forests to be non-certified if its harvest resulted in a conversion.	Problem is that the conversion could be beyond the control of the forest manager - for example, the clearing of a well pad by the mineral rights owner. In many cases this wood is removed by the forest manager - how would the manufacturer know that this wood off an SFI-certified forest is non-certified?	This term and language needs to be removed from the chain-of-custody document	2	The Task Group has reviewed the comment and believes the following new or revised requirements in the SFI program address the comment. SFI has developed new requirements in its forest management requirement (Section 2 – SFI 2015-2019) addressing conversion of one forest cover type to another forest cover type (Performance Measure 1.2) and conversion of forestland to other land uses (Performance Measure 1.3). The Task Group has developed accompanying guidance for PM 1.2 and 1.3. Finally, the definition of controversial sources has been expanded to include avoidance of fiber from sources where the conversion is not in accordance with federal, state/provincial legislation.	Refer to SFI 2015-2019 Forest Management Standard Performance Measures 1.2 and 1.3, Section 6 – Guidance and Section 13 – Definitions.
	Conversion: It is not appropriate, nor necessary , for SFI to dictate whether conversion from one native forest type to another is acceptable or at what scale. That decision should be made by the forest manager/owner, and should be determined based on the forest management plan, current and desired future conditions, and relevant social and economic factors. It is the role of the auditor to weigh, holistically, the managment of the forest against the entire SFI Standard. SFI should delete this Performance measure and related indicators, or at a minimum, more narrowly define "forest type conversion" to focus on conversions to non-native forest types.			2	The Task Group has reviewed the comment but believes that the SFI 2015-2019 benefits from the addition of normative language addressing conversion of one forest cover type to another forest cover type.	Refer to SFI 2015-2019 Forest Management Standard PM 1.2. SFI 2015-2019.
	Conversion to non-forest uses: SFI needs to build in some flexibility and outline the process by which such lands should be removed from SFI certification. The current language may be ineffective and futhremore, there may be still ecological and social benefits to certifying forestland until such time that it is actually converted.			2	Task Group has reviewed the comment and believes that the new SFI 2015-2019 Performance Measure 1.3 and the accompanying guidance in Section 6 address the comment.	Refer to SFI 2015-2019 Forest Management Standard PM 1.3 SFI 2015-2019 and Section 6 – Guidance.

critically imperiled: A plant or animal or community, often referred to as G1, that is globally extremely rare or, because of some factor(s), especially vulnerable to extinction. Typically, five or fewer occurrences or populations remain, or very few individuals (<1,000), acres (<2,000 acres or 809 hectares), or linear miles (<10 miles or 16 kilometers) exist (Further information can be found under *Forests with Exceptional Conservation Value* in section 6 of the SFI requirements document).

culturally important: having significance for or being representative of human activities or beliefs (e.g. documented areas such as cemeteries, sacred sites).

degree: A professional academic *degree* (e.g. bachelor's) or equivalent.

direct supplier: An individual or organization with whom a *Certified Program Participant* has a direct contractual relationship for *fiber sourcing*.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
Would this definition exclude gate wood?			3	The definition is intended for those suppliers who are *wood producers* that have the contract with the *certified program participant.*	None

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

ecosystem services: Components of nature, directly enjoyed, consumed, or used to yield human well-being.

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.)

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
Does this wording potentially restrict the use of "assisted migration" - a term used to describe the introduction of tree species outside of their historic range, in anticipation of suitable ecological conditions existing due to climate change.			2	The Task Group has reviewed the comment and is of the opinion that the intent of this definition does not to preclude testing of other species in a response to climate change (assisted migration). Likewise the SFI 2015-2019 requirements do not prohibit the conduct of research to assess the impacts of climate change and the benefits of assisted migration.	None
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	Task Group has reviewed this comment and believes that removal of the 2nd sentence in the definition could be interpreted by some as meaning that research into assisted migration (where trees are introduced from outside the natural range for that species) could be viewed as the introduction of an exotic species.	None

fiber sourcing: Acquisition of roundwood (e.g. sawlogs or pulpwood) and field-manufactured or primary-mill residual chips, pulp and veneer to support a forest products facility.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language

	"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 make claims like, “These materials come from a process that is certified to meet SFI responsible fiber sourcing requirements.”	2	Items noted in comment will be addressed when the Fiber Sourcing requirements are moved into a separate standard.	None

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.

forest tree biotechnology: As commonly used, *forest tree biotechnology* encompasses structural and functional studies of genes and genomes (including development and application of genetic markers); various methods of vegetative reproduction such as micro-propagation, tissue culture, and somatic embryogenesis; and genetic engineering (GE), which is the physical manipulation and asexual insertion of genes into organisms.

	Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
	Definition includes mention of “genetic markers”. How would this limit ‘marker selected breeding’ technology?	Either exclude the use of ‘marker selected breeding’ or use language that doesn’t prohibit the technology in some way		2	The Task Group has reviewed and will recommend that the developers of the SFI policy on forest tree biotechnology review the comment closely and recommend revisions should they believe this is required.	None

Most techniques listed in this definition are not subject to SFI's policy on Forest Tree Biotechnology, and could therefore be confusing or misleading to readers who are not familiar with each technique to discern it's applicability to the policy.	Only 'genetic engineering (GE)' would be subject to the SFI Policy on Forest Tree Biotechnology. The other techniques do not fall within the scope. For example, genetic markers can be used in traditional tree breeding, while micropropagation and somatic embryogenesis are techniques to grow identical trees.	forest tree biotechnology: As commonly used, forest tree biotechnology can encompasses a number of different techniques used in growing trees. Used in the context of the SFI Policy on Forest Tree Biotechnology, this term applies to genetically engineered forest trees, which involve the physical manipulation and asexual insertion of genes into the tree.	2	The Task Group has reviewed and will recommend that the developers of the SFI policy on forest tree biotechnology review the comment closely and recommend revisions should they believe this is required.	None

forest type: Classification of a forest stand by the dominant tree species or combination of tree species present (examples include pine, oak-hickory, maple-beech-birch, spruce-fir, douglas fir, etc.).

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
The examples are too specific. What about natural transition or succession?	Add language to allow for natural succession and regeneration.		2	The Task Group believes that the proposed definition of *forest cover type* addresses the comment.	Section 13 – Definitions
Examples are too narrow, some use broader categories (e.g. soft or hard wood)	Broaden the examples to include species defined as hard, soft and/or mixed wood		2	The Task Group believes that the proposed definition of *forest cover type* addresses the comment.	Section 13 – Definitions
Examples too specific to apply to Northeastern US or Canadian Maritimes.	We have over 20 commercial species in New Brunswick and they can occur in highly mixed conditions.	add: -Intolerant Hardwood -Tolerant Hardwood to the examples.	2	The Task Group believes that the proposed definition of *forest cover type* addresses the comment.	Section 13 – Definitions
The current definition is too broad and goes to too fine a level of detail. Changes in species, including dominant species, are common in forestry. For example, companies in the PNW routinely harvest stands dominated by western hemlock and plant Douglas-fir. The situations in which species change is an issue should be limited to broad types: conifer to hardwood, for example. In the U.S. South the FIA data seems to distinguish pine from hardwood and distinguish upland from lowland hardwood – perhaps FIA has definitions SFI could use.	The current definition is too broad and is not consistent with current and sound forestry practices.	We do not have a definition to offer, at this point, as a suggestion. However, we are interested in working with you to research a clearer option that arrives at the desired intent and that is also consistent with current practices.	2	The Task Group believes that the proposed definition of *forest cover type* addresses the comment.	Section 13 – Definitions
The definition should reach beyond forest stand.	The forest type should reflect a landscape perspective.	"Classification of a forest stand by the dominant tree species or combination of tree species present on the landscape."	2	The Task Group believes that the proposed definition of *forest cover type* addresses the comment.	Section 13 – Definitions

	This definition does not work in the context of forest conversion restrictions. In Northeast a typical harvest of a spruce-fir stand can become a mixed wood stand with native species. Hardwoods can dominate until the spruce and fir catch up as the stand matures. If that is conversion and prohibited then there will be a lot of land that no longer can be certified.			2	The Task Group believes that the proposed definition of *forest cover type* addresses the comment.	Section 13 – Definitions
	This definition is of concern when taken in context of the proposed PM 1.2 (which we recommend deleting).	See comments under PM 1.2 for rationale for concern.		3	Comment addressed in response given in SFI 2015-2019 Forest Management Standard Performance Measure 1.2.	Refer to SFI 2015-2019 Forest Management Standard Performance Measure 1.2.

forest inventory: 1. A set of *objective* sampling methods that quantify the spatial distribution, composition and rates of change of forest parameters within specified levels of precision for management purposes. **2.** The listing of data from such a survey.

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.

forestry enterprise: A business engaged in the management of forestland, having its own functions and administration and comprising one or more operating units (this does not include independent contractors).

Forests with Exceptional Conservation Value: critically *imperiled* (G1) and *imperiled*(G2) species and ecological communities.

> **critically imperiled**: A plant or animal or community, often referred to as G1, that is globally extremely rare or, because of some factor(s), especially vulnerable to extinction. Typically, five or fewer occurrences or populations remain, or very few individuals (<1,000), acres (<2,000 acres or 809 hectares), or linear miles (<10 miles or 16 kilometers) exist (Further information can be found under *Forests with Exceptional Conservation Value* in section 6 of the SFI requirements document).
>
> **imperiled**: A plant or animal or community, often referred to as G2, that is globally rare or, because of some factor(s), is very vulnerable to extinction or elimination. Typically, six to 20 occurrences, or few remaining individuals (1,000 to 3,000), or acres (2,000 to 10,000 acres or 809 to 4047 hectares), or linear miles (10 to 50 miles or 16 to 80.5 kilometers) exist (Further information can be found under *Forests with Exceptional Conservation Value* in section 6 of the SFI requirements document).

geographic information system (GIS): An organized collection of computer systems, personnel, knowledge and procedures designed to capture, store, update, manipulate, analyze, report and display forms of geographically referenced information and descriptive information.

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.

growing stock: All the trees growing in a forest or in a specified part of it that meet specified standards of size, quality and vigor; generally expressed in terms of number or volume.

growth-and-yield model: A set of relationships, usually expressed as equations and embodied in a computer program or tables, that provides estimates of future *stand* development given initial stand conditions and a specified management regime.

growth and drain: The average annual net increase in the volume of trees during the period between inventories (including the increment in net volume of trees at the beginning of the specific year surviving to its end, plus the net volume of trees reaching the minimum size class during the year, minus the volume of trees that died during the year, and minus the net volume of trees that became cull trees during the year) minus the net volume of *growing stock* trees removed from the *forest inventory* during a specified year by harvesting, cultural operations such as timber *stand* improvement, or land clearing.

habitat: 1. A unit area of environment. **2.** The place, natural or otherwise (including climate, food, cover and water) where an individual or population of animals or plants naturally or normally lives and develops.

high-biodiversity wilderness areas: The world's largest-remaining tracts of tropical forest that are more than 75 percent intact. These areas are characterized by extraordinary biological richness, including exceptional concentrations of endemic species, and are also of crucial importance to climate regulation, watershed *protection*, and maintenance of traditional indigenous lifestyles (Further information can be found under Descriptions of *biodiversity hotspots* and *High-Biodiversity Wilderness Areas* in section 6 of the SFI requirements document).

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 European Union Timber Regulation (EUTR), or other relevant state, provincial, or federal legislation. The Lacey Act 1 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 Indian tribe, or any foreign law that protects plants. The EUTR2 prohibits illegally harvested timber or products derived from such timber to be brought into the EU, and creates obligations for operators who place timber and timber products on the EU market. In addition, see Section 7 in the SFI requirements document, SFI Legality Requirements and Policies for Avoidance of Illegal Logging, for SFI Inc's Policy on Illegal Logging.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
Confusing – if harvested in non-compliance with regulations isn't that "illegal logging"? Further confused by differences between state laws.	Clarify by referencing compliance with U.S. state regulations		2	Task Group believes the comment is addressed with the revised definition of *illegal logging* and the accompanying guidance for *illegal logging*.	Refer to Section 6 – Guidance and Section 13 - Definition
"illegal logging" – "theft of …and cutting in". Confusing – is it theft and cutting in parks or is it theft anywhere AND cutting in parks? What is theft - is it taking a tree without the owners permission to access and knowledge and/or a tree taken with knowledge of access to property but without payment to owner?	Should be "or"		2	Task Group believes the comment is addressed with the revised definition of *illegal logging* and the accompanying guidance for *illegal logging*.	Refer to Section 6 – Guidance and Section 13 - Definition
SICs should promote similar systems to the same level as Maine in states that don't have a strong program.			3	General comment.	None

	illegal logging definition does not account for parks that have legal right to harvest some timber		.....cutting in parks, reserves (unless permitted by law) or other similar areas.....	2	Task Group believes the comment is addressed with the revised definition of illegal logging and the accompanying guidance for illegal logging.	Refer to Section 6 – Guidance and Section 13 - Definition

1 The Food, Conservation, and Energy Act of 2008 (Pub.L. 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).
2 Regulation EU No 995/2010 of the European Parliament and of the Council of 20 October 2010.

imperiled: A plant or animal or community, often referred to as G2, that is globally rare or, because of some factor(s), is very vulnerable to extinction or elimination. Typically, six to 20 occurrences, or few remaining individuals (1,000 to 3,000), or acres (2,000 to 10,000 acres or 809 to 4047 hectares), or linear miles (10 to 50 miles or 16 to 80.5 kilometers) exist (Further information can be found under *Forests with Exceptional Conservation Value* in section 6 of the SFI requirements document).

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

indicator: In the *SFI* program, a specific metric that provides information about an organization's *forestry* and environmental performance, and that is integral to assessing conformance to the *SFI 2015-2019 Standard* objectives and *performance measures*.

integrated pest management: The maintenance of destructive agents, including insects at tolerable levels, by the planned use of a variety of preventive, suppressive or regulatory tactics and strategies that are ecologically and economically efficient and socially acceptable.

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.

land classification: The process of designating areas of land into classes or strata that are sufficiently homogeneous in their physical, vegetative and development attributes.

landscape: 1. A spatial mosaic of several ecosystems, landforms, and plant communities across a defined area irrespective of ownership or other artificial boundaries and repeated in similar form throughout. **2.** An area of land characterized by
- similar biogeoclimatic conditions that influence site potential;
- similar historical disturbance regimes that influence vegetation structure and species composition; and
- sufficient size to provide the range of *habitat* conditions for naturally occurring communities (except for a few megafauna with large spatial needs, e.g. wolves).

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

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

long-term: Extending over a relatively long time period – for the *SFI 2015-2019 Standard*, this means the length of one forest management rotation or longer.

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

major nonconformity: One or more of the *SFI 2015-2019 Standard performance measures* or *indicators* has not been addressed or has not been implemented to the extent that a systematic failure of a *Certified Program Participant's SFI* system to meet an SFI *objective*, *performance measure* or *indicator* occurs.

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

minor nonconformity: An isolated lapse in *SFI 2015-2019 Standard program* implementation which does not indicate a systematic failure to consistently meet an SFI *objective*, *performance measure* or *indicator*.

native: Species of ecological communities occurring naturally in an area, as neither a direct or indirect consequence of recent human activity.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
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	Task Group has reviewed the comment and believes the current definition of *native* continues to be effective as written.	None

natural regeneration: Establishment of a plant or a plant age class from natural seeding, sprouting, suckering or layering.

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.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
Not necessarily transitional. Why have a separate definition for "non-forest wetland" and one for "wetland"?	A non-forested wetland is simply a wetland that does not support trees, typically due to the length of time the area is inundated with water.	Remove this item from the definition list and simply refer to "wetland" definition (see wetland definition comments). Otherwise, provide a separate definition for "open-water or non-forested" wetlands and contrast with a definition for "forested" wetlands	2	Task Group has reviewed the comment but believes that maintaining the two definitions helps address the full spectrum of categories of wetlands.	Refer to Section 13 – Definitions

objective: In the *SFI* program, a fundamental goal of sustainable forest management as embodied in O*bjectives* 1–21 of the *SFI 2015-2019 Standard*.

old-growth forests: A forested ecosystem distinguished by old trees and related structural attributes, such as tree size, down woody debris, canopy levels, and species composition. *Certified Program Participant*s should utilize a definition specific to their region and particular forest types.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
old trees has no meaning	Need to use a more science based definition	old-growth forests: A forested ecosystem distinguished by late succession and related structural attributes, such as tree size, down woody debris, canopy levels, and species composition	2	The Task Group has reviewed the comment but is of the opinion that the existing SFI definition of *old growth* continues to be an effective definition.	None
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	The Task Group has reviewed the comment and believes the proposed new definitions for *riparian area* and *wetlands* address the comment.	Refer to Section 13 - Definitions

origin: The attributes of the raw material used in the product. This can be *certified forest content*, *certified sourcing* or *pre-consumer or post-consumer recycled content*.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
credit material is not clearly included in the scope of categories of origin	credit SFI paper is bought by printers, but they consistently do not know that credit is an acceptable category of origin and continue to receive non-conformances.	include "SFI volume credit" as an acceptable category of origin.	3	Task Group has reviewed the comment and believes that the Volume Credit claims in the SFI 2015-2019 Chain of Custody, Part 3.7 address the comment.	Refer to Part 3.7 in SFI 2015-2019 Chain of Custody Standard.

other wood supplier: A person or organization who infrequently supplies wood fiber on a small scale, such as farmers and small-scale land-clearing operators.

performance measure: In the *SFI* program, a means of judging whether an *objective* has been fulfilled.

planting: The establishment of a group or *stand* of young trees created by direct seeding or by *planting* seedlings or plantlets.

policy: A written statement of commitment to meet an *objective* or to implement a defined *program* or plan to achieve an *objective* or outcome.

principle: In the *SFI* program, the vision and direction for sustainable forest management as embodied in principles 1–14 of the *SFI 2015-2019 Standard*.

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

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

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language

	PROTECT/PROTECTION occurs 49 times in the Standard. Additional discussion is needed regarding the word PROTECT/PROTECTION as written/defined in the standard and cross reference with definition used in Standard. To date there has not been an issue with the definition of PROTECTION; however, if the forest industry is ever challenged, companies would have a difficult time proving that they are "protecting" values such as species at risk 100% of the time. To many people, the word PROTECTION implies a "hands-off" approach to management, while the word CONSERVATION implies management through "wise use" of resources.		Use "conservation" in place of "protection" where management is implied as an appropriate practice.	2	The term *protection* and *conservation* are defined terms in SFI Section 13 – Definitions. Conservation requires protection and protection does allow for active management (including harvest).	None
	Although this definition gives program participants broad flexibility to manage appropriately ... be that through classic protection, conservation, or active management measures ... the vast majority of the public and society do not interpret "protection" to be this broadly defined. We realize the entire standard was written with this understanding of "protection," and it would require quite a bit of effort to change it, SFI needs to recognize that this creates confusion among program participants and stakeholders.	Although this definition gives program participants broad flexibility to manage appropriately ... be that through classic protection, conservation, or active management measures ... the vast majority of the public and society do not interpret "protection" to be this broadly defined. We realize the entire standard was written with this understanding of "protection," and it would require quite a bit of effort to change it, SFI needs to recognize that this creates confusion among program participants and stakeholders.	Needs more discussion.	2	Task Group has reviewed the comment and understands the concern that the definition of *protection* may not be well understood by the general public. Nonetheless, the Task Group believes that the SFI definition of *protection* and the corresponding definition of *conservation* continue to be credible definitions when taken in the context of the SFI 2015-2019 program requirements.	None

public land: Land enrolled in the *SFI* program that is owned or administratively managed by a government entity (federal, state, provincial, county or local), excluding easements or other encumbrances held by a government entity on private land.
purchased stumpage: standing timber under a contractual agreement that gives the *Certified Program Participant* the right and obligation to harvest the timber.

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* and continuing education requirements recognized by *SFI Implementation Committees* as meeting the spirit and intent of performance measure under Objective 17 of the SFI 2015-2019 Standard.

a. For a logging crew to be considered trained, each crew must operate under the direction of a *qualified logging professional*, that is working as a member of the crew, who has completed the *SFI Implementation Committee* approved state or provincial logger training program.

b. All of the components of a training *program* could take several years to carry out, determining the point at which a logger is considered a *qualified logging professional* should be based on the individual's commitment to the *program*. That is, if a logger completes all the components or modules offered in a given year, that logger should be considered as a *qualified logging professional*. If all available components or modules are not completed, then the logger is no longer considered trained until all available components are completed.

	Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language

The proposed change isn't necessary. The current definition (along with guidance in Interpretation 9.2), essentially allows a QLP to supervise more than one job. Having flexibility in the use of QLP's has worked exceptionally well in Washington State without sacrificing performance in the field. This is proven by the results of third party audits of SFI Program Participants. In addition, requiring a QLP to be onsite working as a member of the crew would be a significant and unnecessary financial burden for many logging companies (wood producers) because they would have send several additional employees through a training program.	We totally disagree with the change in item a. that would require that a QLP be "working as a member of the crew".	a. For a logging crew to be considered trained, each crew must operate under the direction of a qualified logging professional with on-site responsibility, who has completed the SFI Implementation Committee approved state or provincial logger training program.	2	The Task Group has reviewed the comment and is of the opinion that the revised definition of a *qualified logging professional* addresses the comment.	Refer to Section 13 – Definitions.
Who defines QLP and CLP? SICs or SFI national office in DC?	Clarify requirements for QLP and CLP		2	The Task Group believes that the requirements for *qualified logging professional* and *certified logging professional* are clearly stated in SFI 2015-2019 Objective 17 and in the definitions in Section 13 – Definitions.	Refer to Section 13 – Definitions
Need to define "logging crew".	Recommend crew not in definition. Or define crew, or add in a step that the SIC can define.		2	Task Group has reviewed the comment and believes that the revised definition for *qualified logging professional* addresses the comment.	Refer to Section 13 – Definitions
Changes continue to create more lengthy, cumbersome and costly administering, implementing and auditing training programs. Why is that the case?	change back to 2010-2014 language.		2	Task Group has reviewed the comment but is of the opinion that the revised definition of *qualified logging professional* enhances the requirements for logger training and trained logging crews.	Refer to Section 13 – Definitions
This could be prescriptive (require logger attendance records?) – if you don't have it on that day are you in non-conformance?	Remove "crew" add "subject to state SIC" … OR leave language as is in the current Standard		2	Task Group has reviewed the comment and believes that the revised definition for *qualified logging professional* addresses the comment.	Refer to Section 13 – Definitions
"Crew" is not clearly defined, especially where multiple crews may exist and members interact and shift; the QLP could change crews leaving one "crew" with none. Also there is lots of turnover among crew members, or is absent due to being sick, on vacation, leaves for emergency, etc.	Use existing language: "with on-site responsibility". Leave as is		2	Task Group has reviewed the comment and believes that the revised definition for *qualified logging professional* addresses the comment.	Refer to Section 13 – Definitions
Are QLP and Trained loggers the same thing?	Ensure consistency between Guidance and Standard for these terms		2	Task Group has reviewed the comment and believes that the revised definition for *qualified logging professional* addresses the comment. The Task Group has reviewed the Section 6 - Guidance to revise any use of the term "trained loggers" to *qualified logging professional* for consistency.	Refer to Section 13 – Definitions
"QLP: a." - "on-site as a member of the crew" (17.1.5). Too much, and unnecessary - Leave language as is currently.			2	Task Group has reviewed the comment and believes that the revised definition for *qualified logging professional* addresses the comment.	Refer to Section 13 – Definitions

[redacted]	It is problematic to assume a whole "crew" "trained" if the supervisor is trained. Training is for individuals and there are legal requirements for individual training (particularly for operating machinery).	Remove "a. For a logging crew to be considered trained", start sentence with "Each crew must…" OR remove "trained", use "qualified" OR add "SFI" – "considered SFI trained" AND/OR define a "qualified crew"		2	Task Group has reviewed the comment and believes that the revised definition for *qualified logging professional* addresses the comment.	Refer to Section 13 – Definitions
[redacted]	Although this is more time consuming and costly, particularly for small sites/small crews, it is important and improves quality in the woods			2	Task Group has reviewed the comment and believes that the revised definition for *qualified logging professional* addresses the comment.	Refer to Section 13 – Definitions
[redacted]	There are different interpretations of how wide this definition is (e.g. some include truckers, some don't)	For the future…consider replacing "timber harvesting" with "timber operations" to ensure all engaged with forest management activities are trained		2	The Task Group is of the opinion that the comment is addressed by the current SFI definition of w*ood producer* which encompasses all parties involved in "harvesting or regularly supplying wood fiber directly from the forest for commercial purposes". This includes log haul, etc.	Refer to Section 13 – Definitions
[redacted]	Difficult to document and audit	Emphasize "encourage to", not shall		2	Task Group has reviewed the comment and believes that the revised definition for *qualified logging professional* addresses the comment.	Refer to Section 13 – Definitions
[redacted]	Creates a negative feeling, and difficult to implement	Don't make this more difficult; create incentives – use "encourage" not require.		2	Task Group has reviewed the comment and believes that the revised definition for *qualified logging professional* addresses the comment.	Refer to Section 13 – Definitions
[redacted]	Change "program" to "training"			3	General comment.	None
[redacted]	This is good. If not defined as "one per crew", then how would it be limited – by land size, by number of crews? How many crews would be too many for one QLP?	Keep the change		2	Task Group has reviewed the comment and believes that the revised definition for *qualified logging professional* addresses the comment.	Refer to Section 13 – Definitions
[redacted]	Qualified professional logger – 5% as a limit for non-qualified; other wood suppliers – in Quebec and the Maritimes, wood goes through unions; ad hoc deliverer – an ambiguity with respect how we consider small wood suppliers who do so through buyer groups or marketing boards – how do they become a qualified logger because the marketing board? How can the limit of 5% be justified in terms of an environment where the small business owner is buying the wood through a market board?	Should not have a limit. Submit a request for interpretation because the Quebec Maritime context is different. Have a proposal to our task group to deal with this.		2	The Task Group has reviewed the comment but does not believe the revised definition of *qualified logging professional* and the accompanying guidance for deliveries from untrained loggers will be problematic for those jurisdictions with log marketing boards. The SFI program has had a definition for *qualified logging professionals* for several years and this has not posed challenges to implementation of the requirements related to wood producer training.	Refer to Section 13 – Definitions

We totally disagree with the change in item a. that would require that a QLP be "working as a member of the crew".	The proposed change isn't necessary. The current definition (along with guidance in Interpretation 9.2), essentially allows a QLP to supervise more than one job. Having flexibility in the use of QLP's has worked exceptionally well in Washington State without sacrificing performance in the field. This is proven by the results of third party audits of SFI Program Participants. In addition, requiring a QLP to be onsite working as a member of the crew would be a significant and unnecessary financial burden for many logging companies (wood producers) because they would have send several additional employees through a training program.	a. For a logging crew to be considered trained, each crew must operate under the direction of a qualified logging professional with on-site responsibility, who has completed the SFI Implementation Committee approved state or provincial logger training program.	2	Task Group has reviewed the comment and believes that the revised definition for *qualified logging professional* addresses the comment.	Refer to Section 13 – Definitions
My understanding from attending a SFI Standards Workshop was that this definition included the phrase "on-site" member of the crew. It does not seem to be includeded in this version. I do want to make sure this definition does not include a reference to an on-site crew member requirement. The current definition should be kept.	It is unpractical to require a trained person to be on-site at all times.	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 and continuing education requirements recognized by SFI Implementation Committees as meeting the spirit and intent of performance measure under Objective 17 of the SFI 2015-2019 Standard. a. For a logging crew to be considered trained, each crew must operate under the direction of a qualified logging professional, who has completed the SFI Implementation Committee approved state or provincial logger training program. b. All of the components of a training program could take several years to carry out, determining the point at which a logger is considered a qualified logging professional should be based on the individual's commitment to the program. That is, if a logger completes all the components or modules offered in a given year, that logger should be considered as a qualified logging professional. If all available components or modules are not completed, then the logger is no longer considered trained until all available components are completed.	2	Task Group has reviewed the comment and believes that the revised definition for *qualified logging professional* addresses the comment.	Refer to Section 13 – Definitions
Leave out "that is working as a member of the crew" in part a.	Under the direction of a qualified logging professional is enough for a crew to be considered" trained". All depends upon supervision of the job. Current definition eliminates an owner crew of doing work on their own land.	.... Of a qualified logging professional who has completed the SFI.....	2	Task Group has reviewed the comment and believes that the revised definition for *qualified logging professional* addresses the comment.	Refer to Section 13 – Definitions

[redacted]	February 25, 2014 To Whom It May Concern: Associated California Loggers (ACL) respectfully wishes to express its STRONG OPPOSITION to specific proposed revisions to the Sustainable Forestry Initiative standards as proposed for 2015-2019. ACL is recommending that changes be made to these standards before they are adopted. Our reasons, and additional comments, follow below: . THE PROBLEM: The following language as proposed by SFI would be DISASTROUS to loggers and landowners in CALIFORNIA: (BEGIN) 'KEY ENHANCEMENTS" Section 13 -- (a) For a logging crew(emphasis ours) to be considered trained, each crew must operate under the direction of a qualified logging professional that is on-site as a member of the crew(emphasis ours), who has completed the SFI Implementation Committee approved state or provincial logger training program. (END) The problem in California only(to our knowledge) is that "Qualified Logging Professionals" are defined by the California State Implementation Committee(SIC) as those who are approved "by the Department of Forestry and Fire Protection as a Licensed Timber Operator (LTO)…." and each Licensed Timber Operator must carry $1 million in liability insurance. Very few, if any, fallers, "Side Rods" or other crew members individually carry $1 million in liability insurance. At the same time in California only(to the best of our knowledge), the SIC has defined a "Certified Logging Professional" as a logger who has achieved either " the Pro Logger certificate from the Associated California Loggers organization and is current with its requirements…" or the requirements of another logger certification program. A logger who has completed the Associated California Loggers Pro-Logger course not only must be a state "Licensed Timber Operator" and carry the $1 million in insurance, but must also complete extensive courses in Best Operating Practices and Business Practices which – we contend – need not be undertaken by the fallers or even the supervisory personnel such as "Side Rods" who oversee crews. As a further matter of concern, the requirement that "logging crews" each have such qualified or certified logging professionals might extend the requirement of such personnel to multiple logging sides. THE SOLUTION: The solution, as we see it, is to change the proposed language thusly: (BEGIN:) "KEY ENHANCEMENTS" Section 13 (a) For a logging crew to be considered trained, each crew must operate as part of the business operations of a company whose principal is, or principals are, either "Qualified Logging Professionals" or "Certified Logging Professionals" as defined by the relevant State Implementation Committee of the Sustainable Forestry Initiative, and at the level of such training required by landowners. (END) In this manner, the professionalism sought of "Certified Loggers" and "Qualified Logging Professionals" will remain intact and respected, while, at the same time, the logging companies that hold this status will not be required to put someone with personal insurance of $1 million dollars or "Business Practices" training on every crew(which could include every logging side.) At the same time, "Side Rods" and other supervisory personnel will most likely have exactly the kind of "experience and knowledge in the trade" to carry out their timber harvesting duties without need for the certification that their employing company principals have. In short, companies don't entrust expensive equipment and precision timber harvesting work to supervisors who are not experienced. Associated California Loggers urges the Sustainable Forestry Initiative to make this change to the standard as proposed for 2015-2019. FURTHER BACKGROUND ON ASSOCIATED CALIFORNIA LOGGERS AND LOGGER TRAINING: Associated California Loggers represents the largely family-owned, multi-generational loggers and log truckers of California. Loggers and log truckers are the infrastructure for timber harvesting in California, and can provide the workforce for coming developments in the battle against global warming, in the development of woody biomass alternative fuel, and in forest fire prevention, firefighting and clean-up. But we are losing an increasing number of the hard-working and skilled people who perform these tasks. The timber harvesting season is short, existing regulatory requirements are costly, and loggers must look to make a living and pay for government regulation in a short window of time to continue in the trade. As workers quit or retire, a new generation is leery of stepping up to replace them. The timber industry provides good middle-class jobs in rural communities where the unemployment rates are well above those of the rest of California, and where, in recent years, the once-robust timber economy has been transformed, on the North Coast, in the Sierra, and in practically every pocket of rural timberland California by a "replacement" economy of illegal drug production that is criminal, lethally dangerous to timber workers, hikers, campers, and government employees alike. As a matter of concern to California loggers, it is usually regulatory proposals that cause the most "heartburn" as a matter of trying to comply while still making a living within the short California logging season. However, ACL is concerned that language relating to logger training in the SFI standards may work against our interests and should be changed accordingly. But there is a potential conflict here. Several entities have taken positions promoting logger training and certification – including the national American Loggers Council of which ACL is a member -- and ACL wishes to honor the positions of all these "pro-logger training" entities while warning SFI of "unanticipated adverse consequences" that may not have been intended by the proponents, but which, nonetheless, in California, will harm logging companies – and the landowners who employ them -- if not addressed. For these reasons, while Associated California Loggers urges SFI to	Section 13 (a) For a logging crew to be considered trained, each crew must operate as part of the business operations of a company whose principal is, or principals are either "Qualified Logging Professionals" or "Certified Logging Professionals" as defined by the relevant State Implementation Committee of the Sustainable Forestry Initiative, and at the level of such training required by landowners. See "Comment" letter.	2	Task Group has reviewed the comment and believes that the revised definition for *qualified logging professional* addresses the comment.	Refer to Section 13 – Definitions

	The Oregon SFI SIC (Oregon) encourages members to participate in the SFI 2015-2019 Standard review process by submitting comments. By unanimous vote following extensive discussion at a formal meeting of the Oregon SFI SIC on February 12th 2014, the Oregon SFI SIC submits the following comments. Oregon has significant reservations regarding proposed changes to the definition of a Qualified Logging Professional. The proposed definition does not recognize contractual bindings of typical contracts between loggers and SFI participants. SFI Participants contract with logging companies as the legal entity under which a contract is executed. Furthermore, SFI Participants do not necessarily contract with the 'individual' who may be 'trained'. Requiring the contracted logger to have a trained individual direct the crew places SFI participants in a compromising legal position. While SFI Participants can contractually require the logging company to be a Qualified Logging Professional, designation of who is directing the harvest must contractually remain at the discretion of the logging company. The definition, as currently proposed, threatens to expose a contracted entity to external auditing during the audit of a SFI participant. The SFI Standards need to maintain a clear distinction that only the SFI participant is subject to providing evidence of conformance to SFI Standards without subjecting a contracted entity to provide additional evidence. Most importantly, Oregon believes that each SIC is responsible for determining who is considered a Qualified Logging Professional, whether it be an entity or individual, through recognition of training programs. We understand that there are legitimate issues underlying the proposed revision to the definition. It is the Oregon SIC's opinion that those problems do not exist in Oregon. Furthermore, Oregon recognizes that the Oregon Professional Logger Program (OPL) has implemented continued improvement measures over the years and should continue to do so. It is the majority view that Oregon supports the OPL as a viable logger-training program. The SFI Standards is being successfully implemented in Oregon as evidenced through thorough third party auditing of SFI Participants. We believe that local problems are best addressed by the respective state SIC and not applied to the entire North American SFI Standards. Therefore, the Oregon SFI SIC makes the following recommendations to the definition of a Qualified Logging Professional.	The Oregon SFI SIC believes the SFI definition for a Qualified Logging Professional must recognize the contractual relationships involved in harvesting forest products, especially from SFI participants. These contractual relationships are typically between a logging company and the land or timber owner. Therefore, the proper reporting relationship is with the logging entity. Furthermore, SFI participants must maintain a clear separation of any resemblance of an employee/employer relationship. Requiring that any person direct a logging job could compromise a delicate legal standing for SFI participants. Contracts are the means by which responsibility for harvesting timber is legally administered in Oregon. The SFI Standard cannot circumvent contractual law pursuant to 2010-2014 Objective 14 (2015-2019 Objective 15) of the SFI Standard. It is Oregon's hope that the suggested revisions will provide SFI a solution to legitimate issues elsewhere AND allow Oregon to meet its unique challenges.	qualified logging professional: A logging company with specialized equipment for timber harvesting or person with specialized skills in timber harvesting gained through experience or formal training who has successfully completed wood producer training programs and continuing education requirements recognized by SFI implementation committees as meeting the spirit and intent of the performance measure under Objective 17 of the SFI 2015-2019 Standard. a) For a logging company or person to be considered trained the logging company or person must have completed the SFI State Implementation Committee approved state or provincial logger-training program. b) All Components of a training program could take several years to carry out, determining the point at which a logging company or person is considered a qualified logging professional should be based on the logging company or person's commitment to the program. This is, if a logging company or person completes all the components or modules offered in a given year, that logging company or person should be considered as a qualified logging professional. If all available components or modules are not completed, the logging company or person is no longer consider trained until all available components are completed.	2	Task Group has reviewed the comment and believes that the revised definition for *qualified logging professional* addresses the comment.	Refer to Section 13 – Definitions

	The proposed definition loses a key word – Responsibility. While we agree that responsibility should be a QLP, we are concerned that this definition begins to dictate, too specifically, how a logging company organizes the hierarchy of its crew. Practically speaking, someone not tied to a production-oriented job on a logging site is better suited to provide guidance to a crew. Someone tied to daily production may not be able to visit the many activities of a logging job. To do so would require stopping work. This could cause production slowdowns throughout the logging job. Generally, loggers are paid on production. Too adversely impact the financial wellbeing of the business would be irresponsible.	The current definition includes a vital component – responsibility. Since the definition allows for an individual who has some flexibility in their work schedule, as opposed to someone who may have vital production responsibility as a 'member of the crew', oversight of a logging job is more effective. Oversight of the logging job is the key component to assure a logging job conforms with SFI Standards. Furthermore, proposed definition may compromise a delicate balance that SFI Participants must maintain; a clear separation of employee/employer relationship. Contractually, SFI Participants cannot govern how the logging crew organizes responsibility of day-to-day logging activities. Finally, by adding language that the 'person' has a vested interest in the company the definition can better identify the connection of responsibility for the logging company. SFI guidance documents suggest this already. Working it into the definition is logical.	qualified logging professional: A person, with a vested interest in the company as a Principle or Employee, with specialized skills in timber harvesting gained through experience or formal training who has successfully completed wood producer training programs and continuing education requirements recognized by SFI Implementation Committees as meeting the spirit and intent of performance measure under Objective 17 of the SFI 2015-2019 Standard. a. For a logging crew to be considered trained, each crew must operate under the direction of an individual, with oversight responsibility, who has completed the SFI Implementation Committee approved state or provincial logger training program. b. All of the components of a training program could take several years to carry out, determining the point at which a logger is considered a qualified logging professional should be based on the individual's commitment to the program. That is, if a logger completes all the components or modules offered in a given year, that logger should be considered as a qualified logging professional. If all available components or modules are not completed, then the logger is no longer considered trained until all available components are completed.	2	Task Group has reviewed the comment and believes that the revised definition for *qualified logging professional* and the corresponding guidance addresses the comment.	Refer to Section 6 – Guidance and Section 13 – Definition.
	This new proposed Definition of a qualified logging professional should not be placed in this new Standard.	This will be very difficult as who will be on-site all of the time, how do you train a loader, skidder feller buncher operator BMP's, and how does he flag the BMP's and run his equipment? And what happens if that one person is sick, or leaves the crew? If that crew continues to operate, they are not in compliance with the SFI Standard. Also, can anyone show where the existing definition has showed up in an audit as not being adequate for the audit?	Keep the 2010-2014 definition of a qualified logging professional.	2	The Task Group has reviewed the comment and is of the opinion that the revised definition of *qualified logging professional* strengthens the requirement.	Refer to Section 13 – Definition.
	Strongly support this revised definition and the inclusion of part a. related to requiring one QLP per crew. Without this language, the number of loggers attending and completing wood producer training courses will decline. This change emphasizes the need to ensure a logger training in the basics of sustainable forestry is an active part of the crew and increases the awareness of these issues in the logging community as a whole. It would be inappropriate to allow one individual to be a QLP responsible for multiple crews operating on multiple sites.			3	Comment is supportive of the proposed revision to the *qualified logging professional* definition.	Refer to Section 13 – Definition.

[redacted]	There is no need to change the definition of QLP.	LP has adopted, implemented and closely monitored QLPs since the current definition became a part of the Standard, and has found it to not only provide sufficient oversight on each logging crew, but has provided the loggers the operational flexibility they need. LP feels that this proposed change would not make a measureable difference in the overall performance of our wood producers. Also, purchase from marketing board or unions in Quebec, so we do not know whether wood coming from unions or boards come from qualified logging professionals – so in Nova Scotia and in Quebec we would not meet this requirement.	Maintain the 2010 - 2014 definition of QLP	2	The Task Group has reviewed the comment and is of the opinion that the revised definition of *qualified logging professional* strengthens the requirement.	Refer to Section 13 – Definition.
[redacted]	The website's redline version of the draft under "a." is different from that above. The redline version read "...that is on-site working...." In certain regional logging, the feller part of the crew could be working a job a couple of weeks ahead of the yarding side. And too, once yarded, the hauling could still be ongoing weeks after other machinery has moved onto another job. If "on-site" is really in the draft, does this mean that there must be a trained logging professional working on-site in each part of the crew that is temporarily working independently from the whole?			2	Task Group has reviewed the comment and believes that the revised definition for *qualified logging professional* and the corresponding guidance addresses the comment.	Refer to Section 6 – Guidance and Section 13 – Definition.
[redacted]	The intent of the proposed definition appears to require that each crew have a qualified logging professional (QLP) associated with it that serves in a supervisory role. We support the intent of the proposed definition. However, we understand that confusion and/or opposition exists and therefore we recommend that the definition be revised without modifying the intent. We also recommend that relevant language from the existing interpretation (November 2010) be incorporated into the definition.	The phrase "working as a member of the crew" appears to be causing confusion or concern by some Program Participants. The confusion appears to stem from the perception that the QLP would have to be on-site all the time, i.e., 24/7 and/or that the QLP would have to be a regular working member of the crew, instead of someone that is regularly supervising the crew.	Modify (a) to read: For a logging crew to be considered trained, each crew must operate under the direction of a qualified logging professional who (1) has completed the SFI Implementation Committee approved state or provincial logger training program; (2) is an owner of, employee of, or directly employed by the wood producer, (3) has direct, on-site responsibility for a maximum of one site or crew at a time, and (4) is on site regularly to consistently carry out the roles and responsibilities of the qualified logging professional under the SFI Standard (e.g. safety, protection of soils, streams and other water bodies).	2	Task Group has reviewed the comment and believes that the revised definition for *qualified logging professional* and the corresponding guidance addresses the comment.	Refer to Section 6 – Guidance and Section 13 – Definition.
[redacted]	(a.) Question regarding if the qualified logging professional on site needs to be the supervisor (crew must operate under the direction of) or if it could be a crew member who is trained and has delegated responsibility. (b.) Each year there may be several optional training offerings that a logger may elect to take for self-improvement but are not necessarily mandatory.	(a.) Requirement needs to be flexible to address the many various crew organizational structures. (b.) Establish a distinction between optional and required.	(a.) "....each crew must be represented by a qualified logging professional that is on-site working as a member of the crew ....." (b.) "This is, if a logger completes all the required components or modules offered in a given year ..."	2	Task Group has reviewed the comment and believes that the revised definition for *qualified logging professional* and the corresponding guidance addresses the comment.	Refer to Section 6 – Guidance and Section 13 – Definition.
[redacted]	The current definition is appropriate and should not be changed. It is not realistic to expect that every crew is directed on-site by a trained logger. This is impossible to audit.		Use existing definition	2	The Task Group has reviewed the comment and is of the opinion that the revised definition of *qualified logging professional* strengthens the requirement.	Refer to Section 13 – Definition.

	Part A. should be worded as presented in this survey. This differs from the language provided in the redline version of the revisions and section 13 of the draft revisions which both read: "under the direction of a qualified logging professional that is on-site working as a member of the crew" - the key difference is "on-site"	The additional explicit "on-site" wording implies that the qualified logging professional on that crew MUST be on-site to be considered a trained crew. Would this imply that if that person left for the afternoon- harvest should be suspended? The intent is to have a qualified logger there on a regular/recurring basis.	Utilize the language provided in this survey: "each crew must operate under the direction of a qualified logging professional, that is working as a member of the crew, who has completed the SFI Implementation Committee approved state or provincial logger training program." Working as a member of the crew implies that they are always or regularly on-site but does not as explicitly imply that they ALWAYS need to be on-site.	2	Task Group has reviewed the comment and believes that the revised definition for *qualified logging professional* and the corresponding guidance addresses the comment.	Refer to Section 6 – Guidance and Section 13 – Definition.
	Strongly support this revised definition and the inclusion of part a. related to requiring one QLP per crew. Without this language, the number of loggers attending and completing wood producer training courses will decline. This change emphasizes the need to ensure a logger training in the basics of sustainable forestry is an active part of the crew and increases the awareness of these issues in the logging community as a whole. It would be inappropriate to allow one individual to be a QLP responsible for multiple crews operating on multiple sites.	NA	NA	2	Task Group has reviewed the comment and believes that the revised definition for *qualified logging professional* and the corresponding guidance addresses the comment.	Refer to Section 6 – Guidance and Section 13 – Definition.
	Earlier drafts of this definition included language suggesting that the qualified logging professional be on site. The language above has removed the "on site" language, which is an improvement, but it still provides that the qualified logging professional must be "working as a member of the crew." This is acceptable if it is understood that many logging supervisors or foremen who serve as qualified logging professionals have responsibility for more than one side and are working as part of more than one crew on more than one site in a given day. It would be more appropriate to remove the "member of the crew" language and instead clarify that each crew is subject to the direct supervision of qualified logging professional who is working in the field.	It would be too onerous and inefficient to require each logging crew to have its own, exclusive qualified logging professional when the same result can be achieved with a qualified logging professional who supervises and directs more than one crew in a given day.	Please amend subsection "a" to read: For a logging crew to be considered trained, each crew must operate under the direction of a qualified logging professional who has completed the SFI Implementation Committee approved state or provincial logger training program.	2	Task Group has reviewed the comment and believes that the revised definition for *qualified logging professional* and the corresponding guidance addresses the comment.	Refer to Section 6 – Guidance and Section 13 – Definition.
	Change definition of QLP to: Qualified Logging Professional: A logging company with specialized equipment for timber harvesting, or person with specialized skills in timber harvesting gained through experience or formal training, who has successfully completed wood producer training programs and continuing education requirements recognized by the SFI state implementation committee as meeting the spirit and intent of the performance measure under Objective 17 of the SFI 2015-2019 Standard. a) For a logging company or person to be considered trained the logging company or person must have completed the SFI State Implementation Committee approved state or provincial logger-training program. b) All Components of a training program could take several years to carry out, determining the point at which a logging company or person is considered a qualified logging professional should be based on SFI State Implementation Committee approved state or provincial logger-training program.			2	Task Group has reviewed the comment and believes that the revised definition for *qualified logging professional* and the corresponding guidance addresses the comment.	Refer to Section 6 – Guidance and Section 13 – Definition.
	Bullet point a above: This wording is different than the wording in the material presented at the workshops that includes "operate under the direction of a qualified logging professional that is on-site working as a member of the crew..." We should not require the QLP to be on-site or have language that infers the QLP will be on-site.	We are experiencing a shortage of loggers in the West. Especially in the Northwest, we have very good forest practices laws, A QLP that is in a supervisory role, responsible for the individual logging jobs is sufficient. This allows for a QLP to manage or supervise more than one job at a time while still providing the supervision necessary for bmp compliance.	For a logging crew to be considered trained, each crew must operate under the supervision of a qualified logging professional, that has responsibility for the job, who has completed the SFI Implementation Committee approved state or provincial logger training program.	2	Task Group has reviewed the comment and believes that the revised definition for *qualified logging professional* and the corresponding guidance addresses the comment.	Refer to Section 6 – Guidance and Section 13 – Definition.

	we propose to change the definition of a trained crew to require “a qualified logging professional that is on-site working as a member of a crew.” While well intended, this proposed change does not consider the processes and working nature of many Idaho logging operations. Numerous Idaho logging professionals operate many crews or sides on a single job. It is not uncommon on some operations to have three or four different crews on a single job and an operator to have three or four jobs going at a single time. In addition many crews may be separated for a time between jobs: A feller- buncher operator may be working on a new job while the skidder and processor operators are finishing the old one. Sawyers may be starting a new job two to three weeks in advance of a yarder and its crew. This proposed change, in our opinion, leaves too much open to the interpretation and discretion of an auditor and will not result in significant additional supervision or crew guidance. If taken literally, this proposed change would require most crew members to have Pro-Logger Certification. This is not feasible for most Idaho logging contractors. Currently, logging contractors in Idaho have numerous key personnel that are Pro-Logger Certified. One of their major responsibilities is to provide the guidance, supervision and monitoring required for compliance with the Idaho Forest Practices Act, Best Management Practices and SFI Objectives. While not present at all times they regularly visit the crews and, in this age of cellular technology, have the ability to be in quick contact if required. This method of crew supervision has been quite successful. In 2012 the State of Idaho conducted 1310 Forest Practice Inspections with 96% being in compliance. Compliance rates for 2011 were 97%. (2012 Idaho Forest Practices Year-End Report)			2	Task Group has reviewed the comment and believes that the revised definition for *qualified logging professional* and the corresponding guidance addresses the comment.	Refer to Section 6 – Guidance and Section 13 – Definition.
	The SFI Standard must differentiate between fiber harvested by certified logging professionals and fiber harvested by qualified logging professionals. We recommend that a framework be developed that would include the fiber harvested by certified logging professionals from small (<100 acre) family forests as certified fiber. SFI should strengthen the criteria for what constitutes a credible "certified logging professional program" to help address the inconsistency, nationally, with the use of this term. We believe if the SFI Standard doesn't make additional revisions to provide real value in differentiating between qualified logging professionals and certified logging professionals, certified logging professional programs are unlikely to grow and many may dissolve. Failure to significantly address this issue during this revision cycle opens the door for other certification programs to be a leader in this area. We encourage the SFI Program to provide the leadership and continuous improvement in this area by fully recognizing the benefits of Master Logger Programs to small family forest owners.			2	Comment is looking for SFI Inc. / SFI program to develop additional incentives for a small, non-certified landowner to select a Certified Logging Professional. Selection of CLP vs. QLP has been is a voluntary choice. The Task Group is of the opinion that the case for *certified logging professionals* must be made by respective *SFI Implementation Committees* and not something that the SFI program can drive. SFI cannot incent the use of CLPs over QLP as this is an individual business decision made by the program participant.	None

	Under the SFI standard, a forest landowner or production facility receives certification as a company and is subject to subsequent audits to ensure achievement of the SFI standard, rather than placing specific requirements on individual employees. As a parallel situation, Seneca Jones Timber Company contracts its forest management work with independent contractors who hire employees. The independent contractor at a company level is a Qualified Logging Professional. While we can direct our own employees and maintain training records, as a company we are legally limited on the specific direction and involvement we can provide an independent contractor in the conduct of their business practices. As a stark contrast, it seems inappropriate to hold our independent contractors to an individualized level requirement, which is beyond the level we hold ourselves to as SFI participants, as illustrated below: (Company directly under SFI Program Participant vs. Company and Employees under Qualified Logging Professional). The SFI standards must maintain a clear distinction that only the SFI participant is subject to providing evidence of conformance. In Oregon, our SFI State Implementation Committee closely coordinates with the Oregon Professional Logger Program to ensure that independent logging contractors receive adequate training to become Qualified Logging Professionals. A database is also available to ensure that SFI participants recognize which independent logging companies are committed to these standards, making the investment of time necessary to complete their understanding of best management practices. We understand that each State may have a unique way of addressing logger training and recommend that the local State Implementation Committee set appropriate requirements to comply with these standards on an individualized state level		QUALIFIED LOGGING PROFESSIONAL: A logging company with specialized equipment for timber harvesting or person with specialized skills in timber harvesting gained through experience or formal training who has successfully completed wood producer training programs and continuing education requirements recognized by SFI implementation committees as meeting the spirit and intent of the performance measure under Objective 17 of the SFI 2015-2019 Standard. a) For a logging company or person to be considered trained the logging company or person must have completed the SFI State Implementation Committee approved state or provincial logger training program. b) All Components of a training program could take several years to carry out, determining the point at which a logging company or person 1s considered a qualified logging professional should be based on the logging company or person's commitment to the program. This is, if a logging company or person completes all the components or modules offered in a given year, that logging company or person shall be considered as a qualified logging professional. If all available components or modules are not completed, the logging company or person is no longer consider trained until all available components are completed.	2	Task Group has reviewed the comment and believes that the revised definition for *qualified logging professional* and the corresponding guidance addresses the comment.	Refer to Section 6 – Guidance and Section 13 – Definition.
	Needs clarification and to be more specific.	Clarification	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 as having met the criteria in 16.2, where is defines the components of a credible logger certification program	2	Task Group believes that the revised definition for certified logging professional addresses the comment.	Refer to Section 13 – Definitions
	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	Task Group has reviewed the comment and believes that the criteria outlined in Indicator 17.3 (certified logging program) are clear. Regarding the comment to incent the use of *certified logging professionals* the task group believes that the case for certified logging professionals must be made by respective SFI Implementation Committees and not something that the SFI program can drive.	Refer to Section 6 – Guidance and Section 13 – Definition.

	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	The Task Group has reviewed the comment and is of the opinion that the revised definition of a *qualified logging professional* addresses the comment.	Refer to Section 13 – Definitions.
	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 has reviewed the comment and believes that the revised definition of *qualified logging professional* addresses the comment.	Refer to Section 13 - Definitions
	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 has reviewed the comment and believes that the revised definition of *qualified logging professional* addresses the comment.	Refer to Section 13 - Definitions

qualified resource professional: A person who by training and experience can make forest management recommendations. Examples include foresters, soil scientists, hydrologists, forest engineers, forest ecologists, fishery and *wildlife* biologists or technically trained specialists in such fields.

	Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language

No definition of what a "forester" is.	Many states do not have licensing or registration to indicate a "forester". Some areas of USA anyone can call themselves a forester.	Include a forester definition under the "definition " section.	2	The Task Group has reviewed the comment but believes the current definition of *qualified resource professional* is continues to be credible and does not require an additional definition for "forester".	Refer to Section 13 - Definitions

recycled content: recycled content is defined as pre-consumer recycled content and post-consumer recycled content.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
Is this consistent with Federal Trade Commission (FTC) green guides? Ensure consistency with FTC green guides			3	Yes – definition aligns with Federal Trade Committee requirements.	Refer to Section 13 - Definitions
The American Forest & Paper Association (AF&PA) supports the revised SFI definition of "recycled content" as pre-consumer content and post-consumer content.	AF&PA agrees that pre-consumer content should be valued equally as post-consumer content since they provide equivalent environmental benefits and economic value for papermakers who use them as best meets customer needs in terms of product quality, cost, functionality and performance.		2	Supportive of the inclusion of pre-consumer content in the revised definition of recycled in *certified content*.	Refer to Section 13 – Definition

reforestation: The reestablishment of forest cover either naturally or by seeding or *planting* of seedlings.

riparian area: transition zone characterized by vegetation or geomorphology adjacent to rivers, streams, lakes, wetlands, and other water bodies.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
Indicator 3.2.1 requires protection of riparian areas during management. The proposed SFI definition of a riparian area now extends to wetlands. The generally accepted definition of a riparian area does not extend to all wetland communities, but is generally restricted to rivers, lakes, streams, and open water wetland communities. Ponds could be listed as an example of 'other water bodies'.	BMP guidelines for riparian area typically specify buffer zones/area where management may be restricted or limited to frozen ground conditions adjacent to water bodies, but do not address buffers for all wetlands types, only for open water wetland communities. The definition for riparian areas is thus inconsistent with many state BMP guidelines.	riparian area: transition zone characterized by vegetation or geomorphology adjacent to rivers, streams, lakes, open water wetlands, and other water bodies (such as ponds).	2	The Task Group has reviewed the comment but believes that the proposed definition for *riparian area* which includes *wetlands* (itself a defined term) addresses the comment.	Refer to Section 13 – Definition

SFI certification: A systematic and documented verification process to obtain and evaluate evidence *objectively* to determine whether a *Certified Program Participant*'s *SFI* program conforms to the *SFI 2015-2019 Standard*.

SFI Implementation Committee (SIC): A state, provincial, or regional committee organized by *SFI Certified Program Participants* to facilitate or manage the *programs* and alliances that support the growth of the *SFI* program, including sustainable forest management.

silviculture: The art and science of controlling the establishment, growth, composition, health, and quality of forests and woodlands to meet the diverse needs and values of landowners and society on a sustainable basis.

skid trail: A temporary path through the woods to transport felled trees or logs to a collection area for further transportation.

special sites: Sites that include ecologically or geologically unique or *culturally important* features.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
Special sites means historical, etc., and ecological is now in Obj 4.	Remove "ecologically" in definition of special sites in alignment to change to objective 6		1	Edit made.	None
Remove/delete reference to "ecologically" important features. Objective 6 and it's related indicators were appropriately changed to focus specifically on only the geological and culturally important features. The definition needs to be changed to be consistent to reflect this decision.	Remove/delete reference to "ecologically" important features. Objective 6 and it's related indicators were appropriately changed to focus specifically on only the geological and culturally important features. The definition needs to be changed to be consistent to reflect this decision.	Delete "ecologically or" prior to "geologically ..."	1	Edit made.	None
Delete "ecologically" from the definition to be consistent with moving to the new Objective 4			1	Edit made.	None

stand: A contiguous group of trees sufficiently uniform in age, composition, and structure, and growing on a site of sufficiently uniform quality, to be a distinguishable unit.
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.
Sustainable Forestry Initiative Inc.: *SFI Inc.* is a 501c(3) non-profit charitable organization, and is solely responsible for maintaining, overseeing and improving the Sustainable Forestry Initiative *program*. *SFI Inc.* directs all elements of the Sustainable Forestry Initiative *program* including the *SFI Standard*, chain-of-custody certification, *fiber sourcing* requirements, labeling and marketing. SFI Inc. is overseen by a three-chamber board of directors representing social, environmental and economic sectors.

Sustainable Forestry Initiative 2015-2019 Standard (SFI Standard): The *principles, policies, objectives, performance measures,* and *indicators* that detail specific requirements for *Certified Program Participants.* The *SFI 2015-2019 Standard* is the fourth revised standard since 1998.

Sustainable Forestry Initiative Standard Audit Procedures and Auditor Qualifications and Accreditation: The *principles* and guidelines that detail specific requirements to *Program Participants* and *Certification bodies* for conducting audits to the *SFI 2010-2014 Standard*.

technical expert: A person who provides specific knowledge or expertise to the *audit team* (ISO 19011 2002, 3.10).

third-party certification: An assessment of conformance to the *SFI 2015-2019 Standard* conducted according to the standards of the *SFI Audit Procedures and Qualifications* and ISO 19011 by a qualified *certification body*.

threatened and endangered: Listed under The U.S. Endangered Species Act or The Canadian Species at Risk Act and listed under applicable state or provincial laws requiring *protection*.

traditional forest-related knowledge: Forest-related knowledge owned and maintained by indigenous peoples as a result of their traditional use of or tenure on forestland.

varietal seedlings: Genetically identical individuals produced through vegetative reproduction methods, such as micropropogation, tissue culture or somatic embryogenesis.

vernal pool: a seasonal wetland with sufficient water present during amphibian breeding season, absence of fish, and presence of wetland obligate fauna.

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
There could be a timing consideration with this definition. Is this an every year occurrence or would it apply to a pool that presents itself every few years.	Allow for longer periods to be ecologically valid. Vernal pools can vary by geographical regions.	"a decadal consistent wetland with....."	2	The Task Group has reviewed the comment but believes that the proposed definition for vernal pool is effective a written.	Refer to Section 13 – Definition
another attribute is that it does not have an inlet or an outlet.			2	The Task Group has reviewed the comment but believes that the proposed definition for vernal pool is effective a written.	Refer to Section 13 – Definition

wetland: (1) seasonally or permanently water-logged areas characterized by vegetation adapted for life in saturated /flooded conditions; (2) wetlands can be treed, shrubby or open and include bogs, fens, swamps, marshes and shallow open water areas; (3) wetlands may be stagnant systems (e.g. bogs), slow flowing (e.g. fens, swamps) or have fluctuating water levels (e.g. marshes, shallow open water).

Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
Is it a forest product? Is it considered in conversion or not?	Consider implications to definitions of conversion and wetlands		2	Addressed in comments in SFI 2015-2019 Section 2 -Objective 3.	Refer to Section 13 – Definition
this definition should exclude forested wetlands that are managed for the purpose of timber production	The intention of wetlands regulation seems first and foremost to protect such areas as coastal areas from conversion to non-forest activity, it would be beneficial to segregate that type of occurrence.		2	The Task Group believes that the proposed definition of *wetland* should not be problematic for the management of forested *wetlands*.	Refer to Section 13 – Definitions.
Current definition should include the soil component.	All three components: hydrology (e.g., water present at some time of the year), hydrophytes (obligatory or facultative plants present), and hydric soils should be recognized. An area can be seasonally inundated with water and even have a few facultative wetland plant species, but if the soil type is not "hydric" then it must be argued it does not classify as a wetland.	Wetland definition should follow that of the US Army Corps of Engineers and the US EPA: Those areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas.	2	The Task Group has reviewed the comment but believes that a definition that aligns more closely with the definition of *wetlands* used in the Clean Water Act is better suited to SFI.	Refer to Section 13 – Definitions.

	include mention of peat land as a type of wetland	Aligns language with EU Renewable Energy Directive. This would eliminate a lot of uncertainty by EU customers and legislators that the SFI forest management standard applies to peat lands, which are explicitly mentioned in the RED	Add peat land as one example of wetlands	2	The Task Group believes that the proposed definition of *wetland* would account for peat bogs.	Refer to Section 13 – Definitions.

visual quality: The seen aspects of both the land and the activities that occur upon it.

Visual quality management: Minimization of the adverse visual effects of forest management activities.

wildlife: Aquatic (marine and freshwater) and terrestrial fauna.

wood and fiber supply area: The geographic area from which a *Certified Program Participant* procures, over time, most of its wood and fiber from *wood producers*.

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.

	Comment	Rationale for proposed change	Proposed new language	Comment Review	Rationale	Revised or Proposed New language
	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	Task Group has reviewed the comment and is of the opinion that the current definition of *wood producer* continue to be effective as written.	Refer to Section 13 - Definitions

[redacted]	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 make claims like, "These materials come from a process that is certified to meet SFI responsible fiber sourcing requirements."	3	Items noted in the comment will be addressed when the Fiber Sourcing requirements are moved into a separate standard.	Refer to SFI 2015-2019 Fiber Sourcing Standard

Use this space to propose any removals or additions:

	Comment	Comment Review	Rationale	Revised or Proposed New language
[redacted]	Comment / Rationale: If QLP definition does not change then LP is already in line with a de minimis 5% limit on deliveries from untrained loggers, and has no problems with it. Proposal: If the definition of QLP changes as proposed, then the de minimis limit needs to be higher. Under the proposed QLP definition, we propose no specific limit. If a limit must be set, then we recommend 10%.	2	Task Group has reviewed the comment and believes that the revised definition for *qualified logging professional* addresses the comment.	Refer to Section 13 – Definitions
[redacted]	1. We would like to suggest that a definition of "Indigenous Peoples" be added to Section 13 of the standard. The standard should avoid placing the landowner in the position of determining who is and who is not a member of an indigenous peoples group. The following are two definitions that could be used to arrive at a definition to be included in the standard. The first is adapted from Article 1 of ILO Convention No. 169 and the second is from the UN Convention: Indigenous Peoples: Federally recognized tribal peoples in independent countries whose social, cultural and economic conditions distinguish them from other sections of the national community and whose status is regulated wholly or partially by their own customs or traditions or by special laws or regulations." Indigenous Peoples: There is no universally accepted definition of "Indigenous Peoples." The International Finance Corporation uses the term to refer to a distinct social and cultural group possessing in varying degrees the characteristics of 1) self identification as members of a distinct indigenous cultural group and recognition of this identity by others; 2) collective attachment to geographically distinct habitats or ancestral territories and to the natural resources in these habitats and territories; 3) customary cultural, economic, social, or political institutions that are separate from those of the dominant society or culture; and 4) an indigenous language. International Finance Corporation, Indigenous Peoples, Guidance Note 7, at 2-3 (April 30, 2006). 2. We would like to suggest that the definition of "Illegal Logging" be removed and replaced with a definition of "Illegal Timber." The definition proposed below is from the draft ANSI Standard for Due Diligence in Procuring/Sourcing Legal Timber (ANSI LTDD 1.0 2014): Illegal Timber: Timber that is logged, harvested or traded in violation of applicable statutes, regulations, binding administrative directives in force in the country of harvest at the time of harvest which are required by national due diligence schemes to demonstrate legal harvest.	2	1. The Task Group has proposed a definition for *Indigenous Peoples* that reflects those Tribes/First Nations that are federally recognized by the United States and Canadian governments respectively. 2. Task Group believes that the revised definition of *illegal logging* addresses the comment.	Refer to Section 13 - Definitions

Addition needed: How will SFI define "Indigenous Peoples"? Only Federally recognized Native American tribes? Or a more open definition such as the one found on the following website www.firstpeoples.org: DEFINING INDIGENOUS PEOPLES There is no rigid definition of what makes a group Indigenous, but the United Nations and the International Labour Organization have outlined a few characteristics that usually define an Indigenous group: ● We are descended from the pre-colonial/pre-invasion inhabitants of our region. ● We maintain a close tie to our land in both our cultural and economic practices. ● We suffer from economic and political marginalization as a minority group. ● A group is considered Indigenous if it defines itself that way.	2	The Task Group has proposed a definition for Indigenous Peoples that reflects those Tribes/First Nations that are federally recognized by the United States and Canadian governments respectively.	Refer to Section 13 - Definitions
Add definition for "short rotation woody crop" to address Section one which excludes such areas from the scope of SFI certification.	2	Task Group has reviewed the comment The need to define the term short rotation woody crop is still under consideration.	Refer to SFI Section 6 – Guidance part 2 Application of the SFI 2015-2019 Forest Management Standard & the SFI 2015-2019 Fiber Sourcing Standard.
Add these definitions: Agroforestry - definition from the SAF Dictionary of forestry terms, 2008; referenced in comments about introduction and applicability of the SFI standard High grading - definition from the SAF Dictionary of forestry terms, 2008; referenced in comments about PM 1.3 Indigenous Peoples - for the USA means federally recognized tribes	2	Agroforestry: Task Group is of the opinion that to define a concept (agro-forestry) that is not within the scope of the SFI program would lead to confusion. High Grading: the concept of "high-grading" as commonly understood is not a responsible harvest practice and hence does not meet with the Principles of the SFI program. Therefore the term "high-grading" is not included in SFI program documents. Indigenous Peoples: See proposed definitions for Indigenous Peoples in Section 13 – Definitions.	Refer to Section 13 - Definitions
Add a definition for indigenous peoples and scope this down to federally and state recognized tribes/rights. Make this change in Objective 8 too.	2	The Task Group has proposed a definition for Indigenous Peoples that reflects those Tribes/First Nations that are federally recognized by the United States and Canadian governments respectively.	Refer to Section 13 - Definitions
Section 13 should include a definition of 'rare ecological community'. Inclusion of such a definition would help to alleviate ambiguity in the standard, specifically in the interpretation of Indicator 1.2.2. Rare ecological community (including plant community): Those ecological communities that have been identified by state or federal agencies, or natural heritage databases to be rare, consistent with the parameters for determining RTE species.	2	Task Group has reviewed the comment and is unclear why the comment has a reference to the interpretation for Indicator 1.2.2 as having language related to "rare ecological communities". This term is not used in the interpretation. The Task Group is of the opinion that the SFI requirements related to Forest with Exceptional Conservation Value (Objective 4) addresses the concept of rare, threatened and endangered species.	Refer to SFI 2015-2019 Forest Management Standard Performance Measure 1.2 & Objective 4.