

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

Notes: These are the actual comments submitted during the second public comment period (January 30th, 2009 – March 2nd, 2009) for the development of the 2010-2014 SFI Standard. Only names identifying the commenter, organization or individuals have been deleted (shown as:XXXXX).

Introduction

Sustainably managed forests provide many benefits to society. Managed forests make a vital contribution to the world by providing economic, environmental, and social benefits indispensable to the quality of life. A commitment to provide these social benefits extends to promoting human health and safety; providing employee training and education; protecting water quality, soil, and wildlife; protecting unique resources; and communicating the benefits of the practice of sustainable forestry to the general public. The SFI Standard reflects this commitment to social responsibility through its principles, objectives, performance measures, and indicators.

The SFI program was launched in 1994 as one of forest sector's contributions to the vision of sustainable development established by the 1992 United Nations Conference on Environment and Development (UNCED). It was developed with multi-stakeholder input including Environmental Non-Government Organizations (ENGOS), industry, scientists, academics, government agencies and professional organizations. 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, the environment, and future generations.

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, Canada on the sustainable development of temperate and boreal forest. 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. This working group soon became known as the "Montréal Process" and both the Canadian and US governments are signatories to the Montréal process. Other signatories include Argentina, Australia, Chile, China, Korea, Mexico, New Zealand and Russia. These 12 countries represent 90 percent of the world's temperate and boreal forests (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. Although the Montréal Process criteria and indicators are intended to track progress at a national level and provide an international reference for policy-makers, many of the criteria and indicators can be reinforced and supported at a local level and are therefore reflected in the SFI 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.
7. Legal, institutional and economic framework for forest conservation and sustainable management.

Rationale for proposed change:	Proposed New Language:
The introduction has been greatly expanded with good information.	We need to state that only the Objectives, Performance Measures, and Indicators are auditable.
Good background explanation -- no change proposed.	
It is important that confusion does not exist between language contained in the "Introduction" and language within the Standard itself. We believe that the Introduction is not "auditable", whereas the Principles, Objectives, Performance Measures, and Indicators are auditable.	Suggest preceding the Introduction with a header that reads "Sustainable Forestry Initiative (SFI) Program. See below for new header to the Principles section that calls for a header that reads "2010-2014 SFI Standard".
In reference to participants procuring wood "off-shore (beyond North America)", please clarify whether SFI is referring to sources outside only the US and Canada. Is Mexico considered off-shore?	Recommend clarifying that North America is US and Canada and does not include Mexico throughout the document.
The intro is great but it needs to be made very clear that the introduction can not be a part of the audit.	This introduction is not an auditable portion of the SFI Standard.
The Montreal Process criteria listed for # 6 and 7 do not match the updated criteria (see Annex F: Criteria and Indicators for the Conservation and Sustainable Management of Temperate and Boreal Forests... The Montreal Process. Third Edition, December 2007).	Criteria 6 and 7 should be revised in the SFI Standard to be consistent with the actual Montreal Process Criteria which currently state: 6. Maintenance and enhancement of long-term multiple socio-economic benefits to meet the needs of societies. 7. Legal, policy and institutional framework.
Language:	Recommendation - SFI Inc. should pursue every opportunity for simplification.

Concern –

A) The standard is generally wordy, often with duplicate language between the Objective; performance measures and indicators.

B) Duplicate language across objectives; EXAMPLE - repeated reference throughout to “individually or collaboratively” could perhaps be better addressed in a blanket statement in the introduction. The introduction could make it clear that cooperative initiatives are encouraged by including something to the effect “active collaboration with outside agencies is encouraged and promoted as participants strive to demonstrate how they have addressed specific requirements of this standard”. It is up to the participant to demonstrate how they have addressed the intent of the standard and what evidence they have either independently or in cooperation with others.

C) General tendency throughout the standard to refer to operations as “harvest” operations - more appropriate term may be “forest operations” which tends to capture road work, harvest, silviculture, tending.

Recommendation - SFI Inc. should pursue every opportunity for simplification.

Recertification cycle:

Concern - SFI Audit Procedures and Qualifications (SFI APQ) states that recertification is needed every 3 years.

Recommendation - We recommend maintaining a 5 year recertification cycle with retention of annual surveillance audits for a Continuous Certification option. A 5 year cycle is more conducive to demonstration of forest management procedures and can (and should) be synchronized with the current 5-year Standard Review cycle.

Reorganization of the Principles, Objectives, Performance Measures and

Recommendation - We recommend maintaining a 5 year recertification cycle with retention of annual surveillance audits for a Continuous Certification option. A 5 year cycle is more conducive to demonstration of forest management procedures and can (and should) be synchronized with the current 5-year Standard Review cycle.

<p>Indicators:</p> <p>The shuffling of the Objectives, Performance Measures and Indicators is disruptive to the development and continuous improvement of individual program systems. The result is having to completely reorganize number and cross-reference the participant's system.</p> <p>Develop a method by which additions and changes to the Standard in such a way as to allow participants' programs to build upon their existing system. This would promote continuous improvement and allow individual programs to continue to excel rather than essentially starting over every five (or three) years.</p> <p>Concern: It is unclear if participants still have the ability to have continuous certification over the 3 year time frame.</p> <p>Recommendation: Continuous recertification over the 5 (or 3) year cycle audits should be retained.</p>	
<p>It's important that confusion does not exist between language contained in the "Introduction" and language within the Standard itself.</p>	<p>Specify the purpose of the introduction as well as (and more importantly) that the introduction is not an auditable part of the standard.</p>
<p>The Table of Contents section heading "Fiber Sourcing Objectives" does not match the label on page 22, Objectives for Procurement. Also the section heading "Land Management and Fiber Sourcing Objectives" does not match page 25, Objectives for Forest Management and Procurement. These headings should be consistent, and particular attention should be paid to whether the Standard uses the term "fiber sourcing" or "procurement." In business, there is not much difference between them conceptually, but if public perception is considered, "fiber sourcing" may carry more meaning. To avoid confusion, we recommend that only one of the terms -- "fiber sourcing" or "procurement" -- be defined and used appropriately.</p>	

Contradictory 'Introduction' narrative/implications may result in conflicts between Objectives and the Introduction.	Add a statement that affirms the 'Introduction' is not auditable narrative.
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Global Recognition

The SFI Program has progressed steadily into a globally recognized North American 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.

In December of 2005, the Programme for the Endorsement of Forest Certification schemes (PEFC) announced it endorsed the SFI Standard and appointed the Sustainable Forestry Board to be the PEFC-US governing body. PEFC sets minimum benchmarks for national forest certification systems worldwide and endorsement schemes that meet or exceed those requirements. PEFC endorsement of the SFI Standard brings greater recognition to the SFI internationally and enhanced marketing opportunities for SFI Program Participants in numerous countries in Europe and Asia and throughout the world (www.pefc.org).

The SFI Standard is applied to larger forest operations, and SFI Inc. recognizes the American Tree Farm System®(www.treefarmssystem.org) as the non-industrial landowner certification program in the U.S., encompassing thousands of family forest owners. The American Tree Farm System has also been endorsed by the PEFC.

Rationale for proposed change:	Proposed New Language:
This section should recognize that SFI follows the ISO standard and the audit protocols are established on an international basis.	SFI follows the ISO international standards and requires certified ISO trained auditors to conduct the verification process.
I'm not sure as to why SFI Inc. is promoting the American Tree Farm System certification and not other certifications (i.e. Pan-Canadian Woodlot Program). If only 10% of the world's forests are certified, then why is SFI Inc. only choosing	Add recognition to developing certification programs in Canada such as the Pan-Canadian Woodlot Program.

<p>to promote 1 brand of non-industrial landowner certification. FSC also has a certification program for small non-industrial landowners; however I realize that SFI Inc. is in competition with FSC. I would think that SFI Inc. would want to be very cautious about promoting other certifications.</p>	
<p>This section should recognize that SFI follows the ISO standard and the audit protocols are established on an international basis.</p>	<p>SFI follows the ISO international standards and requires certified ISO trained auditors to conduct the verification process.</p>
<p>Good Section.</p>	

SFI Governance and Stakeholder Involvement

The SFI program is operated by SFI Inc. which is a fully independent non-profit charitable 501(c)(3) organization. SFI Inc. is governed by its 18-member board of directors made up of three chambers with equal representation: 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 the SFI Standard and all aspects of the SFI program, including the SFI Standard, chain of custody, labeling and claims as well as marketing and promotion.

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

Thirty-seven SFI Implementation Committees (SICs) 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, SICs promote logger training programs to reach the thousands of independent contractors that are the key to the quality of forest harvesting operations.

Rationale for proposed change:	Proposed New Language:
	Question regarding decision making - Do all three chambers have to be in majority agreement to measures?
Appropriate mention of External Review Panel - no change proposed	
This section should recognize both logger and resource professional training requirements.	SICs promote resource staff and logger training programs in an effort to reach out to thousands of landowners and independent contractors that are the key to the quality of forest harvesting operations.
This section should recognize both logger and resource professional training requirements.	SICs promote resource staff and logger training programs in an effort to reach out to thousands of landowners and independent contractors that are the key to the quality of forest harvesting operations.
Just about all forest management work is done by contractors; rather than just "harvesting," as implied as written.	Last sentence: ...key to the quality of forest management and harvesting operations.
non-timber forest products and stakeholder groups seem to be excluded from most objectives. For instance, recreationists are identified only sparingly (and only as examples), as are private landowners (i.e., non-woodlot or forestry related ownership) and yet they represent some of the major conflict groups with forestry operators. Some objectives provide for their input or comment (e.g. 2.2) but none of the land management objectives consider co-management or input from these groups in the decision-making process. There doesn't seem to be a natural fit with the listed indicators, except to include sensitivity towards their inclusion.	

Conservation Support

SFI has the support of conservation groups who recognize that SFI certification helps to protect wildlife habitat, biological diversity and other important forest values. Many of these conservation groups partner with SFI Inc. and SFI 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.

Rationale for proposed change:

Proposed New Language:

Public Involvement

Public involvement, communication and public reporting in the SFI program is welcomed and reflected in the SFI Standard under Objectives 17, 18 and 19. Program participants are required to support and promote mechanisms for public outreach, education and involvement related to forest management. In addition, on public lands, 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 also required to confer with affected indigenous peoples.

The SFI program also requires a 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 2010-2014 SFI Standard. These reports are publicly available on the SFI Inc. website (www.sfiprogram.org)

The public also has avenues to voice and have any concerns addressed related to the SFI program and its participants through SFI's open and transparent complaint process.

Rationale for proposed change:	Proposed New Language:

Requirements for Program Participants	
<p>SFI Program Participants must comply with all portions of the SFI 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 Standard requires 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 Standard. Program Participants are required to work with their suppliers to make sure they are meeting program goals for best management practices (BMPs). And Program Participants are 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.</p>	
Rationale for proposed change:	Proposed New Language:
Requirements for Use Of Trained Loggers, Use of BMP's, and Legal Compliance should be shared by both Procurement Only Organizations and Forest Landowners Only organizations. The standard should clearly reflect that these are requirements for all program participants. The Objectives need to be restructured so that proposed Objectives 9,10, and 14 apply to Landowners. A renumbering and arrangement will be necessary.	Rearrange the Objective numbering.
Concerns that the statement "... by encouraging others to adopt the principles and objectives of the SFI Standard" can be interpreted very broadly. As an organization we support several SFM standards and cannot endorse one	Link this statement more clearly to the following sentence regarding requirements for working with suppliers.

<p>standard over another.</p>	
<p>I would like to applaud the addition of this paragraph (and generally the whole introduction section to the revised standard) and the statement "taking into account their local conditions and circumstances and the scope and scale of their operations". Thank you!</p>	
<p>The Standard does not articulate that joining SFI, Inc. and participation in SICs is required. Language requiring the Application for Participation, and the requirements therein needs to be included.</p>	<p>SFI Program Participants must: 1) apply for and be accepted as a licensee in the SFI program; 2) comply with all portions of the SFI Standard relevant to . . . scope and scale of their operations; 3) participate personally and financially in the SFI Implementation Committee in the state(s) or provinces(s) in which the Program Participant operates; 4) pay the annual license fee. In addition, the SFI Standard</p>
<p>The 2010 Standard makes significant context and objectives changes, which will add considerable implementation cost to participants, wood suppliers and logger training organizations.</p>	<p>Add a statement that acknowledges the added 2010 Standard considerable implementation cost to participants, wood suppliers and logger training organizations.</p>
<p>Of concern is the current land development component of forest industry. Only one large integrated forest management company remains in the U.S. All of the rest have become TIMOs (Timber Investment Management Organizations) or REITs (Real Estate Investment Trusts). These may manage land holdings using forestry, but are actively selling lands, primarily for development purposes. A company should not be considered to practice sustainable forestry if it can sell any parcel it wants, with potentially severe impacts on wildlife or other levels of biodiversity, and is not held responsible for these impacts because they no longer own the land. Companies must be held accountable for the impacts to wildlife or biodiversity resulting from the sale of their lands for development. If such sales cause losses to wildlife or biodiversity, then the company, on its remaining lands, should not be considered to be practicing sustainable forestry.</p>	

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, with hundreds of program participants across North America. Program participants include private landowners, public landowners and managers, as well as conservation groups and universities.

The SFI Standard applies to the United States and Canada, where Program Participants must comply with numerous federal, provincial, state, and local laws that protect the environment, their workers, and those who live in the communities in which they operate. Such laws include hundreds of thousands of rules that cover a broad range of issues. Just some of the applicable federal, state, provincial, or local forestry-related environmental laws and regulations found in the United States and Canada include the Clean Water Act, Endangered Species Act, 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, antidiscrimination 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.

Given the comprehensiveness of the laws already in place in North America, the SFI Program does not try to duplicate sustainable forestry processes that are 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 a SFI Program Participant procures wood off-shore (beyond North America), the SFI Standard stipulates the need to avoid controversial sources of supply, including illegal logging of fiber from countries without effective social laws.

Rationale for proposed change:	Proposed New Language:
Comments – XXXXX is committed to the principles of responsible paper	

<p>sourcing and was the first global publisher to set out and disclose a global policy on this issue. It was updated in 2008. SFI is specifically named in the XXXXX policy as a standard it encourages. Welcomes the commitment of SFI to continuous improvement and in particular the three-chamber board of directors. Separations between SFI and the certified organization is important. Recognizes the opportunity that this consultation provides to further strengthen the standard. XXXXX is considering its strategy with regard to on-product labeling, however, consensus endorsements for all parties including ENGOs on the standards efficacy is an important factor. Would welcome dialogue between FSC and SFI to align the standards.</p>	
<p>Paragraphs 2 & 3 cover a topic that is a great source of misunderstanding in the international arena. Well done - no changes suggested.</p>	
<p>It sounds like FSC is moving toward one North American Standard. We should be careful about making statements that may not be true for the five year term.</p>	<p>SFI is currently the only single North American standard and is one of the largest and fastest growing certification standards in the world, with hundreds of program participants across North America. Program participants include private landowners, public landowners and managers, as well as conservation groups and universities.</p>
<p>I'm a little confused why we state we're the only single North American Standard, but then go on to state that it doesn't cover Mexico or Central America. What are we trying to state by saying "single North American"? Or does it still apply to Mexico/C.A. but they just don't have those laws?</p>	
<p>Unsure of what "single North American standard" means</p> <p>Hundreds of thousands of rules is overstated and not based on fact</p>	<p>(delete hundreds of) thousands of rules</p>

Responsible Fiber Sourcing

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

Today, 10 percent of the world's forests are certified and in North America, while large tracts of public and industrial forest lands are certified, less than 1 percent of family forest land is certified. While SFI Inc. encourages certification of lands owned by small family forest owners, it is also 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 – particularly in the case of those who own small acreages. In the United States, more than 10 million family forest owners account for 60 percent of the forestland and more than 50 percent of the raw material used by SFI Program Participants. In Canada, family forest owners in many regions provide a significant share of the raw materials used by SFI Program Participants. Yet, the lack of certification does not mean these forests are not well-managed.

In North America, SFI Program Participants who source fiber from uncertified lands, must engage in private landowner outreach and logger training and require their suppliers to use the services of qualified professionals and trained loggers, and adhere to best management practices that protect water quality on those uncertified lands. In addition, the 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 includes sampling for evidence of logger training, landowner outreach, reforestation, conformance with applicable laws and adherence to BMPs on uncertified lands as well as the other requirements set out in the SFI fiber sourcing objectives.

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. Supporting fiber sourcing is supporting family forest owners and their efforts to keep forests as forests while at the same time providing the market place with forest products from well-managed forests.

Rationale for proposed change:	Proposed New Language:
Since the term Responsible Fiber Sourcing is not in the definitions therefore, remove the word responsible (with procurement and sustainable) in the first	Through SFI's wood procurement requirements, the SFI program stands apart from other forest certification programs by supporting and promoting

<p>sentence. Since “on these lands” is not directly defined and because procurement encourages elements of sustainability beyond land management change the end of the sentence to reflect the full range of actions (practices) and scope (wood supply area) of influence by procurement participant operations.</p>	<p>sustainable forestry practices throughout the combined geographic reach of all the SFI program participant’s wood supply operations.</p>
<p>Responsible Fiber Sourcing should be defined in the definitions section</p>	<p>Add definition in definition section.</p>
<p>To emphasize the procurement, as well as land management aspects of the SFI standard</p>	<p>Through SFI's wood procurement/fiber sourcing requirements....on these lands, and responsible practices in all the SFI program participant's wood supply operations.</p>
<p>We are encouraged that this section recognizes that, “Today, 10 percent of the world’s forests are certified and in North America, while large tracts of public and industrial forest lands are certified, less than 1 percent of family forest land is certified. While SFI Inc. encourages certification of lands owned by small family forest owners, it is also 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 – particularly in the case of those who own small acreages. In the United States, more than 10 million family forest owners account for 60 percent of the forestland and more than 50 percent of the raw material used by SFI Program Participants. Today, 10 percent of the world’s forests are certified and in North America, while large tracts of public and industrial forest lands are certified, less than 1 percent of family forest land is certified. While SFI Inc. encourages certification of lands owned by small family forest owners, it is also 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 – particularly in the case of those who own small acreages. In the United States, more than 10 million family forest owners account for 60 percent of the forestland and more than 50 percent of the raw material used by SFI Program Participants”.</p> <p>However, Sustainable Forestry Initiative (SFI) needs to take this further. We</p>	<p>Sustainable Forestry Initiative (SFI) needs to take this further. We believe SFI should consider formal recognition between SFI and independent third party certified logger certification programs. Further, there should be a recognized difference between fiber sourced from family forestland by qualified logging professional and an independent third-party certified logging professional (e.g. Minnesota Certified Master Logger).</p> <p>Specifically, SFI should develop a template to assess logger certification programs against. See proposed performance measure 9.2</p>

<p>believe SFI should consider formal recognition between SFI and independent third party certified logger certification programs. Further, there should be a recognized difference between fiber sourced from family forestland by qualified logging professional and an independent third-party certified logging professional (e.g. Minnesota Certified Master Logger).</p> <p>Specifically, SFI should develop a template to assess logger certification programs against. See proposed performance measure 9.2</p>	
<p>The first sentence in the third paragraph introduces the requirement for Program Participants to require their suppliers to use the services of qualified professionals and trained loggers. This statement should be revised or removed as it is not always possible to procure wood from a supplier who is employing qualified professionals and trained loggers. We have procured wood from small landowners who are clearing a small portion of land for agricultural purposes, home building, etc. We also purchase wood from a large private landowner who is not certified and does not employ trained loggers. With the state of the forest industry and the economy, XXXXX would be hard pressed to convince this landowner of the requirement to provide training to loggers with 20+ years of experience.</p>	<p>Suggest using the word "encourage" vs. "require".</p>
<p>The language in this sentence is inconsistent with the language in Objective 9. Objective 9 states, "To broaden the practice of sustainable forestry by encouraging forest landowners to utilize the services of forest management and harvesting professional". This objective uses the word "encourage", while the sentence under Responsible Fiber Sourcing in the introduction uses the word "require".</p> <p>The XXXXX strongly recommends that the proposed changes shown below be made in the language of this section of the Introduction. Further, the XXXXX</p>	<p>In North America, SFI Program Participants who source fiber from uncertified lands, must engage in private landowner outreach and logger training and encourage their suppliers to use the services of qualified professionals and trained loggers, and require adherence to best management practices that protect water quality on those uncertified lands.</p>

believes that requiring suppliers to utilize the services of qualified professionals and trained loggers is inconsistent with the intent of the SFI Standard. The role of Program Participants is to practice and promote sustainable forestry and work toward continuous improvement. The language of “require” is an absolute, which we believe will actually create an impediment to achieving the goal of continuous improvement.

Although it is a fact that SFI Program Participants current source over 90% of their fiber needs from operations utilizing trained loggers, the premise of continual improvement doesn’t necessarily justify requiring this number to be 100%. As acknowledged in the same section of the Introduction, less than 1% of family forest land in North America is certified and many family forest owners do not have the resources to maintain a certified forest. This section also acknowledges that “. . . the lack of certification does not mean these forests are not well managed”.

Many of these family forest owners, especially the owners of small acreages, are dedicated to conducting their own harvest operations. For the same reasons these landowners do not have the resources to maintain a certified forest, they often do not have the resources to become and maintain the status of a trained logger. The XXXXX believes that refusing to purchase logs from family forest landowners who conduct their own logging and do not have the resources to certify their land, will have a net negative impact on the practice of sustainable forestry. For example, if a SFI Program Participant mills refuses to purchase wood from a family forest land owner, these individuals will be given an incentive, if not forced, to sell their wood to non-program participants. By ceasing a business relationship with the SFI program participant mill, these landowners will not have the continued benefit of receiving supplier outreach information and education from that program participant. This will largely isolate these individuals and create the exact

<p>opposite affects of expanding the practice of sustainable forestry.</p> <p>In conclusion, it is the XXXXXs belief that Program Participants should continue to encourage, not require, their suppliers to use the services of resource professionals and trained loggers. There are millions of small family forest landowners across North America that conduct responsible timber harvesting on their own property. SFI program participant mills should not be forced to decline logs from these individuals simply because they prefer to do their own harvesting and they, unfortunately, do not have the resources to maintain a trained logger status or certification on their land. In our opinion, Program Participants should instead be judged on this objective based on their work towards continuous improvement.</p>	
<p>This is another example or terminology confusion. The term “Responsible Fiber Sourcing” and the term “fiber sourcing” are only used in the Principles; they are not used in the Objective. As noted above, we recommend that only one of these terms be defined and used. Also, the reference to “on these lands” is not directly explained.</p> <p>Because procurement encourages elements of sustainability beyond land management, we suggest changing the end of the sentence to reflect the full range of actions (practices) and scope (wood supply area) of influence by procurement participant operations.</p> <p>Taking into consideration the forests of Canada and the United States are so productive, we recommend that the introduction also point to the importance of minimizing deforestation.</p> <p>We agree with the comments on land ownership patterns in the U.S. and discussion of the role of the family forest land owner. However, immediately</p>	<p>“Through SFI’s wood procurement/fiber sourcing requirements, the SFI program stands apart from other forest certification programs by supporting and promoting responsible forestry practices throughout the combined geographic reach of all the SFI program participant’s wood supply operations.”</p> <p>The last sentence of last paragraph on page 8: We think this should read "Responsible" fiber sourcing (or procurement)... rather than "Supporting" fiber sourcing.</p>

<p>following this section, the value of certified forest content in products is characterized as “helps customers and consumer of forest products identify and give preference to products from well managed forests”. This seems to undermine the value of “responsible fiber sourcing” which accounts for “more than 50 percent of the raw material used by SFI Program Participants.” It is important to strengthen the support of the sustainable procurement/responsible fiber sourcing. Also, we would suggest that there be a re-check of the “50 percent”.... The most up-to-date number should be used.</p>	
<p>Good information I would expect to use in public fact sheets.</p>	
<p>XXXXX is encouraged by this section and the recognition that less than 1 percent of family forest land is certified. This class of landowners represents a significant amount of forestland within the U.S. and it is appropriate that SFI acknowledges this group of landowners in the new standard. XXXXX supports the basic principle behind the comments submitted by the XXXXX. SFI should recognize and make a distinction between fiber sourced from private land by “qualified logging professionals” (those with safety training, appropriate insurance licenses, etc) and “certified logging professionals” (those enrolled in an independent third-party certification program).</p> <p>It is in XXXXX’s best interest to have more “Master Loggers” practicing in MN. The Master Logger program in MN is a credible and beneficial program. It provides MN loggers with continual training, education and professional development opportunities. XXXXX believes that there should be incentives and/or at a minimum, recognition of MN Master Loggers and other similar programs by SFI. That said, XXXXX can not limit competition on XXX timber sales to a subset of loggers, as this would discriminate against smaller operators and loggers who are not able or have no interest in becoming “Master Logger” certified. The SFI standard should NOT be changed in a manner that would require the use of “certified logging professionals” on certified lands.</p>	<p>In order to make such a distinction, SFI could add an additional indicator (indicator 9.2) as well as updating the glossary / definition of these terms. (Refer to comments submitted by XXXXX for more details).</p>

We are encouraged that this section recognizes that, “Today, 10 percent of the world’s forests are certified and in North America, while large tracts of public and industrial forest lands are certified, less than 1 percent of family forest land is certified. While SFI Inc. encourages certification of lands owned by small family forest owners, it is also 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 – particularly in the case of those who own small acreages. In the United States, more than 10 million family forest owners account for 60 percent of the forestland and more than 50 percent of the raw material used by SFI Program Participants. Today, 10 percent of the world’s forests are certified and in North America, while large tracts of public and industrial forest lands are certified, less than 1 percent of family forest land is certified. While SFI Inc. encourages certification of lands owned by small family forest owners, it is also 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 – particularly in the case of those who own small acreages. In the United States, more than 10 million family forest owners account for 60 percent of the forestland and more than 50 percent of the raw material used by SFI Program Participants”.

However, Sustainable Forestry Initiative (SFI) needs to take this further. We believe the SFI should consider formal recognition between SFI and independent third party certified logger certification programs. Further, there should be a recognized difference between fiber sourced from family forestland by qualified logging professional and an independent third-party certified logging professional (e.g. Minnesota Certified Master Logger).

Specifically, SFI should develop a template to assess logger certification programs against. See proposed performance measurer 9.2

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. SFI offers a suite of product and promotional labels that allow appropriately certified organizations to make claims to 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 we believe SFI provides the market with a valuable tool to buy responsibly. The SFI program provides a label for certified content as well as a label for fiber sourcing, see Annexes 1 and 2 respectively.

Rationale for proposed change:	Proposed New Language:
Credibility of the standard	The introduction now includes a section on “Responsible Fiber Sourcing” that describes the land ownership patterns in the U.S. and recognizes the role of the family forest land owner. This addition is appreciated. However, immediately following this section, the value of certified forest content in products is characterized as “helps customers and consumer of forest products identify and give preference to products from well managed forests”. This seems to undermine the value of “responsible fiber sourcing” which accounts for “more than 50 percent of the raw material used by SFI Program Participants.” It is important to strengthen the support of the responsible fiber sourcing. Also, we would suggest that there be a re-check of the “50 percent” We’re not sure that number is updated.

Third Party Independent Certification

The SFI Standard requires third party independent certification audits by competent and accredited certification bodies. This 3rd party certification is necessary for both the forest land certification, fiber sourcing certification and chain-of-custody certification. All certification bodies must be accredited by one of the North American members 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).

Rationale for proposed change:	Proposed New Language:
<p>Previously, SFI certificates could be issued without independent audits. Program participants can self verify. This appears to have been removed- 3rd party certification (page 8) and SFI Audit Procedures Scope 1 (page 44)</p> <p>Issues raised before as not covered also do not seem to be in current draft - SFI offers a- "Procurement Certificate" and a C-of-C. The Procurement certificate standards have limited assurances associated with them.</p>	
<p>Documents all the benefits of SFI certification.</p> <p>This is where the public would look for this type of information, not in the back of the Standard.</p>	<p>Add a sentence about how the SFI Audit Procedures support the International Organization for Standardization ISO.</p>

Emerging Themes: Bioenergy and Carbon

The SFI Standard is a research and science-based standard that also takes careful consideration of social, economic and environmental issues related to forest management as well as the interests in the marketplace. Through SFI's continual improvement process it often builds new requirements into its standard that reflect new information and science as it becomes available. In the SFI 2010-1014 Standard, there is new language to address the issues of climate change, carbon management and bioenergy feedstock harvesting.

The SFI Standard applies to management of forests throughout North America, regardless of the forest products derived from management of such forests. High intensity, agro-forestry operations, while they may serve a role in the production of bioenergy feedstock production, are beyond the scope of the SFI Standard. Bioenergy feedstocks are not new products from managed forests, however, there is growing interest in such products given government policies and positions to promote renewable energy. The SFI Standard provides the same assurances regardless of the final product, whether it is solid wood building products, paper products, or feedstocks for bioenergy. In addition, the requirements for forest management and fiber sourcing are the same regardless of whether the end-user is a traditional forest or paper product company or emerging bioenergy production company.

Additionally, sustainable forestry makes an important contribution to mitigating climate change and adapting to changing ecosystems. Notwithstanding the fact that policy solutions have not been solidified regarding the role of managed forests in a regulatory framework, the process of carbon sequestration is a natural by-product of tree growth and therefore an important component of carbon management. As a result, Program Participants have an opportunity to monitor information generated from regional climate models and consider how well-managed forests contribute to resilient ecosystems as an adaptation to a changing climate.

Rationale for proposed change:	Proposed New Language:
Bioenergy feedstocks sounds bad.	Biomass raw materials
There should be some language added to this section to address the fact that the science around carbon management is still in its infancy stages. Some Program Participants may not have access to regional climate models and thus do not "have an opportunity" to monitor that information.	I'm not sure how to re-word this section other than to recognize the fact the science is around carbon management is new and the resources to mitigate climate change impacts will vary from province to state.
Climate change, carbon management, and bioenergy feedstock harvesting are all very new emerging issues. The science behind, and related to, these issues is still being developed and is rapidly evolving every day. The XXXXX believes	The XXXXX proposes that all language and references related to bioenergy, climate change, and carbon sequestration be removed from the 2010-2014 Standard.

<p>that these topics are still too new and the science and knowledge base still too undeveloped for them to be included in the 2010-2014 SFI Standard.</p> <p>The draft standard does temper these new provisions by the recognizing that these issues belong to an emerging science and that regulatory frameworks for the role of managed forests for carbon management is evolving. However, this recognition forces the question of whether these issues should be included in the new standard until the science and regulatory framework is more firmly developed.</p>	
<p>Agro-forestry needs to be defined in the standard.</p>	<p>Agro-forestry needs to be defined in the standard.</p>
<p>Include biomass utilization in bioenergy feedstock discussion. This is a broader term that is unrelated to the end use. Include biomass utilization in definitions.</p>	<p>Biomass production is not a new concept from managed forests, however there is a growing interest in biomass from forests to be used as bioenergy feedstock given government policies and positions to promote renewable energy.</p>

<p>Use this space to propose any new language for the Introduction:</p>
<p>TOC</p> <p>Rationale</p> <p>The Table of Content section label “Fiber Sourcing Objectives” does not match the label on page 22, Objectives for Procurement.</p> <p>Also the section label “Land Management and Fiber Sourcing Objectives” does not match page 25, Objectives for Forest Management and Procurement</p> <p>Proposed</p> <p>Objectives for Procurement</p> <p>Objectives for Forest Management and Procurement</p>

Principles for Sustainable forestry

Program Participants both support sustainable forestry practices on forestland they manage and promote it on other lands. Moreover, Program Participants support efforts to protect private property rights and the ability of all private landowners to manage their forestland sustainably. This support stems from Program Participants' belief that 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 forestland bases. In keeping with this responsibility, 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 with the conservation of soil, air and water quality, carbon, biological diversity, wildlife and aquatic habitat, recreation, and aesthetics.

Rationale for proposed change:	Proposed New Language:
<p>1. Sustainable Forestry: This is a run on sentence that could be slightly rephrased to make it more understandable. "Ecosystem services" and "carbon" are not defined.</p>	<p>1. Sustainable Forestry: Re-word the last phrase as follows: "...ecosystem services, such as the conservation of soil, air and water quality, carbon cycling and sequestration, biological diversity, wildlife and aquatic habitat, recreation, and aesthetics."</p>
<p>It is important that confusion does not exist between language contained in the "Introduction" and language within the Standard itself. We believe that the Introduction is not "auditable", whereas the Principles, Objectives, Performance Measures, and Indicators are auditable.</p> <p>Ecosystem services should be defined</p> <p>Reference to "carbon" in this principle is too vague. What sustainable forestry</p>	<p>Suggest leading this section on Principles for Sustainable Forestry with a header that reads "2010–2014 SFI Standard".</p> <p>...and ecosystem services with the conservation of soil, air and water quality, carbon sequestration, biological diversity...</p> <p>ecosystem services - components of nature, directly enjoyed, consumed, or</p>

ensures is carbon sequestration.	used to yield human well-being
There is a bit of redundancy added to this principle with the part “a land stewardship ethic that integrates reforestation and the managing, growing, nurturing...” Does the term “reforestation” not encompass managing, growing, and nurturing? As already noted in the introduction section of the Standard, carbon management is still in its infancy stages. Thus, I think the term “carbon” should be removed from this principle.	I would suggest re-wording the principle to say “To practice sustainable forestry to maintain and enhance the long-term health of forest ecosystems for the benefit of all living things while providing environmental, economic, social, and cultural opportunities for present and future generations”. The term forest ecosystems in my proposed principle can imply carbon management, biological diversity, etc.
Definition could be better stated with the recognition that the latter part of definition summarizes several key ecosystem services.	To practice sustainable forestry to meet the needs of the present without compromising the ability of future generations to meet their own needs by practicing a land stewardship ethic that integrates reforestation and the managing, growing, nurturing, and harvesting of trees for useful products with the maintenance of forest ecosystem services such as the conservation of soil, air and water quality, carbon sequestration, biological diversity, wildlife and aquatic habitat, recreation, and aesthetics.
Please define the term "ecosystem services" in the glossary	
"ecosystem services" is an undefined term that seems redundant (as I define it) with the remainder of the sentence. I suggest it either be removed or at least defined in the definitions.a land stewardship ethic that integrates reforestation and the managing, growing, nurturing, and harvesting of trees for useful products with the donservation of soil, air and water wuality, cargon, biological diversity, wildlife and aquatic habitat, recreation and aesthetics.
In order for future generations to meet their own needs there must be forests. Nothing in SFI standards rewards or promotes creating new lands into forest uses or keeping existing forests in forest land uses.	Program Participants both support sustainable forestry practices on forestland they manage and promote it on other lands. Moreover, Program Participants support efforts to protect forests and encourage forests as the most desirable land use.

2. Forest Productivity and Health

To provide for regeneration after harvest and maintain the productive capacity of the forestland 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, and other damaging agents and thus maintain and improve long-term forest health and productivity.

Rationale for proposed change:	Proposed New Language:
Some forest damaging agents are beyond the capability of participants to manage to protect the forest. Mountain pine beetle and large forest fire event sare examples.	In addition, within the ability of the participant to influence, to protect...
I suggest removing the term “disease” as it is redundant to list if after “pest” as the definition of a forest pest includes insects, tree diseases, and noxious fungi.	
I like the proposed language.	
	To provide for regeneration after harvest and maintain the productive capacity of the forestland base and to protect and maintain long-term forest and soil productivity. In addition, to protect forests from economically or environmentally undesirable levels of conversion to non-forest uses, wildfire, pests, diseases, and other damaging agents and thus maintain and improve long-term forest health and productivity.
invasives should be included as a factor in determining forest health.	add “invasive plant and animal species” after “pests, diseases,”

3. Protection of Water Resources

To protect water bodies and riparian zones and to conform with best management practices to protect water quality.

Rationale for proposed change:	Proposed New Language:
Does not mention use of Trained Loggers	To protect water bodies and riparian zones and to conform with best management practices, utilize qualified trained resource professionals to protect water quality.
part of this principle is a strategy to achieve the principle.	To protect water bodies and riparian zones. remove and to conform with BMPs to protect water quality.
The phrase "to conform with best management practices" is an indicator of the protection of water resources, not a principle. Objective 3 begins "To protect water quality..." and as a principle, the language in this section should be broad in context.	Sustain the quality of forest water resources.
consider using adhere instead of "conform". Each state has different BMPs. We we feel "Conform" is a better term.	We we feel "Conform" is a better term.
I don't believe it is necessary to elevate BMPs to the Principle level. I don't believe that conforming with just any water quality BMP is part of the vision of forest sustainability. It is more appropriate to leave BMPs as an objective (goal). They are a possible means to an end (water quality) not the end. Otherwise, why would be monitoring their effectiveness.	To protect water bodies and riparian zones.

4. Protection of Biological Diversity

To manage forests in ways that protects and promotes the diversity of wildlife habitats, forest types and ecological or natural community types.

Rationale for proposed change:	Proposed New Language:
"Protects and promotes" are open to interpretation.	Utilize "maintains or enhances" in place of "protects and promotes".
Recommend revised language to stay consistent with wording in Objectives Section and throughout Standard	To manage forests in ways that protects and promotes the conservation of biological and habitat diversity.
While we appreciate the practicality of managing for habitat as a proxy for species, we would caution that an overemphasis on habitat diversity may have the unintended consequence of selecting for edge species, smaller range species, etc. Species diversity at larger scales and species requiring broad ranges may not benefit from the heterogeneity resulting from managing for habitat diversity. While the commitment to biological diversity, including species, is clarified at the level of the indicator (#1, p. 19) it is not reflected in the relevant Principle or Objective. Recommend editing Principle and Objective to be more inclusive.	Recommend that the principle include promoting the diversity of species (including plants).
grammatical in nature	To manage forests in ways that protect and promote the diversity of wildlife habitats, forest types and ecological or natural community types.
OK	

<p>5. Aesthetics and Recreation</p> <p>To manage the visual impact of harvesting and to provide recreation opportunities for communities.</p>	
Rationale for proposed change:	Proposed New Language:
Visual impacts are affected by more than just harvest operations	To manage the visual impact of forest operations and to provide recreation opportunities for communities.

<p>XXXXX supports the addition of this new principle, as this supports/recognizes multiple use and fits with the mission of public land management agencies. It is appropriate that the SFI standard address this issue surrounding forest / resource management.</p>	
<p>Need to clarify how the community is to have a recreational opportunity as well as expand this to include cultural and social aesthetics which are more than merely visual. Hunting and fishing uses require access</p>	<p>To manage the visual impact of harvesting and to provide access for forests for cultural, and recreation opportunities for communities.</p>

<p>6. Protection of Special Sites</p> <p>To manage forests and lands of special significance (biologically, geologically, historically or culturally important) in a manner that protects their integrity and takes into account their unique qualities.</p>	
<p>Rationale for proposed change:</p>	<p>Proposed New Language:</p>
<p>“Integrity” is not defined.</p>	<p>Utilize “maintains, restores, or enhances their unique qualities” in place of “protects their integrity and takes into account their unique qualities”.</p>
<p>The supporting statement of Protection of special sites lacks an adjective with the words biologically, geologically and historically. Culturally important is a defined term, and as such “important” does not further define the first three terms. The term “biologically” has been replaced with “ecologically” in Objective 6 and in the definition of Special Sites, and should be changed to “ecologically” in this principle for clarity. In addition, “historical” sites are included in the definition of culturally important... Its use is duplicative in the Principle and should be deleted.</p>	<p>“To manage forest and lands of special significance (ecologically or geologically unique or culturally important) in a manner that protects their integrity and takes into account their unique qualities.”</p>
<p>Good revision</p>	

<p>Given narrow access rights by public difficult to imagine what good a cultural site would be without access to it by the specific population.</p>	<p>To manage forests and lands of special significance (biologically, geologically, historically or culturally important) in a manner that protects their integrity and takes into account their unique qualities including providing access.</p>
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<p>7. Responsible Procurement Practices in North America</p> <p>To use and promote among other forest landowners sustainable forestry practices that are both scientifically credible and economically, environmentally, and socially responsible.</p>	
<p>Rationale for proposed change:</p>	<p>Proposed New Language:</p>
<p>Little easier reading.</p>	<p>To use and promote sustainable forestry practices that are both scientifically credible and economicall, environmentally, and socially responsible among other forest landowners.</p>
<p>Concern: Principle 7 addresses responsible procurement practices in North America while Principle 8 addresses them outside of North America. These two Principles should be written in a manner which is more congruent.</p>	<p>Recommendation (Principle 7): “To use and promote among other forest landowners sustainable forestry practices that are both scientifically credible and economically, environmentally, and socially responsible, and to avoid wood fiber from illegally logged forests.</p>
<p>The text of the principle is identical to current principle 2. Since it now focuses on procurement (fiber sourcing), and since sustainable forestry on participants’ lands is addressed in every other principle, the words “use and” should be deleted.</p>	

8.Avoidance of Controversial Sources including Illegal Logging in Off-Shore Procurement

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.

Rationale for proposed change:	Proposed New Language:
<p>Concern: Principle 7 addresses responsible procurement practices in North America while Principle 8 addresses them outside of North America. These two Principles should be written in a manner which is more congruent.</p> <p>Also, it is unclear what is meant by “effective social laws.”</p>	<p>Recommendation (Principle 8): “To avoid wood fiber from illegally logged forests when procuring fiber outside of North America.”</p>
<p>The language in Principle 8 should include language from Principle 7, with the inclusion of “off shore”</p>	<p>“Sustainable Forestry Practices for Procurement/Fiber Sourcing Off-Shore of North America. Ensure that procurement/fiber sourcing from outside North America precludes wood from controversial sources including illegal logging and from sources without effective social standards.”</p>
<p>This seems tricky since the US does not have effective social laws.</p>	

9. Legal Compliance

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

Rationale for proposed change:	Proposed New Language:

<p>10. Research</p> <p>To support advances in sustainable forest management through forestry research, science and technology.</p>	
<p>Rationale for proposed change:</p>	<p>Proposed New Language:</p>
<p>Genetically modified trees were raised as an issue before but not covered in the current draft</p>	
<p>This principle duplicates the language of the objective, and focuses on “support” rather than the advancement of science.</p>	<p>To contribute to advances in sustainable forest management through research that supports the development of science and technology.</p>

<p>11. Training and Education</p> <p>To improve the practice of sustainable forestry through training and education programs.</p>	
<p>Rationale for proposed change:</p>	<p>Proposed New Language:</p>

12. Public Involvement

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

Rationale for proposed change:	Proposed New Language:
In essence are we saying broaden SFI certification on public lands? The definition in the Standard of "public land" is land enrolled in the SFI program, so why do we need to broaden the practice of sustainable forestry on SFI certified public lands? Coming from a certified public lands organization, what would this mean to us?	
Involvement would be more meaningful if access was included	To broaden the practice of sustainable forestry on public lands through community involvement and access

13. Transparency

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

Rationale for proposed change:	Proposed New Language:

14. Continual Improvement

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

Rationale for proposed change:

Proposed New Language:

Keeping forests in forest land uses is critical for long term sustainability

Use this space to propose any new Principles:

the current standards permit land owners to sell off their forest land or convert their forest land and as long as they manage what they have left by the existing standards then they can claim sustainability which it isn't

Some Program Participants own forestland, others own forestland and manufacturing facilities, and still others own manufacturing facilities only. As such,

SFI Standard land management objectives 1–7 provide measures for evaluating Program Participants' compliance with the SFI Standard on forestlands 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 8-13 provides measures for evaluating Program Participants' compliance with the SFI Standard through their procurement programs.

SFI Standard land management and fiber sourcing objectives 14-20 provide measures for evaluating all Program Participants' compliance with the SFI Standard

for research, training, legal compliance, public and landowner involvement, management review, and continual improvement.

A summary of SFI 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 management, 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 fauna.

Objective 5. Maintenance of Visual Quality and Recreational Benefits.

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

Objective 6. Protection of Special Sites.

To manage Program Participant lands that are ecologically, geologically, historically, or culturally important in a manner that recognizes their special qualities.

Objective 7. Efficient Use of Forest Resources.

To promote the efficient use of forest resources.

Objective 8. Landowner Outreach. To broaden the practice of sustainable forestry by forest landowners through procurement programs.

Objective 9. Use of Forest Management and Harvesting Professionals.

To broaden the practice of sustainable forestry by encouraging forest landowners to utilize the services of forest management and harvesting professionals.

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. Promote Conservation of Biological Diversity, Biodiversity Hotspots and Major Tropical Wilderness Areas.

To broaden the practice of sustainable forestry by conserving biological diversity, biodiversity hotspots and major tropical wilderness areas.

Objective 12. Avoidance of Controversial Sources including Illegal Logging.

To broaden the practice of sustainable forestry by avoidance of illegal logging.

Objective 13. Avoidance of Controversial Sources including Fiber Sourced from Areas without Effective Social Laws.

To broaden the practice of sustainable forestry by avoiding controversial sources.

Objective 14. Legal and Regulatory Compliance. Compliance with applicable federal, provincial, state, and local laws and regulations.

Objective 15. Forestry Research, Science, and Technology.

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

Objective 16. Training and Education.

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

Objective 17. Community Involvement 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 18: Public Land Management Responsibilities.

To improve the practice of sustainable forest management on public lands.

Objective 19. Communications and Public Reporting.

To broaden the practice of sustainable forestry by documenting progress and opportunities for improvement.

Objective 20. Management Review and Continual Improvement.

To promote continual improvement in the practice of sustainable forestry and monitor, measure, and report performance in achieving the commitment to sustainable forestry.

Rationale for proposed change:

Useful expansion of the structure of the standard. The expansion of the

Proposed New Language:

<p>number of Objectives is also warranted. No changes proposed.</p>	
<p>Objective 14 is not stated as an action. Objective 10 is a strategy not an objective</p>	<p>Obj. 14: To comply with applicable... I'll leave rewording this one to you.</p>
<p>Objective 2: The insertion of the term “carbon management” in the objective statement is related to a new concern about carbon and climate change. This term is not necessary in the objective because ensuring long term forest productivity and conservation of forest resources... accomplishes carbon management as a by product. Stating it explicitly in the objective seems to be placing more emphasis than may be warranted on carbon management.</p>	<p>Delete the term “carbon management” in Objective 2.</p>
<p>Please continue to take seriously the downstream consequences of making changes to the standard. Although many of the proposed changes are not material in and of themselves, the structural changes proposed are significant and the amount of work involved in updating procedural manuals, evidence files, etc. for all participants involved is a staggering economic burden during extremely tough economic times. Consider carefully the economic ramifications SFI participants incur to implement these changes so as not to create an economic disadvantage in relation to other certification programs.</p> <p>Objective 9 - Forest management and harvesting professionals are not defined terms. Suggest replacing with defined terms such as qualified logging professionals and qualified resource professionals</p> <p>Objective 11 - the title for over-emphasizes promoting conservation of biodiversity hotspots and major tropical wilderness areas, beyond that which is proposed in the revised indicators.</p> <p>Objective 15 - Demonstrating that a Program Participant has “improved”</p>	<p>Objective 9. Use of Qualified Logging and Qualified Resource Professionals. To broaden the practice of sustainable forestry by encouraging forest landowners to utilize the services of qualified logging and qualified resource professionals.</p> <p>Objective 11. Promote Conservation of Biological Diversity.</p> <p>Objective 15. Forestry Research, Science, and Technology. To support forestry research, science, and technology, upon which sustainable forest management decisions are based.</p>

<p>research, etc is very difficult.</p>	
<p>The phrase "carbon management" in Objective 2 is to product specific and market based. It should not be included in the summary for this objective. One could make the argument that if carbon management is included then non-traditional forest products should also be included.</p>	<p>To ensure long-term forest productivity and conservation of forest resources through prompt reforestation, soil conservation, afforestation, and other measures.</p>
<p>Three recommended changes for clarity and consistency</p>	<p>In preamble that starts with "SFI Standard land management objectives 1-7...". Recommend use of word "conservation" instead of word "protection" for consistency.</p> <p>Objective 2. Remove phrase "carbon management" from the objective as the meaning and intent of that phrase are unclear</p> <p>Objective 11. Suggest inclusion of word "international" to read "Promote international conservation of biological...."</p>
<p>Objective 4. While we appreciate the practicality of managing for habitat as a proxy for species, we would caution that an overemphasis on habitat diversity may have the unintended consequence of selecting for edge species, smaller range species, etc. Species diversity at larger scales and species requiring broad ranges may not benefit from the heterogeneity resulting from managing for habitat diversity. While the commitment to biological diversity, including species is clarified at the level of the indicator (#1, p. 19) it is not reflected in the relevant Principle or Objective.</p>	<p>Recommend editing Principle and Objective to be more inclusive.</p>
<p>Objective 2: The term "carbon management" needs to be defined in the glossary of the Standard.</p>	<p>Included in my rationale for proposed change.</p>

Objective 4: I admit that I'm not a big fan of the new term "Forests with Exceptional Value" however; as it is clearly defined in the glossary I do not see it being an issue with implementation. However, if you have added this new term to increase credibility of the SFI Standard with its management of critically imperiled, imperiled species and communities then be prepared to face some scrutiny from SFI critics and FSC fans. For example, the FSC British Columbia Standard uses a similar term called "High Conservation Value Forests". In their glossary, they actually define attributes which would make up a high conservation value forest. It would have been nice to see something like that in the SFI Standard versus creating a term (or borrowing it from NatureServe) for what Program Participants are already doing.

Objective 5: Suggest removing the "Maintenance" and replace with "Management". How can we as forest managers actually maintain visual quality while altering the landscape through harvest activities? What we are actually doing (as least here in BC) is trying to manage the visual impact of our activities. Thus, we are not maintaining the current visual quality of an area but managing for visual quality following an activity.

Objective 10: The current definition with this new objective implies that a forest manager would only employ best management practices to protect water quality which is not the case. Best management practices are also employed to protect forest productivity (for example, season of harvest can limit soil disturbance which can have a huge impact on forest productivity). Thus, I suggest changing the definition for this objective to state "To broaden the practice of sustainable forestry through the use of Best Management Practices to protect forest productivity and water quality."

<p>Please continue to take seriously the downstream consequences of making changes to the standard. Although many of the proposed changes are not material in and of themselves, the amount of work involved in updating procedural manuals, evidence files, etc. for all participants involved is a staggering economic burden during extremely tough economic times. Consider carefully the economic ramifications SFI participants incur to implement these changes so as not to create an economic disadvantage in relation to other certification programs.</p> <p>Regarding the reorganization of the principles, objectives, performance measures, and indicators - the shuffling of the Objectives, Performance Measures and Indicators is disruptive to the development and continuous improvement of individual program systems. The result is a penalization of the better, more sophisticated systems due to having to completely reorganize, number and cross-reference the individual participant's system. It would more helpful to develop a method by which additions and changes to the Standard could simply be added to the end of each Objective, Performance Measure and Indicators to allow individual programs to build upon their existing system. This would promote continuous improvement and allow individual programs to continue to excel rather than essentially starting over every five (or three) years.</p>	
<p>The phrase "carbon management" is vague. Its intent should be better defined before being placed in the standard.</p>	
<p>All three introductions improperly use the word "compliance." The term of art describing adherence to the SFI Standard, or any standard, is "conformance."</p> <p>"SFI Standard fiber sourcing objectives 8-13...":</p> <p>The introduction of this section can be expanded to hold similar content as the introduction to objectives 1-7, and supporting language for procurement</p>	<p>"objective 8-13 provides measures for evaluating Program Participant's conformance to the SFI Standard through the operations they control and/or inform while purchasing and harvesting wood from the forest. Through these objectives Program Participants inform and encourage landowners, loggers and forestry contractors to implement sustainable forestry practices."</p>

<p>should be added.</p>	
<p>Objective 5 could be better stated as outlined below. The addition of recreation needs to be recognized in the Objective as well.</p>	<p>Objective 5. Maintenance of Visual Quality and Recreational Benefits. To manage the visual impact of forest operations and provide recreational opportunities for the public.</p>
<p>OBJ 9, above. The term" Forest Management and Harvesting Professionals" is undefined. Why not use one of the current 3 terms we already have like" Qualified Resource and Logging Professional"?</p> <p>Also, Since this is in procurement's OBJ. 9, it is not covered/required for the landowning SFI Participants. It Must be required for them too.</p>	
<p>Obj. 7 does not follow the same pattern as other objectives.</p>	<p>Obj. 7: To promote the efficient use of forest resources by fully utilizing forest products and encouraging the use of forest biomass as a renewable source of fuel.</p> <p>Obj. 14: add two words -- To ensure compliance with applicable federal, provincial, etc. . .</p>
<p>Objective 5 now includes recreation. While multiple use recreation is something that we support, I do not necessarily agree that it should be at the objective level for sustainable forest management. However, if we are going to place it here the description should not ignore it.</p> <p>Objectives 12/13- These have similar indicators and should be combined.</p> <p>Objective 17-Community involvement should be defined more distinctly. "encouraging the public and forestry community to participate" could imply mandatory stakeholder process like FSC. I still prefer broaden the practice.</p>	<p>Objective 5-To manage the visual and recreational impact of harvesting and other forest operations.</p> <p>Objective 12-13 Avoidance of Controversial Sources a) Illegal Logging b) Areas without effective social laws</p> <p>Objective 17 Broaden the practice of sustainable forestry</p>

<p>XXXXX suggests that SFI clarify if Objectives 8-13 ONLY apply to procurement companies, or if these also apply to land managers. Although the introduction language seems to state that these apply only to procurement operations, some of the performance measures and indicators could apply to both land managers and procurement operations. Please clarify this either in the introduction to these objectives or in the performance measures / indicators.</p>	
	<p>Objective 2. Forest Productivity To ensure long-term forest productivity, carbon management, and conservation of forest resources through prompt reforestation, soil conservation, afforestation, maintenance of forest in forest land uses, and other measures.</p> <p>Objective 5. Maintenance of Visual Quality and Recreational Benefits. To manage the visual impact of harvesting and enhance recreational opportunities other forest operations.</p> <p>Objective 14. Legal and Regulatory Compliance. Compliance with applicable international conventions, federal, provincial, state, and local laws and regulations.</p>

Use this space to propose any new Objectives:

I do not have any new Objectives to propose but I would suggest that list of Objectives is given in sections like the table of contents i.e land management, fiber sourcing (procurement), etc.

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.	
Rationale for proposed change:	Proposed New Language:
No changes proposed simply a comment: The changes are good, it is good to incorporate the developing areas of bioenergy and climate change.	
It is unclear how sustainable harvest levels by management unit and/or forest type are not appropriate for all forest types in all situations. To come up with accurate sustained yield levels, one needs to remove areas that reduce potential harvest levels (FECVs, riparian areas, special sites). If you don't remove these, over-cutting within a given forest type or for an entire management unit could occur. The current language around "long-term" in the standard/glossary leaves it open to harvest more than growth over a rotation or longer - this is one of the fundamentals of sustainable forestry.	

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.	
Rationale for proposed change:	Proposed New Language:
Concerned that "forest management plans" needs to be defined or the PM only refer to "forest management planning". In BC, harvest levels on public	Define "forest management plans" broadly or refer to "forest management planning" only.

<p>lands are determined through management unit "Timber Supply Reviews" followed by BC Chief Forester AAC determinations. Our SFMPs, which may be construed as "forest management plans", do not specify long term harvest levels.</p>	
<p>As presently written, the spatial scale is not defined. A spatial framework is needed, so that within an HUC of an appropriate size a watershed can't be absorbed in a larger landholding. For example, consider a 250,000-acre watershed, where the total ownership of a company of 80,000 acres has been harvested to the point where little additional harvest can occur for another 30-40 years or longer. But, because this only represents 7% of the company's ownership within the state, it can get hidden within the larger ownership, and still meet the sustainability requirement. In addition, "long-term" needs to be defined in the context of a TIMO type ownership discussed above.</p>	

<p>Indicators:</p> <ol style="list-style-type: none"> 1. forest management planning at a level appropriate to the size and scale of the operation, including <ol style="list-style-type: none"> 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 f. up-to-date maps or a geographic information system (GIS); g. recommended sustainable harvest levels for conventional, and where applicable, bioenergy feedstock harvesting; and
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h. a review of nontimber issues (e.g., pilot projects and economic incentive programs to promote water protection, carbon storage, climate induced ecosystem change, bioenergy feedstock production, or biological diversity conservation).

2. Documentation of annual harvest trends in relation to the sustainable forest management plan.

3. A forest inventory system and a method to calculate growth and yield.

4. Periodic updates of 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, etc.).

5. Documentation of forest practices (e.g., planting, fertilization, and thinning) consistent with assumptions in harvest plans.

Rationale for proposed change:	Proposed New Language:
<p>#1G Replace Bioenergy feedstock with Biomass raw material</p> <p>#1C Land classification should indicate forest lands intended for real estate development, these should not contribute growth to harvest planning</p> <p>#2 Does not ensure implementation of harvests are consistent with planned harvest levels and classification</p>	<p>#1C a land classification system that quantifies productivity and land use (working forest or development)</p> <p>#2 Harvest level implementation and documentation of annual harvest consistent with sustainable forest management plan.</p>
<p>Not sure "climate induced ecosystem change" is a parallel concept in h.</p>	<p>h. ... carbon storage, bioenergy feedstock product, or biological diversity conservation, or to address climate induced ecosystem change."</p>
<p>g. In BC "conventional" harvesting refers to ground-based mechanized harvest systems (as opposed to cable, heli, etc).</p>	<p>Define "conventional"</p>
<p>Indicator 3 is redundant-covered by 1 a. and 1 e.</p>	<p>Delete Indicators 1 d., 3 and 4.</p> <p>1 h. recommend harvest levels for primary consumption , and where</p>

<p>Indicator 4 is redundant-covered by 1 a., 1 b. and 1 e.</p> <p>1 d. is not a valid indicator with "where available"</p> <p>1 g. is too specific for bioenergy feedstock.</p>	<p>applicable, additional fiber utilization.</p>
<p>Indicator 4.</p> <p>Current wording is non specific and unclear as to what productivity the indicator or referring to i.e. harvesting productivity, forest productivity or mill productivity. I suggest you insert the word "forest" here to clearly define which type of productivity you are referring to.</p>	<p>Indicator 4. Periodic updates of inventory and recalculation of planned harvests to account for changes in growth due to forest productivity increases or decreases (e.g. improved data, long term drought, fertilization, climate change, etc.)</p>
<p>Indicator 1g references as it relates to sustainable harvesting, a difference between conventional and bioenergy feedstock harvesting. When it comes to harvesting and ensuring sustainability there is no difference. Recommend eliminating references to bioenergy feedstock harvesting.</p> <p>Indicator 1h references "climate induced ecosystem change". There is no way to measure change due to changes in the climate. Recommend that this wording be deleted.</p> <p>Indicator 4 includes as one of the examples, climate change. There isn't a process that can be used to determine changes in growth due to climate change. References to anything that can not be measured, including climate change should be deleted.</p>	<p>Indicator 1g - for conventional harvesting; and.....</p> <p>Indicator 1h -promote water protection, carbon storage, bioenergy feedstock production....</p> <p>Indicator 4 -(e.g. improved data, longterm drought, fertilization, etc.)</p>
<p>Performance Measure 1.1, Indicator #4: Changes in planned harvest levels can result for many reasons other than a change in growth due to productivity increase or decrease, which in most temperate regions will not even be a measurable change or trend. Indicator #1 already requires (a) a long term resource analysis (b) a periodic or ongoing forest inventory, and (c) a review of</p>	<p>Delete Indicator #4</p>

<p>non-timber issues making indicator #4 as proposed to be redundant.</p>	
<p>1.1.g Delete indicator, as “sustainable harvest levels for ... bioenergy feedstock production” is premature at this time. At present, wood going for bioenergy is opportunistic at best. Until markets develop that strongly increase demand, this is not a relevant indicator. Perhaps, if an indicator is needed to address this, add something along the lines “wood for bioenergy feedstock production is considered in overall sustainable harvest planning.</p> <p>1.1.h remove phrase “climate induced ecosystem change” as it is vague and ambiguous</p>	<p>Delete indicator 1.1.g. If absolutely necessary to have an indicator to address this, add something along the lines “wood for bioenergy feedstock production is considered in overall sustainable harvest planning.</p> <p>1.1.h Delete phrase "climate induced ecosystem change" from indicator</p>
<p>long term is defined as one rotation or longer, in some cases a rotation (growing 30+ white pine in Maine) can be 100 years, which is a very long time to have as a requirement to analyse the resource.</p>	<p>change definition of long term: either using "where appropriate" or perhaps by not defining long term at all to leave this at the discretion of the land manager and still keep a straight face.</p>
<p>1g. Suggest changing the wording around "conventional" or defining in the glossary. In BC, the term conventional is used to describe a harvest method (i.e. conventional vs. cable). Annual allowable harvest levels (AAC) are not determined by conventional vs. cable and would be difficult to generate as the decision on whether an area will be harvested by conventional or cable means is made after the AAC determination.</p> <p>1g. Will interpretation guidelines be released as to what SFI Inc. expects for this indicator with respect to carbon storage, climate induced ecosystem change? In BC, the government completes the long term resource analysis which would take into account nontimber issues.</p>	<p>Define conventional in the glossary section or remove.</p>
<p>Concern 1.1.1.g.: It may be premature for the standard to require that forest management plans include sustainable harvest levels for biomass (bioenergy feedstock) given the limited, knowledge, experience and technology</p>	<p>c: “recommended sustainable harvest levels” (delete “for conventional, and where applicable, bioenergy feedstock harvesting.”</p> <p>Also, add a definition for “harvesting” or “forest operations” in the glossary</p>

<p>(particularly for Canada in which a single Forest Management Plan may cover an area over half million hectares with diversity of conditions and circumstances). Conventional and bioenergy harvesting does not need to be specified here, since the second paragraph under Emerging Themes: Bioenergy and Carbon on page 9 clearly indicates that the standard applies to all products of the forest.</p> <p>Concern 1.1.1.h.: This terminology is unclear and confusing – in Canada non timber issues generally refers to forest values and interests outside the forest products industry i.e. tourism, recreation, trapping etc. It appears to reference “global environmental impacts” & “non conventional forest products”.</p>	<p>that includes reference to bioenergy feedstock. Objective 5 – PM 5.1 is a good example of where the definition of harvesting should include bioenergy operations.</p> <p>Recommendation 1.1.1.h: “a review of other forest values (e.g. pilot projects...)”</p>
<p>For the purpose of this indicator, there is no reason to distinguish between conventional or other harvests, i.e. bioenergy feedstock.</p> <p>There is little information available concerning climate induced changes at an ecosystem level.</p> <p>It is not realistic to suppose that a landowner can account for an increase or decrease in productivity due to climate change.</p>	
<p>The phrase in 1.1.1.h “climate induced ecosystem change” is vague and undefined. Models that predict “climate induced ecosystem change” contain a high degree of uncertainty even at the largest scales, and would not be a useful forest management tool.</p> <p>Including items like long-term drought and climate change in the harvest productivity models implies a level of sophistication that does not exist. Model-based predictions are still changing fairly regularly and similar models don't always give similar results. This would cause frequent shifting in forest</p>	<p>We recommend the term “climate induced ecosystem change” be deleted.</p>

planning efforts and would probably appear very inconsistent.	
the addition of climate induced ecosystem change is questionable in this context. For example, pilot projects and incentive program to promote climate induced ecosystem change?????	a review of nontimber issues (e.g., pilot projects and economic incentive programs to promote water protection, carbon storage, bioenergy feedstock production, or biological diversity conservation).
Forest roads are an essential asset to manage a sustainable forest. Neglecting to substantively mention roads and access easements (throughout the Objectives) makes a harmfully-wrong implication that roads are unimportant to forest management.	ADD: 1. c. forest road and access inventory
#2 should include a minimum period of time for keeping proper documentation. #4 needs some indication of how periodic the updates should be.	#1 - "Long-term resource analysis capabilities to guide forest management planning at a level appropriate to the size and scale of the operation, which would include:"

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

Resource analysis needs to consider non-timber values. Reviewing the issues does not go far enough to ensure full economic value is realized. Add indicator: "a valuation and inventory of the non-timber forest product resources."

Objective 2. Forest Productivity. To ensure long-term forest productivity, carbon management, and conservation of forest resources through prompt reforestation, soil conservation, afforestation, and other measures.	
Rationale for proposed change:	Proposed New Language:
The insertion of the term "carbon management" in the objective statement is	Delete the term "carbon management".

related to a new concern about carbon and climate change. This term is not necessary in the objective because ensuring long term forest productivity and conservation of forest resources... accomplishes carbon management as a by product. Stating it explicitly in the objective seems to be placing more emphasis than may be warranted on carbon management.	
The science behind carbon management is still in the development stage. Including carbon management or even carbon sequestration in Objective 2 would require a Program Participant to quantify forest carbon to ensure its presence, even though it's generally recognized that forests contain carbon.	To ensure long-term forest productivity and conservation of forest resources through prompt reforestation, soil conservation, afforestation, and other measures.
References to carbon management should be deleted. One area of forest productivity should not be highlighted and given more weight than another area of productivity. For example, why not highlight wildlife management, soil productivity, etc. Recommend that carbon management be deleted in this section and add a definition for Forest Productivity that gives several examples of areas to address including carbon management.	To ensure long-term forest productivity and conservation of forest resources....
Remove phrase "carbon management" from the objective as the meaning and intent are unclear	Objective 2. Forest Productivity. To ensure long-term forest productivity and conservation of forest resources through prompt reforestation, soil conservation, afforestation, and other measures.
My concern is that carbon management gets in the way of timber production thru changes in rotation age. I don't think there is alot of firm info dealing with this for the average forester. I just basicly have questions about an area I do not know much about and think we should move cautiously.	
Carbon management needs to be defined in the glossary.	
Define: Carbon Management – include definition in glossary.	
The science behind carbon management and marketing is still in the development stage.	To ensure long-term forest productivity and conservation of forest resources through prompt reforestation, soil conservation, afforestation, and other measures.

The phrase "carbon management" is vague. Its intent should be better defined before being placed in the standard.	
Ensuring "carbon management" under this objective is vague, and the term is not included in the definitions section. This term must be defined if it is used in the Standard. If no definition is included, then the term must be dropped entirely.	
Carbon management is undefined. The term does not occur elsewhere in OBJ 2 or in the glossary. This makes it very tough for auditing.	Delete the mention of "carbon management". Let the topic mature in the government and workplace and add it next revision.

Performance Measure 2.1. Program Participants shall reforest after final harvest, unless delayed for site-specific environmental or forest health considerations, through artificial regeneration within two years or two planting seasons, or by planned natural regeneration methods within five years.	
Rationale for proposed change:	Proposed New Language:
<p>BC has well-established and effective ecosystem-based stocking standards for harvesting on public lands. Licensees (including BCTS) are required to detail these requirements in Forest Stewardship Plans, which are submitted to the Ministry of Forests for approval.</p> <p>These stocking standards do not match the detailed requirements in PM 2.1 and there have been many occasions where we have achieved our FSP stocking requirements but have not met the exact wording of SFI PM 2.1.</p> <p>PM 2.1 also appears to be out of sync with the structure of other parts of the standard. PMs are not normally as prescriptive as this.</p>	<p>Suggest that either:</p> <ol style="list-style-type: none"> 1) PM 2.1 be replaced with a more generic statement relating to "prompt reforestation" and the current wording be moved to "indicator" status where it can be "substituted or modified" at the local level with a more appropriate statement, or 2) modify the PM to include "or other legal requirements"
pm is too prescriptive.	end pm at forest health considerations. The remainder of the pm is better

	addressed by indicator 2.
The concern is that in northern temperate climates, some lowland conifer types may require more than 5 years to obtain adequate natural regeneration. It could be argued that northern climates and species requirements don't support natural regeneration within 5 years because of site-specific environmental conditions. If SFI doesn't accept the environmental argument for delayed natural regeneration then a change in language is necessary.	Additional verbiage would make the latitude in the standard more explicit. "Program Participants shall reforest after final harvest, unless delayed for site-specific environmental or forest health considerations, through artificial regeneration within two years or two planting seasons, or by planned natural regeneration methods within an appropriate number of years for the forest type and the region, generally within 5 years."
This performance measure should be clarified to allow fill planting if the planned natural or artificial planting does not meet the required stocking standards due to site-specific reasons.	"Participants shall reforest after final harvest, unless delayed for site-specific environmental or forest health considerations, through artificial regeneration within two years or two planting seasons or by planned natural regeneration methods within five years, which, in either case, may be supplemented as necessary due to site conditions with planting."

- Indicators:
1. Designation of all management units for either natural or artificial regeneration.
 2. Clear criteria to judge adequate regeneration and appropriate actions to correct understocked areas and achieve acceptable species composition and stocking rates for both artificial and natural regeneration.
 3. Minimized plantings of exotic tree species and research documentation that exotic tree species, planted operationally, pose minimal risk.
 4. Protection of desirable or planned advanced natural regeneration during harvest.

5. Artificial reforestation programs that consider potential ecological impacts of a different species or species mix from that which was harvested.	
Rationale for proposed change:	Proposed New Language:
Indicator 5 will require a rationale each time there is a change from the original stand.	Artificial reforestation programs that utilize ecologically appropriate species selection for the site.
<p>Concern 2.1.1: The term “management units” is confusing in Canadian context."</p> <p>Concern 2.1.3: Concern: Exotic species should be considered in the context of conservation of biodiversity and invasiveness. Also, Risk is not well defined in this context.</p> <p>Recommendation: Add the word “invasive” and “biodiversity” – Suggest: “Minimized plantings of exotic tree species and research documentation that exotic tree species, planted operationally, pose minimal risk of invasiveness and loss of biodiversity.”</p>	<p>Recommendation 2.1.1: Replace “management units” with either “harvest areas” or “areas of harvest” or “planned harvest areas”.</p>
Eliminate the term "artificial regeneration". Although it is a technical term used by silviculturists in the industry, it is a term that is offensive to those not familiar with forestry. Our young trees are not "artificial".	2. . . . species composition and stocking rates for planted, seeded and natural regeneration.
5. Artificial REFORESTATION... contradictory term different than the 'Definitions' and use elsewhere.	5. Artificial regeneration...
In #3, we recommend no use of exotic species.	Change #3 to “Prohibition on plantings of exotic tree species”

Use this space to propose any new Indicators to Performance Measure 2.1:

It should be noted that many examples exist where afforestation has had negative ecological impacts. For instance, softwood planting within rangeland has been very controversial in wildlife circles because of the invasive potential of woody species and impacts to upland gamebird habitat. Add an indicator that limits the role of afforestation to ensure that impacts on non-forested ecosystems are reduced. Add indicator: "Afforestation programs that consider potential ecological impacts of the selection and planting tree species in non-forested landscapes."

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

Performance Measure 2.2. Program Participants shall minimize chemical use required to achieve management objectives while protecting employees, neighbors, the public, and the forest environment.

Rationale for proposed change:

Specify types of "chemicals" being referred to here – pesticides, herbicides, and/or insecticides. Also, this needs to include all habitats, not just forests, as forest management can affect other habitat types.

Proposed New Language:

Add "and wildlife and aquatic habitats" to end.

Indicators:

1. Minimized chemical use required to achieve management objectives.

2. Use of least-toxic and narrowest-spectrum pesticides necessary to achieve management objectives.
3. Use of pesticides registered for the intended use and applied in accordance with label requirements.
4. Use of integrated pest management where feasible.
5. Supervision of forest chemical applications by state- or provincial-trained or certified applicators.
6. Use of best management practices (BMPs) appropriate to the situation; for example,
 - a. Notification of adjoining landowners or nearby residents concerning applications and chemicals used;
 - b. appropriate multilingual signs or oral warnings;
 - c. control of public road access during and immediately after applications;
 - d. designation of streamside and other needed buffer strips;
 - e. use of positive shutoff and minimal-drift spray valves;
 - f. aerial application of forest chemicals parallel to buffer zones to minimize drift;
 - g. monitoring of water quality or safeguards to ensure proper equipment use and protection of streams, lakes, and other water bodies;
 - h. appropriate storage of chemicals;
 - i. filing of required state or provincial reports; or
 - j. use of methods to ensure protection of threatened and endangered species.

Rationale for proposed change:

Proposed New Language:

Ind 4. "where feasible" invalidates the indicator. An IPM plan would indicate the feasible treatment options. Ind 6. BMPs are about water quality. Need a different term.	Ind 4. remove words "where feasible." Ind 6. use of defined management practices appropriate...
The definition of BMP was modified to refer only to protection of water quality. We agree with that revision. Consequently, the use of BMPs in Indicator 6 is not appropriate.	6. Use of management practices appropriate to the situation; for example,
What about herbicides? Does this include insecticides? Also, there needs to be some evidence provided that the chemical in use is the "least-toxic" chemical on the market.	There needs to be an indicator wherein they are asked to justify their use of chemicals. Are they the least persistent chemical on the market, or are there alternatives that have been explored? Is a justification given for what they do use?

Use this space to propose any new Indicators to Performance Measure 2.2:

Performance Measure 2.3. Program Participants shall implement management practices to protect and maintain forest and soil productivity.	
Rationale for proposed change:	Proposed New Language:
Use of technology and equipment available	8. Use of communication technology and low-impact harvesting and forwarding machines to reduce soil compaction and disturbance.
	Add "forest" between "implement" and "management."

Indicators:

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

Rationale for proposed change:	Proposed New Language:
Indicator 5 is not specific regarding silvicultural norms, which could be positive or negative. Merely requiring certified forests to be managed in the same manner as nearby forests is not consistent with scientific understanding of sustainable forestry. Throughout the eastern hardwood region and adjacent northern hardwood and mixed conifer types the practice of hi-grading (taking the best trees and leaving the rest) is the norm. This is not sustainable (Dr.	Retention of vigorous trees during partial harvesting, consistent with scientific silvicultural standards for the area.

Ralph Nyland and others have documented this.	
#7 Could be counter productive to the goal of maintaining soil productivity. If you reduce roads and increase skidding distances the overall impact to soil can be much worse.	#7 Road construction and skidding layout to minimize impacts to soil productivity.
Ind 1. So if a map is not available you meet the indicator?	Ind 1. Remove wording " where available"
Indicator 2.3.6: Use of the phrase "conventional and, where applicable, bioenergy feedstock" is unnecessary, and doesn't read well.	Indicator 2.3.6: Use "Criteria that address harvesting and site preparation to protect soil productivity."
Indicator 6 - Again, there should be no distinction made between conventional and bioenergy feedstock harvesting. Criteria to protect soil productivity should be developed for all products harvested from the forest.	Indicator 6 - Criteria that address conventional harvesting and site preparation.....
Concerned with # 4 and 6 and how retained woody debris is measured and what is considered. How does this possibly conflict with good utilization practices and being a good steward.	
Indicator 6: Same comment for the term "conventional" as submitted for Objective 1, Performance Measure 1.1, Indicator 1g.	
There is no difference between conventional or any other harvest type.	
6. Change bioenergy feedstock to biomass	
7. "MINIMIZE" road construction... In the context of the Standards Definition, roads are here mis-characterized in the same pail as chemicals... or something we don't do very often, or keep to a minimum. This is wrong! Forest road access is essential, and VERY common in managed forests--and therefor should not be maligned as written in this indicator. Roads must be articulated as being both maintained AND constructed assets.	7. Construct and maintain a stable road system to meet management objectives effectively.
In #2, define "methods." In #5, define "partial harvesting."	In #3, change "loss of soil" to "soil loss" to improve readability.

Use this space to propose any new Indicators to Performance Measure 2.3:

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

Rationale for proposed change:	Proposed New Language:
Some damaging events are beyond the ability to control or manage. I.e Mountain pine beetle , large forest fires.	insert ... shall manage "within the ability of the participant to influence" so as to protect...
Same comment as previously submitted with respect to term "pest" and "disease".	Remove disease.
Needs to include invasives.	Add “and invasive plant and animal species” after “diseases.”

Indicators:

1. Program to protect forests from damaging agents.
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.

4. Where available, monitor information generated from regional climate models and consider the results of these efforts in planning where practical and consistent with management objectives.

Rationale for proposed change:	Proposed New Language:
Indicator 2.4.4: Recommend that this indicator be dropped, or alternately, picked up in Objective 1, Forest Management Planning and that wording be changed from only addressing “climate models”.	Indicator 2.4.4: If this indicator is kept, change wording to “Monitor climate change information and models...”
Indicator 2.4.4 – We recommend this new Performance Measure be deleted. Regional climate change models at best show long term trends and at worst show projections backed up by little more than educated guesses. There is no credible way to incorporate this type information into current forest management on the ground practices, let alone a credible way to audit results. This indicator is playing more to the issue of the day, rather than improvement of on the ground forestry practices.	Delete Indicator 2.4.4
Thank you for starting off Indicator 4 with "Where available".	
<p>Concern 2.4.4:</p> <p>There are a number of “regional climate models” available that can give conflicting results. This is not an auditable item. The entire issue of climate change is abstract and widely debated within the scientific community.</p>	<p>Recommendation 2.4.4: Reference to this issue should be avoided in the Standard until such time that there is a common recognition and consensus on the issue. Delete this indicator related to regional climate models.</p>
Indicator 2.4.4: Inclusion of results of “regional climate models” is only	Indicator 2.4.4: This indicator should be deleted.

minimally supported by credible scientific research and by definition very speculative. Model based predictions are still changing fairly regularly and can give conflicting results. This would cause frequent shifting in forest planning efforts and would probably appear very inconsistent.	
I question the value of indicator 4 and it is better suited as an additional consideration under research (15.1.1.g.)	Recommend removing Indicator 4 as it is adequately covered in research requirements.
2.4.4-- the word "monitor" is too encompassing; can denote a long term process. Use "consider" instead--accomplishes the same thing.	2.4.4 use "consider" in place of "monitor"
Delete number 4 -- there could be several regional climate models that conflict. There is scientific basis for questioning whether models are correct. Indicators must be objective and measurable.	

Use this space to propose any new Indicators to Performance Measure 2.4:
Add indicator 2.4.5- "Include a process to salvage timber in timely fashion to capture volume loss prior to mortality and to avoid spreading risk to adjacent stands."

Performance Measure 2.5. Program Participants that deploy improved planting stock, including varietal seedlings shall use sound scientific methods.	
Rationale for proposed change:	Proposed New Language:

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Indicator:	
1. Program for appropriate research, testing, evaluation, and deployment of improved planting stock, including varietal seedlings.	
Rationale for proposed change:	Proposed New Language:

Use this space to propose any new Indicators to Performance Measure 2.5:

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

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

Rationale for proposed change:	Proposed New Language:

Performance Measure 3.1. Program Participants shall meet or exceed all applicable federal, provincial, state, and local water quality laws and meet or exceed best management practices developed under Canadian or U.S. Environmental Protection Agency–approved water quality programs.	
Rationale for proposed change:	Proposed New Language:

Indicators:
<ol style="list-style-type: none"> 1. Program to implement state or provincial BMPs during all phases of management activities. 2. Contract provisions that specify BMPs compliance. 3. Plans that address wet-weather events (e.g., inventory systems, wet-weather tracts, definitions of acceptable operating conditions).

4. Monitoring of overall BMPs implementation.	
Rationale for proposed change:	Proposed New Language:

Use this space to propose any new Indicators to Performance Measure 3.1:

Performance Measure 3.2. Program Participants shall have or develop, implement, and document riparian protection measures based on soil type, terrain, vegetation, harvesting system and utilization levels, and other applicable factors.	
Rationale for proposed change:	Proposed New Language:
Vernal pools of ecological significance is a regional issue.	Suggest instead of saying "...including bogs, ..." replace with "e.g. bogs, ..." which gives them as examples. This approach is used in other parts of the standard.
I feel that there is little to no significant relationship between riparian protection and utilization levels. Additionally utilization is already addressed in Objective 7 Efficient Use of Forest Resources.	Performance Measure 3.2 Program Participants shall have or develop, implement, and document riparian protection measures based on soil type, terrain, vegetation, harvesting system and other applicable factors.

<p>XXXXX thinks that the definition of vernal pools is too vague and that it would be helpful if SFI defined or gave an example of a vernal pool of “ecological significance.” The definition must allow for regional variations and flexibility.</p>	
<p>The term “riparian” as used herein is restricted to water quality protection, while the ecological functions of riparian zones, depending on stream order (etc.), make it one of the most diverse and species rich wildlife habitats. The text, Riparian management in forests of the continental Eastern United States edited by E. S. Verry, J. W. Hornbeck, and C. A. Dolloff, define riparian areas as follows:“Riparian areas are three-dimensional ecotones of interaction that include terrestrial and aquatic ecosystems, that extend down into the groundwater, up above the canopy, outward across the floodplain, up the near-slopes that drain to the water, laterally into the terrestrial ecosystem, and along the water course at a variable width.” “Riparian protection measures” should therefore be broadened beyond a focus on water quality to include wildlife habitat and the definition of riparian amended.</p>	<p>Add “ecological function” after vegetation.</p>

- Indicators:
1. Program addressing management and protection of streams, lakes, and other water bodies and riparian zones.
 2. Mapping of streams, lakes, and other water bodies as specified in state or provincial BMPs and, where appropriate, identification on the ground.
 3. Implementation of plans to manage or protect streams, lakes, and other water bodies.
 4. Identification and protection of nonforested wetlands, including bogs, fens, and marshes, and vernal pools of ecological significance.

5. Where regulations or BMPs do not currently exist to protect riparian areas, use of experts to identify appropriate protection measures.

Rationale for proposed change:	Proposed New Language:
<p>Ecological significance would be difficult to define. The term will only lead to auditor/participant debate.</p>	<p>Drop ecological significance.</p>
<p>Indicator 3.2.4: Adding the term “ecological significance” to the indicator will generate a lot of disagreement about what “ecological significance” means. Also, the same logic and term could be applied to all nonforested wetland features.</p>	<p>Indicator 3.2.4: The “ecological significance” modifier should be dropped to read: "Identification and protection of nonforested wetlands, such as bogs, fens, vernal pools, and marshes".</p>
<p>Indicator 4 - Without clear definitions references to vernal pools is confusing and will not be consistently measured. More detail information is needed, as well as defining what makes a vernal pool "ecologically significant". Recommend that either it be defined in the objective or defined in the definition section.</p>	<p>See note rationale above for recommendations of proposed new language.</p>
<p>4. vernal pools of ecological significance seems too vague, need to define - are these mapped by state or federal agencies, or is the forester supposed to make this determination</p>	<p>[protection of...] vernal pools identified and mapped by state, provincial or federal agencies as being of ecological significance.</p>
<p>The new terminology associated with indicator 4 (i.e. ecological significance) poses a concern for me with respect to vernal pools. The term "vernal pool" has not been defined in the glossary section of the Standard. Vernal pools are defined by the Wikipedia as being also called ephemeral pools, are temporary pools of water. They are devoid of fish, and thus allow the safe development of natal amphibian and insect species. In BC, it is not within my scope of practice as a registered professional forester to determine the</p>	<p>I propose defining vernal pools in the glossary section of the SFI Standard. In addition, releasing some information in the interpretations that accompany the standard on who to determine ecological significance of a vernal pool.</p>

<p>ecological significance of a vernal pool. Thus, I would most likely have rely on the expertise of a qualified resource professional such as a biologist. Due to the number of vernal pools within my operating area, hiring a biologist to assess each one would have large financial implications. I understand that there are some rather large vernal pools in different states of the US that are protected and are deemed ecologically significant. I have not seen any information in BC about ecologically significant vernal pools.</p>	
<p>"Vernal pools of ecological significance" is not clearly defined.</p>	<p>Include a definition for "vernal pools of ecological significance" or take it out completely.</p>
<p>There needs to be a clear definition of vernal pool including a minimum size before committing members to identification and protection. "Of ecological significance" is subjective and should be clarified.</p>	
<p>Throughout North America there are several different terminologies and classification systems that can describe the same non-forested wetland feature. To avoid making the objective territorial, we recommend deleting specific references to the non forested wetland. Please note that the removal of the references to specific features will not change the overall meaning. However, the Indicator should retain the reference to size for some practical guidance and substance to ecological significance while also constraining the scope of bogs etc. It may be worthwhile to specify that harvested and regenerating wetlands shall be considered forested.</p>	
	<p>Add "rivers" before "streams" in #1, 2, and 3. Change #4 to "Program for identifying and protecting nonforested..."</p>
<p>This comment did not relate only to vernal pools, but ecologically important wetlands, including non-forested wetlands (e.g., bogs fens, marshes, vernal pools, etc.) and forested wetlands.</p> <p>It is good that language around ecological importance has been added to the standard. This should also apply to ecologically important forested wetlands.</p>	

Use this space to propose any new Indicators to Performance Measure 3.2:

Please use this space to propose any additional Performance Measures and Associated Indicators for Objective 3

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 fauna.

Rationale for proposed change:	Proposed New Language:
<p>The term "Forests with Exceptional Conservation Value" is used throughout the new standard. In Objective 4 PM 4.1 and 4.2 and in Objective 8 PM 8.1. I recognize that you are trying to take into account plant communities which are critically imperilled or imperilled, however the use of the word forests may be confusing and or misleading. NatureServe uses the term Ecological Communities and Systems, perhaps in place of "Forests with Exceptional Conservation Values we can use the term "Ecological Communities with Exceptional Conservation Values" as this is more consistent with the NatureServe Explorer Data Search Functions.</p>	<p>Conservation of Biological Diversity including Ecological Communities with Exceptional Conservation Value . To manage the quality and distribution of wildlife habitats and contribution 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 fauna.</p>
<p>Concern: This is an example of duplicate and excessive wording. Recommendation: State "at stand and landscape levels" in the Objective 4</p>	<p>Recommendation: State "at stand and landscape levels" in the Objective 4 statement, but do not repeat it in PM 4.1 and again in Indicator 1. Since it is</p>

<p>statement, but do not repeat it in PM 4.1 and again in Indicator 1. Since it is clearly mentioned within the Objective 4 statement it is implicitly applicable to the PM and Indicator(s).</p>	<p>clearly mentioned within the Objective 4 statement it is implicitly applicable to the PM and Indicator(s).</p>
<p>While the current wording helps protect any remaining critical habitat or communities, and there is discussion of addressing old growth issues within regions, there are no requirements for companies to contribute to even a minimum level of restoration of critical habitat or communities. Once a company has lands in an intensive management system, it can keep those lands in this condition even if species or communities are continuing to decline in the landscape because of lack of habitat or communities that have dropped below critical levels. Additional language is needed that holds a company responsible for contributing within a defined landscape to a minimum level of representation of all native ecosystems (flora and fauna). The contribution could be based on the percentage of forest ownership of the company within a HUC, perhaps of the same size as discussed above. How to define native ecosystem diversity and minimal levels of representation will probably meet substantial resistance, as will the notion of requiring restoration on private lands in landscapes where past practices have eliminated or reduced to very low levels certain native ecosystems. However, by making the level of representation at the landscape scale, companies can contribute either through restoration on their own lands, or through restoration on other public or private lands. They could meet restoration requirements through partnerships with public land agencies, or by providing for off-site restoration on other private lands if they didn't want to produce the needed conditions on their own lands. An off-site measurement system to assure appropriate restoration is accomplished could be put into place, based on XXXXX's performance measures technical report.</p> <p>Stands are not ecological units in the sense used in this section of the document. They are often treated as such, but since age is a determinant in</p>	<p>Add "and flora" to end.</p>

<p>the definition of a stand they are hard to model as ecological units. Ecological Land Classification recognizes ecosites and ecoelements as the lowest level in the spatial classification hierarchy.</p>	
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<p>Performance Measure 4.1. Program Participants shall have programs to promote biological diversity at stand and landscape levels.</p> <p>Indicators:</p>	
<p>Rationale for proposed change:</p>	<p>Proposed New Language:</p>
<p>Concern 4.1: All program participants can influence biological diversity at the stand level. However, depending on the size, configuration, and distribution of its landholdings, a number of program participants can only marginally influence biodiversity at the landscape level.</p>	<p>Recommendation 4.1: "Program Participants shall have programs to promote biological diversity at stand level and at a landscape level appropriate to the size and scale of the forest operation."</p>
<p>All program participants can influence biological diversity at the stand level. However, depending on the size, configuration, and distribution of its landholdings, a number of program participants can only marginally influence biodiversity at the landscape level.</p>	<p>"Program Participants shall have programs to promote biological diversity at a stand level and at a landscape level appropriate to the size and scale of the operation."</p>
<p>in 4.1.4, the word "elements" following wildlife habitat is undefined. Also under 4.1.4, please consider changing the "and" nest trees to "or" nest trees. "and" tends to make an auditor think this is an inclusive list which conflicts with the opening "such as".</p>	<p>Also under 4.1.4, please consider changing the "and" nest trees to "or" nest trees.</p>

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

Rationale for proposed change:	Proposed New Language:
<p>Indicator 5 ends with "where practical and when consistent with management objectives". This clause has the effect of nullifying the requirement. The indicator is essentially voluntary and should either be removed or made mandatory. Further, not having a requirement for landscape-level management will ensure that the LEED standard will not recognize SFI. We are not fooling anyone with the current wording.</p>	<p>Remove the phrase "where practical and when consistent with management objectives".</p>
<p>pollinator habitat not understood or well defined</p>	<p>drop pollinator habitat</p>
<p>Indicator 4.1.4: Retention for the purpose of maintaining wildlife habitat is noted in the indicator. It would be more complete if it also mentioned retention for the purpose of maintaining the diversity of species at the stand level. Also, drop the term "best" before "scientific information" because of different interpretations as to what is the "best scientific information."</p>	<p>Indicator 4.1.4: "Development and implementation of criteria, for conventional and, where applicable, bioenergy feedstock harvesting, as guided by regionally appropriate best scientific information, for retention of stand-level wildlife habitat elements (such as snags, stumps, mast trees, pollinator habitat, down woody debris, den trees, and nest trees), and for maintenance of diversity of tree species."</p>
<p>Indicator 4. Conservation of "pollinator habitat" arguably a national issue, but one most often associated with agricultural systems. The existing SFI requirements for stand- and landscape-level diversity sufficiently address forestry's contribution to the conservation of pollinator habitat. Recommend removing "pollinator habitat".</p>	<p>4. Development and implementation of criteria, for conventional and, where applicable, bioenergy feedstock harvesting, as guided by regionally appropriate best scientific information , for retention of stand-level wildlife habitat elements such as snags, stumps, mast trees, down woody debris, den trees, and nest trees.</p>
<p>The term "Forests with Exceptional Conservation Value" is used throughout the new standard. In Objective 4 PM 4.1 and 4.2 and in Objective 8 PM 8.1. I recognize that you are trying to take into account plant communities which are critically imperiled or imperiled, however the use of the word forests may be confusing and or misleading. NatureServe uses the term Ecological Communities and Systems, perhaps in place of "Forests with Exceptional Conservation Values we can use the term "Ecological Communities with Exceptional Conservation Values" as this is more consistent with the NatureServe Explorer Data Search Functions.</p>	<p>Indicator 3. Plans to locate and protect known sites associated with viable occurrences of critically imperiled and imperiled species and communities also known as Ecological Communities with Exceptional Conservation Value. Plans for protection may be developed independently or collaboratively and may include Program Participant management cooperation with other stakeholders, or use of easements, conservation land sales, exchanges, or other conservation strategies.</p>

<p>Indicator 4 - Again making distinctions between conventional and bioenergy feedstock harvesting is redundant and unnecessary.</p>	<p>Indicator 4 -for conventional harvesting, as guide by regionally appropriate.....</p>
<p>Performance Measure 4.1, Indicator #3: Describing either a species or an ecological community as a 'Forest' with Exceptional Conservation Value is a misnomer and it is a concern that it will result in a wide range of interpretations of protection requirements. Protection of ecological communities is normally achieved at a small stand level scale whereas a 'forest' can be expanded out to the landscape or regional level. Requirements to protect sessile or immobile species will normally require protection at a small stand scale, not a forest per se. Species having large ranges will likely only require protection of habitat key their life cycle at locations scattered across the landscape to in order to ensure their continued survival. Again, protection of a 'forest' would not be necessary as exclusion of harvesting in a 'forest' is usually not necessary to protect a species.</p>	<p>Delete all references in the draft standard to 'Forests with Exceptional Conservation Value'</p> <p>OR</p> <p>change to 'Species and Ecological Communities having Exceptional Conservation Value'.</p> <p>Also, for clarity and consistency with the Nature Serve conservation status the word 'ecological' needs to be added before community in the indicator; ".....known sites associated with viable occurrences of critically imperiled and imperiled species and ecological communities....."</p>
<p>Indicator 4.1.4 – remove phrase “pollinator habitat” – out of left field new indicator with little science supporting what essential components are for that habitat in many parts of the US and Canada</p>	<p>Development and implementation of criteria, for conventional and, where applicable, bioenergy feedstock harvesting, as guided by regionally appropriate best scientific information , for retention of stand-level wildlife habitat elements such as snags, stumps, mast trees, down woody debris, den trees, and nest trees.</p>
<p>Indicator #3. A focus on sites through the FECV concept does not address biodiversity conservation concerns linked to large intact natural forests areas.</p>	<p>Recommend expanding definition of FECV to include large intact natural forest areas (forest areas where many of the principal characteristics and key elements of native ecosystems such as complexity, structure and diversity are present).</p>
<p>Pollinator Habitat is not a defined or widely understood habitat</p>	<p>Strike "pollinator habitat"</p>
<p>Indicator 4: Same comment as previous with respect to the term "conventional".</p>	
<p>Concern 4.1.1:</p>	<p>Recommendation 4.1.1: “Program to promote the conservation of biological</p>

<p>Concern: "ecological or natural community types" is not defined. Also, "at stand and landscape levels" is redundant since it is stated in the PM.</p> <p>Concern 4.1.3:</p> <p>Concern: Too wordy – it is up to the program participant to get innovative and build there own auditable defense with respect to what collaboration might entail.</p> <p>Concern 4.1.5:Concern: Confusing wording & too many caveats.</p>	<p>diversity, including species, wildlife habitats and community types."</p> <p>Recommendation 4.1.3: Cut sentence off at the word collaboratively. (i.e. remove "and may include...")</p> <p>Recommendation 4.1.5: "Assessment of forest cover types and habitats at the stand level with findings incorporated into management planning and operations where practical."</p>
<p>The term "pollinator habitat" is unclear (Indicator 4).</p>	<p>Define "pollinator habitat".</p>
<p>There is no benefit in distinguishing between the different harvesting types.</p>	
<p>"Pollinator habitat" is a broad and undefined term. The Indicator references "stand level habitat elements"; we should not add every possibility as examples.</p>	<p>We recommend it be deleted.</p>
<p>Indicator 3 starts with "Plans to". This could be interpreted as "a plan to do something" rather than an actional item. Perhaps at the stage of the standard it would be better expressed as a "program to"...</p>	<p>3. Program to locate and protect known sites associated with viable occurrences of critically imperiled and imperiled species and communities also known as Forests with Exceptional Conservation Value. Plans for protection may be developed independently or collaboratively and may include Program Participant management, cooperation with other stakeholders, or use of easements, conservation land sales, exchanges, or other conservation strategies.</p>
<p>4. Pollinator habitat is not defined -- is this insect related or mast producing related?</p>	<p>4. Eliminate pollinator habitat.</p>
<p>Due to the use of the terms critically imperiled and imperiled at the state level sometimes, it is confusing in indicator #3 what these terms actually mean.</p> <p>I am unfamiliar with the appropriate scientific definition of "pollinator habitat."</p>	<p>Indicator 3-simply put G1 and G2 in parentheses after the appropriate terms.</p> <p>Indicator 4 remove pollinator habitat</p>

<p>It should be defined in the definitions, does it apply to milkweed on roadsides, natural meadows, flowering trees, seeded landings, etc</p>	
<p>Regarding #5, with concern about early and late successional habitats, it is important to have an idea of the size class distribution of forest cover types that exist within an ownership so that it can be compared to regional biological diversity models. The phrase “and when consistent with management objectives” could be an unnecessary loophole to avoid developing a strategy to promote biological diversity when gaps are identified.</p>	<p>Add “size classes” after “cover types.” Delete “and when consistent with management objectives.”</p>
<p>Vulnerable species and communities (NatureServe G3) 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. Having programs to conserve stand and landscape-level biodiversity is not specific enough to get at this issue.</p>	<p>Suggested to remove the phrase “where practical and when consistent with management objectives” or “consider the results” in two locations-landscape assessments and conservation planning.</p>

Use this space to propose any new Indicators to Performance Measure 4.1:

<p>Performance Measure 4.2. Program Participants shall apply knowledge gained through research, science, technology, and field experience to manage wildlife habitat and contribute to the conservation of biological diversity.</p>	
<p>Rationale for proposed change:</p>	<p>Proposed New Language:</p>
	<p>Performance Measure 4.2 . Recommend including stakeholder consultation as</p>

	a source of knowledge.
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Indicators:

1. Collection of information on Forests with Exceptional Conservation Value and other biodiversity-related data through forest inventory processes, mapping, or participation in external programs, such as NatureServe, state or provincial heritage programs, or other credible systems. Such participation may include providing nonproprietary scientific information, time, and assistance by staff, or in-kind or direct financial support.
2. A methodology to incorporate research results and field applications of biodiversity and ecosystem research into forest management decisions.
3. Collection of information, individually or collaboratively, on climate change impacts on wildlife habitats and conservation of biological diversity through international, national, regional or local programs.

Rationale for proposed change:	Proposed New Language:
#1 and #3 "Collection of information" will be problematic with auditors	Relevant information
"Collection of information" needs interpretation. May create "busy-work" for biologists.	Substitute "monitor" or "involvement in processes"
Ind 3. is a job for a librarian.	Drop indicator.
Indicator 4.2.3: Wording is inappropriate. Insert the qualifier "possible" between "on" and "climate change impacts"	Indicator 4.2.3: "Collection of information, individually or collaboratively, on possible climate change impacts on wildlife habitats and conservation of biological diversity through international, national, regional or local programs."
Indicator 3. "Collection of information" is a difficult concept to audit. Recommend using language similar to proposed indicator 17.1.5 where the	Indicator 3. Program Participants are knowledgeable about climate change impacts on wildlife habitat and conservation of biological diversity. Such

<p>phrase "Program Participants are knowledgeable about" is used.</p>	<p>knowledge may be generated individually or collaboratively through international, national, or local initiatives.</p>
<p>The term "Forests with Exceptional Conservation Value" is used throughout the new standard. In Objective 4 PM 4.1 and 4.2 and in Objective 8 PM 8.1. I recognize that you are trying to take into account plant communities which are critically imperiled or imperiled, however the use of the word forests may be confusing and or misleading. NatureServe uses the term Ecological Communities and Systems, perhaps in place of "Forests with Exceptional Conservation Values we can use the term "Ecological Communities with Exceptional Conservation Values" as this is more consistent with the NatureServe Explorer Data Search Functions.</p>	<p>Indicator 1. Collection of information on Ecological Communities 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 nonproprietary scientific information, time, and assistance by staff, or in-kind or direct financial support.</p>
<p>Performance Measure 4.2, Indicator #3: This indicator appears to require program participants to take the initiative to start the collection of information on effects of climate change where no such program already exists for a program participant's region of operation. Climate change research already falls under the umbrella of Indicator #1 so it is unclear why a separate indicator is required to address one of many areas of scientific research that a program participant can choose to participate in.</p>	<p>Delete Indicator #3</p>
<p>Indicator 4.2.3 - Delete this new indicator (4.2.3) as "collection of information..." does nothing tangible in terms of the ground management or in fact promotion of sustainable forestry.</p>	<p>Delete Indicator 4.2.3</p>
<p>I am very concerned about what could be required to meet indicator 3. Forest companies do not have the resources in these economic times to fund such a collection program. I think this should be done as part of governmental research when and where wildlife habitats and biodiversity are negatively affected. Forest companies should then consider, when it is available, all government collected information in their forest management decisions.</p>	<p>I would incorporate climate change impacts into indicator 2 and remove indicator 3. This way if any research information is available from governments it will get considered in forest management decisions and not just collected.</p>
<p>How will indicator 3 be applied to Program Participants were the is currently no program in place to collect information on climate change impacts on wildlife habitat. With the state of the forest industry and the economic</p>	<p>Suggest adding "where applicable" to the end of Indicator 3.</p>

downturn, this would be a very costly venture for any company to undertake.	
Concern 4.2.3: Concern: A specific indicator related to climate change is unnecessary. Gathering of this information is implied in Indicators 1 & 2 for this PM.	Recommendation 4.2.3: Delete this newly added indicator related to climate change.
Including items like “long-term drought” and “climate change” to assess impacts on wildlife habitats and conservation of biological diversity implies a level of sophistication that doesn't exist. Model based predictions are still changing fairly regularly and similar models don't always give similar results. This would cause frequent shifting in forest planning efforts and would probably appear very inconsistent.	This performance measure should be deleted.
Perhaps a suggestion that the SICs may be a clearing house for information on climate change.	
isn't 4.2.3 covered by 2.4.4 ? Is it needed here too?	Delete 4.2.3 as a duplication of 2.4.4
Given that Objective 1 asks us to consider this in our management plans isn't indicator 3 above somewhat redundant. Also given the debate in the scientific community and the infancy of the research, this seems premature.	Remove indicator 3
There are few examples of inventories that have a wide enough range of ecological values that they can be used in the ways described in section 4.2. Forest management inventories (the definition below implicitly includes management objectives) are often incomplete. This information is usually derived from scientific studies and other external programs – participation in a range of activities should be encouraged.	
HCFV does not need to be the precise term used by SFI even though it is now being used by multiple standards outside of the forestry realm. The way FECV	Adopt High Conservation Value Forest definition, criteria and indicators

<p>is currently defined by SFI limits the scope to a stand-level conservation concept. There needs to be specific landscape, or coarse-scale, biodiversity indicators in the SFI standard. Otherwise it will continue to be very difficult to point to any tangible landscape-scale conservation results as a result of SFI.</p>	
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<p>Use this space to propose any new Indicators to Performance Measure 4.2:</p>
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<p>Please use this space to propose any additional Performance Measures and Associated Indicators for Objective 4</p>
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<p>Objective 5. Maintenance of Visual Quality and Recreational Benefits. To manage the visual impact of harvesting and other forest operations.</p>	
<p>Rationale for proposed change:</p>	<p>Proposed New Language:</p>
<p>Poppycock</p>	
<p>Concern 5: Too wordy</p>	<p>Recommendation 5: Simplify wording: "To manage the visual impact of forest operations."</p>
<p>Clarify visual quality applies to forest operations and expand objective to include recreation.</p>	<p>Objective 5. Maintenance of Visual Quality and Recreational Benefits. To manage the visual impact of forest operations and provide recreational opportunities for the public.</p>
<p>Stated previously that elevating recreational benefits to the Objective level</p>	<p>Either remove Recreational benefits or in the description alter to say "..manage</p>

does not seem appropriate.	the visual and recreational impact of harvesting...."
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Performance Measure 5.1. Program Participants shall manage the impact of harvesting on visual quality.	
Rationale for proposed change:	Proposed New Language:
The owner needs to use "best business practices" consistent with SFI. They shouldn't have to be concerned about the visual affect as it is PURELY subjective and he may think clearcuts are beautiful as it is the best for his land, healthwise and profit wise.	
Still potentially viewed as weak, recomend additions of Regionally accepted.	See Indicator 1.

<p>Indicators:</p> <ol style="list-style-type: none"> 1. Program to address visual quality management. 2. Incorporation of aesthetic considerations in harvesting, road, landing design and management, and other management activities where visual impacts are a concern.

Rationale for proposed change:	Proposed New Language:
Visual "considerations" should not be a part of a renewable resource management. We are managing a resource for the protection of the planet.	
Strengthen Objective 5.	1. Program to address visual quality management, to levels acceptable or in exceedance with regionally accepted norms.

Use this space to propose any new Indicators to Performance Measure 5.1:
The first indicator should be the establishment of a set of visual quality management objectives for the ownership in the plan.

Performance Measure 5.2. Program Participants shall manage the size, shape, and placement of clearcut harvests.	
Indicators:	
1. Average size of clearcut harvest areas does not exceed 120 acres (48.6 hectares), except when necessary to meet regulatory requirements or to respond to forest health emergencies or other natural catastrophes.	
2. Documentation through internal records of clearcut size and the process for calculating average size.	
Rationale for proposed change:	Proposed New Language:
An effective visual quality management program eliminates the need to specify an arbitrary maximum average clearcut size. Forest health and natural	5.2.1 Visual quality management program addresses the size, shape, and placement of clearcut harvests.

<p>disasters are always going to play a part in forest ecosystems and forest management.</p>	
<p>Clearcuts should not be limited by SFI. If it clearcutting is good management of the land, a hypothetical limit of 120 acres is counter productive.</p>	
<p>Often larger harvest units are developed to mimic natural disturbance patterns and regimes. Unsure if these are always captured under "regulatory requirements"</p>	<p>add "or other biodiversity planning" requirements</p>
<p>Southeast and South-Central Alaska typically have long periods of high winds and extreme rainfall. Further, the softwoods in Southeast and South-Central Alaska are shallow rooted and very susceptible to windthrow (particularly when the soils are saturated). As a consequence, the cutting boundaries are normally located along stream buffers or natural windfirm boundaries. These conditions may not always allow compliance with the 120 acre average size clear-cut limitation.</p> <p>Further, most of the timber harvest in these regions is done by cable logging systems. If timber is isolated behind a cutting boundary, the cost of harvesting that timber in the future, whether or not it has blown down, can be prohibitively expensive.</p>	<p>Average size of clearcut harvest areas does not exceed 120 acres (48.6 hectares), except when necessary to meet regulatory requirements or to respond to forest health issues (e.g. creating a significant risk of windthrow) or other natural catastrophes.</p>
<p>Placement of these indicators in this objective implies that they only apply where visual management is a concern. In BC there are areas designated as non-visually sensitive.</p>	<p>Consider moving indicators to objective 4 or 18></p>
<p>Concern 5.2: This is a valuable performance measure that addresses more than visual quality. In Canada the clearcut size, shape, location and landscape configuration is primarily driven by sustainability criteria, ecological factors, emulating natural disturbance patterns and wildlife management, rather than exclusively visual aesthetics. Visual aesthetics tend to be addressed on a site specific basis in response to localized need i.e. highway corridors, tourism values, etc.</p>	<p>Recommendation 5.2: The standard needs to project an appreciation for the importance of well planned, appropriately sized harvest blocks in response to the myriad of environmental considerations. Needs further thought and consideration -- Suggest it could be a performance measure under forest management planning.</p>

<p>Concern 5.2.1: Larger clear cuts can be the appropriate prescription required by professionals in order to achieve sustainable forest management, for example to sustain threatened and endangered species, especially in the Canadian context (i.e. caribou). Consideration should be given to landscape level management and with Canadian input.</p>	<p>Specifically: “manage” may be better served by “plan” – this is a planning issue “placement” may be better served by “location” or “configuration”</p> <p>Recommendation 5.2.1: “Within visually sensitive zones the average clear cut size shall not exceed 120 acres, unless “harvesting is being carried out to recover timber damaged by fire, insects, wind, and/or other similar events, incorporating structural characteristics of identified natural disturbances types associated with the landscape, and/or necessary to meet regulatory requirements..”</p>
<p>Average size of clearcut harvest areas is too small.</p>	<p>Average size of clearcut harvest areas does not exceed 250 acres, except when necessary to meet regulatory requirements or to respond to forest health emergencies or other natural catastrophes.</p>
<p>During past revision, efforts have been made to use terminology that applies equally in the U.S. and Canada. If that is not possible, every effort has been made to recognize the practices and terms of both countries. We recommend that Indicator 5.2.1 be modified to reflect this philosophy by using as examples of natural disturbances taken from Canadian forest practice regulations.</p>	<p>We recommend adding at the end of the indicator the following: “..., including harvesting carried out to recover timber damaged by fire, insects, wind, and/or other similar events, incorporating structural characteristics of identified natural disturbance types associated with the landscape.”</p>
<p>This indicator worked OK in the US with its forest types and populations. In the boreal forest it is not appropriate where small clearcuts are not in tune with the natural disturbance regimes. The Crown manages for moose in the southern portion of the boreal forest calling for an average CC size of 100 ha with retention. The Crown also follows the Natural Emulation Disturbance Pattern Guidelines which also have larger clearcuts. Finally, round up to 49 ha. There is no science behind the 120 acres limit, it was just a consensus arbitrary figure.</p>	<p>Indicator 1- does not exceed 120 acres (49 hectares), except when necessary to meet regulatory requirements, address scientifically accepted disturbance regimes or to respond to forest health emergencies...”</p>
<p>1. Unnecessarily restrictive 120 acre cc size. There are several legitimate situations to exceed 120 ac that would be harmfully precluded by this language. This one-size-fits-all needs a better written caveat.</p>	

Delete indicator 5.2.1. See discussion from Minneapolis workshop for rationale.	
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Use this space to propose any new Indicators to Performance Measure 5.2:
ADD 2. At times, clearcut harvest size may legitimately exceed 120 acres to achieve planned and legally-authorized purposes, including but not limited to: a) biodiversity objectives; b) social & community objectives (e.g. Alaskan islands); c) research projects approved by local government; d)invasive species control; e) stand destroying catastrophies; f) forest health epidemics & emergencies; g) other special plans approved by local government.

Performance Measure 5.3. Program Participants shall adopt a green-up requirement or alternative methods that provide for visual quality.	
Rationale for proposed change:	Proposed New Language:
This performance measure specifically defines the gree-up requirement. It does not allow the program participant to specify a green-up requirement that fit the ecosystems in which they manage.	See proposed definition of Green-Up requirement.
Again, poppycock	
Is the green up requirement intended only for visually sensitive areas? If not move pm to obj 4.	Consider moving pm and indicators to obj 4.
Metrics should be included throughout. Also divide #2 into two sentences – too hard to read. What is the basis for #3? In many areas of the boreal forest and with softwoods such as black spruce more than 3 years are required for green-up. Why not just include a height requirement?	remove "at least 3 years" from #3

<p>Indicators:</p> <ol style="list-style-type: none"> 1. Program implementing the green-up requirement or alternative methods. 2. Harvest area tracking system to demonstrate compliance with the green-up requirement or alternative methods. 3. Trees in clearcut harvest areas are at least 3 years old or 5 feet high at the desired level of stocking before adjacent areas are clearcut, or as appropriate to address operational and economic considerations, alternative methods to reach the performance measure are utilized by the Program Participant. 	
Rationale for proposed change:	Proposed New Language:
Is this best for the land and planet or for someones idea of what "looks pretty"?	
Indicator 5.3.3: It does not make any sense for this indicator to apply to single digit acre stands. There needs to be a minimum clearcut size (for example, 10 ac for individual harvest areas or 40 acres of combined small clearcuts) below which the green-up issue doesn't apply. At the very least the green-up requirement should not apply to clearcuts that meet the exceptions described in 5.2.1.	Indicator 5.3.3: "When adjacent clearcut areas total 40 acres or greater, trees in clearcut harvest areas are at least 3 years old or 5 feet high at the desired level of stocking before adjacent areas are clearcut. Alternative methods to reach the performance measure may be utilized by the Program Participant in order to address operational and economic considerations, or other resource issues such as protection or enhancement of rare and endangered species."
Delete indicator 5.3.3. Replace with new indicator that allows green up requirements to be established by forest land manager. Rationale; green up or reforestation varies from region to region. Additionally, states may have guidelines in place that define green up requirements. In MN for example, the	

visual quality guidelines could be used to develop a green up requirement locally.	
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Use this space to propose any new Indicators to Performance Measure 5.3:

Performance Measure 5.4. Program Participants shall provide recreation opportunities for the public.	
Rationale for proposed change:	Proposed New Language:
The draft standard indicates that this was previously an indicator in Objective 12 in 2005 - 2009 SFI Standard. The 2005-2009 standard states "Program participants shall support and promote..." The draft standard requires the program participant to provide recreational opportunities for the public. However, no definition for recreational opportunities, nor the expected level a program participant must achieve to meet the standard.	Program participants shall support and promote recreation opportunities for the public.
Why. This is their land! Why should they be forced to allow others to use it.	Delete it
Providing recreational opportunities is not directly within our mandate or control, rather it is the direct mandate of other govt Ministries. Our activities such as harvesting and road building may indirectly provide opportunities for some times of recreation.	
The wording between Performance Measure 5.4 and Indicator 5.4.1 is inconsistent. The performance measure reads that Program Participants "shall provide" while the Indicator reads that Program Participants shall provide	Program Participants shall consider providing recreation opportunities for the public.

recreation opportunities where it is consistent with management objectives.	
Concern: Requiring program participants to provide recreation opportunities may be inconsistent with the forest management objectives.	Recommendation: Replace the word “provide” with “consider”. Suggest: “Program Participants shall consider recreation opportunities for the public.”
<p>The wording between Performance Measure 5.4 and Indicator 5.4.1 is inconsistent. The performance measure says the participant “shall provide” while the Indicator says that the participant shall provide where its consistent with management objectives.</p> <p>Also, there are more and more occurrences of the public being destructive to the land.</p>	<p>Program Participants shall consider providing recreation opportunities for the public.</p>
<p>The performance measure (PM) uses the mandatory “shall.” The PM then has one indicator, where the PM is repeated, but qualified. This creates a fundamental ambiguity and must be corrected as follows. First, “shall” must be replaced by “should.” Second, if drafting guidelines allow, the indicator should be deleted.</p>	<p>“Program Participants should provide recreation opportunities for the public, where consistent with forest management and public safety objectives.”</p>

<p>Indicator:</p> <ol style="list-style-type: none"> 1. Provide recreation opportunities for the public, where consistent with forest management objectives. 	
<p>Rationale for proposed change:</p>	<p>Proposed New Language:</p>

Recreation opportunities is a broad term that will be difficult to measure conformance. Auditors will have to be subjective when evaluating whether program participant has met this indicator.	Support and promote recreation opportunities for the public, where consistent with forest management objectives.
Again, it is the owners land, not the publics.	Delete it
Concern: the indicator should allow conditionality of economic considerations to recreation opportunities	Recommendation: Add “and economic considerations” to the end of the sentence.
The performance measure (PM) uses the mandatory “shall.” The PM then has one indicator, where the PM is repeated, but qualified. This creates a fundamental ambiguity and must be corrected as follows. First, “shall” must be replaced by “should.” Second, if drafting guidelines allow, the indicator should be deleted.	“Program Participants should provide recreation opportunities for the public, where consistent with forest management and public safety objectives.”

Use this space to propose any new Indicators to Performance Measure 5.4:

Please use this space to propose any additional Performance Measures and Associated Indicators for Objective 5

Objective 6. Protection of Special Sites. To manage Program Participant lands that are ecologically, geologically, historically, or culturally important in a manner that recognizes their special qualities.

Rationale for proposed change:	Proposed New Language:
<p>Concern: Unnecessary wording: “Program Participant lands” is referenced in the Intro and does not need to be repeated in this Objective statement (Objective 6 is the only one using this phrase). The Intro states clearly that Objectives 1 thru 7 apply to land which is owned or controlled by the participant.</p>	<p>Recommendation: “To ensure sites that are ecologically, geologically, historically or culturally important are identified and managed in a manner that recognizes their special qualities.”</p>
<p>This objective uses the definition of “special sites” without using the defined term itself, thus creating confusion. This language should be modified to merely reference special sites and drop the references to “ecologically, geologically, historically and culturally important.”</p> <p>If it is felt necessary to retain the specific references, the word “historical” should be dropped as it is covered by the reference to “cultural.”</p>	<p>“To manage special sites on Program Participant lands in a manner that recognizes their special qualities.”</p>

<p>Performance Measure 6.1. Program Participants shall identify special sites and manage them in a manner appropriate for their unique features.</p>	
Rationale for proposed change:	Proposed New Language:
<p>If this stays, SFI should pay them for the cost to do this!</p>	<p>All costs for the Protection of Special Sites are paid for by SFI</p>
<p>This objective uses the definition of “special sites” without using the defined term itself, thus creating confusion. This language should be modified to merely reference special sites and drop the references to “ecologically, geologically, historically and culturally important.”</p>	<p>“Use of existing natural heritage data and expert advice in identifying or selecting special sites for protection.”</p>

<p>If it is felt necessary to retain the specific references, the word “historical” should be dropped as it is covered by the reference to “cultural.”</p>	
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<p>Indicators:</p> <ol style="list-style-type: none"> 1. Use of existing natural heritage data and expert advice in identifying or selecting sites for protection because of their ecologically, geologically, historically, or culturally important qualities. 2. Appropriate mapping, cataloging, and management of identified special sites.

Rationale for proposed change:	Proposed New Language:
<p>problem with "and" expert advice. Implies that we must have expert advice.</p>	<p>I prefer "and/or"</p>
	<p>Indicator 6.1.1. Recommend including stakeholder consultation as a source of knowledge</p>
<p>This needs to be validated by the entity through documentation of correspondence or results or reports. Natural heritage data is not enough and “expert advice” is too vague. How is expertise defined? Something more specific is needed on the cultural side of things, in particular.</p>	<p>Add “Documented” to beginning, before “use”</p>

Use this space to propose any new Indicators to Performance Measure 6.1:

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Please use this space to propose any additional Performance Measures and Associated Indicators for Objective 6

Objective 7. Efficient Use of Forest Resources. To promote the efficient use of forest resources.	
Rationale for proposed change:	Proposed New Language:

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.	
Rationale for proposed change:	Proposed New Language:
The performance measure requires us to be prescriptive of technology rather than of results.	‘Program Participants shall keep abreast of forest harvesting technologies and “in-woods” manufacturing processes and practices to be aware of, encourage, and achieve minimal waste and efficient utilization of harvested trees where appropriate and consistent with other SFI Standard objectives.’

<p>The term “in-woods” is not necessary.</p>	<p>Program Participants shall employ appropriate forest harvesting technology and manufacturing processes and practices to minimize waste and ensure efficient utilization of harvested trees, where consistent with other SFI Standard objectives.</p>
<p>do we have a conflict here in minimizing waste vs leaving some material on ground. How will we be measured here vs 2.3.4?</p>	
<p>Concern: Too wordy.</p>	<p>Recommendation: “Program Participants shall employ appropriate forest technology and Best Management Practices to ensure efficient utilization and minimize waste.”</p>
<p>The term “in-woods” is not necessary.</p>	<p>Program Participants shall employ appropriate forest harvesting technology and manufacturing processes and practices to minimize waste and ensure efficient utilization of harvested trees, where consistent with other SFI Standard objectives.</p>

<p>Indicator:</p> <ol style="list-style-type: none"> 1. Program or monitoring system to ensure efficient utilization, which may include provisions to ensure <ol style="list-style-type: none"> a. residue management considers economic, social, environmental factors (e.g. organic and nutrient value to future forests) and other utilization needs; b. training or incentives to encourage loggers to enhance utilization; c. cooperation with mill managers for better utilization of species and low-grade material; d. Exploration of markets for underutilized species and low-grade wood and alternative markets (e.g. bioenergy markets, carbon offsets); or

e. periodic inspections and reports noting utilization and product separation.	
Rationale for proposed change:	Proposed New Language:
The term “residue management” is unclear.	a. Management of harvest residue (e.g., slash, limbs, tops) shall consider economic, social, environmental factors (e.g. organic and nutrient value to future forests) and other utilization needs;
7.1.1 Change in language recommended for clarity, and to improve ability to provide credible audit evidence	Indicator 7.1.1 – We recommend this indicator be written as follows: “Program or monitoring system to ensure efficient utilization of wood and efficient and ecologically sound utilization of residuals. “
Concern: Indicator 1.a. is unclear; is residue management the same as biomass? Also, the term “social” is abstract and not commonly defined. This is not an auditable item.	Recommendation Indicator 1.a: Define “residue.” Then, “Management of residue to consider various utilization options.”
The term “residue management” is unclear. Also, in Indicator 1.d, this again refers to emerging science that is not well-developed enough to be included in the standard.	Define “residue management” or change the wording. “Landings left clean with little waste” was clear to foresters. d. Exploration of markets for underutilized species and low-grade wood and alternative markets; or
Exploration of markets is a much better phrase than development of markets however it should include the phrase “where economically feasible.”	
Attempting to audit “social factors” for residue management is not feasible, and the term is not commonly defined.	“Management of residue to consider various utilization options.”
d. needs to be re-worded. I do not understand use of carbon offsets in the context of efficient utilization of "harvested" trees.	d. Exploration of markets for underutilized and low-grade wood species (e.g. bioenergy markets, landscaping products, firewood, etc.); or

Use this space to propose any new Indicators to Performance Measure 7.1:

Please use this space to propose any additional Performance Measures and Associated Indicators for Objective 7

SFI Standard Objectives 8-13 for Procurement
 Procurement from sources within the United States and Canada (Objectives 8-10 apply).

 Objective 8. Landowner Outreach. To broaden the practice of sustainable forestry by forest landowners through procurement programs.

Rationale for proposed change:	Proposed New Language:
Enhance credibility of the standard	The word “procurement” should be changed to “Fiber Sourcing”. This change will allow more consistency throughout the standard as well as with the on product fiber sourcing label.
These objectives should use the term “procurement” or the term “fiber sourcing,” which ever is selected.	

Performance Measure 8.1. Program Participants shall provide information to landowners for reforestation following harvest, the use of BMPs, and for identification and protection of important habitat elements for wildlife, including Forests with Exceptional Conservation Value.	
Rationale for proposed change:	Proposed New Language:
Agreement are not always with landowners.	provide information to landowners or suppliers
Add biodiversity as an element to protect.	"...and protection of important habitat elements for wildlife and biodiversity, including Forests with Exceptional Conservation Value."
The term "Forests with Exceptional Conservation Value" is used throughout the new standard. In Objective 4 PM 4.1 and 4.2 and in Objective 8 PM 8.1. I recognize that you are trying to take into account plant communities which are critically imperriled or imperriled, however the use of the word forests may be confusing and or misleading. NatureServe uses the term Ecological Communities and Systems, perhaps in place of "Forests with Exceptional Conservation Values we can use the term "Ecological Communities with Exceptional Conservation Values" as this is more consistent with the NatureServe Explorer Data Search Functions.	Program Participants shall provide information to landowners for reforestation following harvest, the use of BMP's and for identification and protection of important habitat elements for wildlife, including Ecological Communities with Exceptional Conservation Value.
Concern - Entire sentence is of poor structure. The intent of this PM is not clearly stated.	Recommendation: Suggest: Program Participants shall provide information to landowners for: <ul style="list-style-type: none"> a. reforestation following harvest; b. the use of BMPs, c. identification and protection of important habitat elements for wildlife, including Forests with Exceptional Conservation Value.
This Performance Measure could be clarified by adding language from Objective 17: "information packets, websites, newsletters, workshops, tours, etc." The Performance Measure should also include additional indicators	This Performance Measure could be clarified by adding language from Objective 17: "information packets, websites, newsletters, workshops, tours, etc." The Performance Measure should also include additional indicators

found in 17.2: "periodic educational opportunities such as field tours...education trips, etc."	found in 17.2: "periodic educational opportunities such as field tours...education trips, etc."
<p>pm 8.1 - consider adding behind "shall" provide info to read--shall provide or make available through SICs, associations, or other groups...</p> <p>Reasoning is that "shall provide" can be interpreted as the participant must give it to the LO. While in the real world, we provide a supply of information to a school, a wood dealer, a loggers group and they will help distribute to those landowners they come into contact with.</p>	<p>In PM 8.1 change</p> <p>"shall provide information" to to read--</p> <p>"shall provide, or make available through SICs, associations, or other groups, information to landowners..."</p>

<p>Indicator:</p> <ol style="list-style-type: none"> 1. Program Participants shall supply regionally appropriate information or services to forest landowners, describing the importance and providing implementation guidance on <ol style="list-style-type: none"> a. BMPs; b. reforestation and afforestation; c. visual quality management; d. conservation of critical wildlife habitat elements, threatened and endangered species, and Forests with Exceptional Conservation Value; e. management of residue to consider economic, social, environmental factors (e.g. organic and nutrient value to future forests) and other utilization needs; f. invasive exotic plants and animals; and g. potential for special sites. 2. Encourage landowners to participate in forest management certification programs such as the American Tree Farm System.

Rationale for proposed change:	Proposed New Language:
#2 Only small landowners should be directed to ATFS	Encourage family forest landowners.....
Enhance credibility of the standard	<p>Objective 8.1: Program participants should have the same flexibility now given in Objective 17 to supply information via “information packets, websites, newsletters, workshops, tours, etc”. Specifically, Section 8.1 should include the same indicators of 17.2 (“periodic educational opportunities such as field tours,education trips, etc.)</p> <p>Objective 8.1.e: The indicator suggests that program participants would provide regionally appropriate information to forest landowners on the importance of “management of residue to consider economic, social, environmental factors....” This is not necessary as current outreach and materials provided address issues of forest management on a sustainable basis. There is no need to get more specific on considering economic, social and environmental factors.....those considerations are decisions that will be based on the landowners’ objectives.</p> <p>Objective 8.2: Rather than “encourage landowners to participate in forest management certification programs”, it would be less invasive to private property rights of family forest landowners to simply be supportive of forest management certification programs without a requirement to encourage participation directly to landowners. This objective should thus be re-written and moved to section 17 “Community Involvement in the Practice of Sustainable Forestry..”</p>
Indicator 2. Encouragement should be for participation in SFI, not simply ATFS.	2. Encourage landowners to participate in forest management certification

<p>However, if the intent here is to encourage small family landowners to participate in certification, then ATFS is appropriate.</p>	<p>programs such as SFI or American Tree Farm System.</p> <p>or</p> <p>2. Encourage small family landowners to participate in forest management certification programs such as American Tree Farm System.</p>
<p>The term "Forests with Exceptional Conservation Value" is used throughout the new standard. In Objective 4 PM 4.1 and 4.2 and in Objective 8 PM 8.1 and Indicator 1d. I recognize that you are trying to take into account plant communities which are critically imperiled or imperiled, however the use of the word forests may be confusing and or misleading. NatureServe uses the term Ecological Communities and Systems, perhaps in place of "Forests with Exceptional Conservation Values we can use the term "Ecological Communities with Exceptional Conservation Values" as this is more consistent with the NatureServe Explorer Data Search Functions.</p>	<p>Indicator 1 (d) Program Participants shall supply regionally appropriate information or services to forest landowners, describing the importance and providing implementation guidance on conservation of critical wildlife habitat elements, threatened and endangered species, and Ecological Communities with Exceptional Conservation Value.</p>
<p>Indicator 1f. lumped the 2 terms "invasive" and "exotic" together. These terms should be separated. An invasive species can be defined as any species not native to a particular ecosystem whose introduction causes, or is likely to cause, economic or environmental harm or harm to human health. An exotic species can be defined as species that have been moved beyond their natural range as a result of human activity. Exotic species are also known as alien species, foreign species, introduced species, non-indigenous species, and non-native species. Treating these 2 terms as one decreases the credibility of the standard.</p> <p>Also, suggest either removing Indicator 2 or add where applicable at the end. A Canadian SFI Participant is not going to encourage a landowner to certify to</p>	<p>separate out terms invasive and exotic.</p>

<p>the American Tree Farm System.</p>	
<p>Concern: Indicator 1. Wording can be simplified.</p> <p>Concern: Indicator 1.e. – “residue” is not defined (is it the same as “biomass?”). Also, the term “social” is abstract and not commonly defined.</p> <p>Concern: Indicator 1.g. - The word “Potential” is not definitive and is not auditable.</p>	<p>Recommendation Indicator 1: “Program Participants shall supply information and service to forest landowners, to promote:”</p> <p>Recommendation Indicator 1.e.: Define “residue.” Also, strike the word “social” in the list of factors relative to the management of residues. Suggest: “Management of residue to consider various utilization options.”</p> <p>Recommendation Indicator 1.g: Delete the words “potential for”.</p>
<p>Indicator 1.g. “potential for special sites” is not necessary if Indicator 1.d. is already requiring that appropriate information and implementation guidance on Forests with Exceptional Conservation Value. What makes a FECV will be described.</p> <p>Referring to Indicator 1.f - most counties have weed control boards that effectively handle this issue.</p>	<p>Remove Indicator 1.f.</p>
	<p>Change “potential” to “characteristics of”</p>
<p>8.1.1.e is unnecessary, as current outreach and materials provided address issues of forest management on a sustainable basis. The specific considerations are decisions that will be based on the landowners’ objectives.</p> <p>PM 8.1.2:</p> <p>This indicator does not align well with the procurement strategy in Objective 8, and should be placed in Objective 17. The Performance Measure should be rewritten to be supportive of forest management certification without a requirement to encourage landowners specifically to participate in such</p>	<p>“Management of residue to consider various utilization options.”</p>

programs.	
under indicator 1, same as my suggestion for the PM 8.1	In 8.1.1 change "shall provide information" to to read-- "shall provide, or make available through SICs, associations, or other groups, information to landowners...
f. is unclear as written. it would be more proactive to articulate that invasives are unwanted and worthy of control.	f. control of invasive exotic plants...
Outreach and education does not ensure the protection of critically imperiled and imperiled species. There are no assurances behind the SFI procurement standard on key elements of conserving biodiversity. As stated above, very positive movement on requiring trained loggers and BMP use in contracts. Would be good to move those logger training programs towards logger certification, and on-the-ground results verification.	Require monitoring results of communications efforts and program to ensure purchased stumpage do not come from sites associated with imperiled and vulnerable species.

Use this space to propose any new Indicators to Performance Measure 8.1:
under 8.1.2, Add "family forest" to describe which landowners... Reason is that large landowners will likely not be candidates for ATF.
ALSO, can you give another example under the "such as the ATF or the -----?"

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

under 8.1.1 Change to -- "Encourage family forest landowners to participate..."

The changes suggested and the new labels are valuable, particularly the % content label. However, the SFI Fiber Certified Sourcing Label continues to be somewhat problematic because practices behind the label vary greatly: from certified "responsible sources", such as SFI or CSA certified lands, to 100% pre-consumer recycled materials to SFI procurement which we believe still has minimal controls to assure "responsible forestry", although improvement is being made in this area with transition to logger training programs and BMP language in (See comments related to "procurement" below.)

Objective 9. Use of Forest Management and Harvesting Professionals. To broaden the practice of sustainable forestry by encouraging forest landowners to utilize the services of forest management and harvesting professionals.

Rationale for proposed change:	Proposed New Language:
Objective 9. Forest management and harvesting professionals are not defined terms. Suggest replacing with defined terms such as qualified logging professionals and qualified resource professionals	Objective 9. Use of Qualified Logging and Qualified Resource Professionals. To broaden the practice of sustainable forestry by encouraging forest landowners to utilize the services of qualified logging and qualified resource professionals.
need logger certification programs to be encouraged and recognized	<p>Performance Measure 9.1 Program participants shall encourage the development an optional program that offers independent third-party audits of logging operations.</p> <p>Indicators:</p> <ol style="list-style-type: none"> 1. Standard shall be consistent with SFI standard and state or provincial BMPs. 2. Standard shall include specific and measurable practices or indicators that address: <ol style="list-style-type: none"> a. Protection of water quality and soils b. Management of visual quality c. Conformance with acceptable silvicultural, operational and utilization

	<p>standards</p> <ul style="list-style-type: none"> d. Compliance with government regulations applicable to logging operations. e. Adherence to site specific harvest and management plans i. Harvest plan required for properties less than 100 contiguous acres ii. Harvest plan and management plan are required for properties with 100-499 acres iii. Properties of more than 500 contiguous acres land shall be certified f. Sound business management and practices <ul style="list-style-type: none"> i. Timber sale contracts shall be in writing and signed by both the logger and the landowner g. Continuing education requirements h. Continuous improvement of the certification program and participants 3. Logger certification field auditors shall be required to have: <ul style="list-style-type: none"> a. Four year degree in forestry from an accredited education institution. 4. Logger certification auditor training: <ul style="list-style-type: none"> a. Auditors shall be required to complete training by a SFI APQ approved auditor. 5. Program or standard shall provide an acceptable statistically valid methodology for conducting random audits of participants. 6. Development of logger certification program should be transparent and include input from the broad forest community. 7. Program oversight shall be provided by an independent board of directors representing the broad forest community. 8. Method to track the purchase and final delivery of wood.
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	(followed by Performance Measure 9.2, which is now 9.1)
Objective 9 should be moved - Objective 9 should be combined with Objective 16 or, at the least, not included as an objective that only applies to procurement. Companies that own their own land should also be expected to utilize the services of qualified logging professionals and an independent third-party certified logging professionals.	
Concern: Wording can be simplified. The word "harvesting" is too narrow.	Recommendation: Substitute "forest operations" for "harvesting". Suggest: "Objective 9 – Use of Professionals. To broaden the practice of sustainable forestry by encouraging forest landowners to use the services of professionals in forest management and operations."
Good changes	
This Objective needs to be adapted for application to "Land Management" and "Procurement". There are interpretations that the use of "qualified resource professionals" and "qualified logging professionals" only applies to "Procurement" operations and I am not sure this is the intent of SFI.	Adapt Objective for broader application or add to the Training objective of SFI.
Is OBJ 9 the wrong place for this? Under 9, this would apply only to procurement participants and it should apply to both procurement and landowners. Either add it to the objectives for landowners or for the objectives for both landowners and procurement. In Obj 9, can be read to introduce the term Management and Harvesting Professionals is introduced. This is confusing because we already have three terms that identify loggers, 1-Certified logging prof. 2--Qualiied logging prof. and the 3--Qualified Resource professional.	Change Obj 9 to Use of Forest Management Professionals and Harvesting Professionals. To broaden the practice of sustainable forestry by encouraging forest landowners to utilize the services of both forest management and harvesting professionals.
A logger certification/SFI relationship would underscore SFI's leadership role in advancing sustainable forest management on family forests and help address the challenge of certifying the fiber harvested from family forestlands.	

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

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

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

On the other hand, support for logger certification within the logging community is impressively high. In Minnesota, nearly three-fourths indicated they were somewhat to very likely to certify their logging business if a logger certification program was established. The Kilgore study provides compelling justification for the need and role of logger certification in providing third-

<p>party certified resource from family forests.</p> <p>Minnesota has approximately 15 million acres of timberland. Of that total, 37% is controlled by family forest landowners and these family forests provide an estimated 45% of the timber harvested each year. This presents a significant challenge to the forest products industry. For example, Time Inc. has asked several mills in Minnesota and across the country to meet a target that 80% of the resource going into their product be certified.</p> <p>Establishing recognition between the SFI program and a logger certification program would provide a unique opportunity to underscore SFI's leadership role in advancing sustainable forest management on family forests. We strongly encourage you to consider reflecting this in the new standard</p>	
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<p>Performance Measure 9.1. Program Participants shall encourage landowners to utilize the services of qualified resource professionals, certified logging professionals and qualified logging professionals in applying principles of sustainable forest management on their lands.</p>	
<p>Rationale for proposed change:</p>	<p>Proposed New Language:</p>
<p>Should be some emphasis put on utilizing certified logging professionals (CLP) vs. qualified logging professionals (QLP). It would act as an incentive for more the CLP program participants as well as add strength to the SFI standards that the "best of the best" are being used.</p>	<p>Program Participants shall encourage landowners to utilize the services of qualified resource professionals, certified logging professionals (CLP's) where they are available, and if CLP's are not available then qualified logging professionals in applying principles of sustainable forest management on their lands.</p>
<p>Who will administer the certification and decide on appropriateness of the</p>	

certification program?	
Comment: Objective 9 should be moved - Objective 9 should be combined with Objective 16 or, at the least, not included as an objective that only applies to procurement. Companies that own their own land should also be expected to utilize the services of qualified logging professionals and an independent third-party certified logging professionals.	
Objective 9 should be moved - Objective 9 should be combined with Objective 16 or, at the least, not included as an objective that only applies to procurement. Companies that own their own land should also be expected to utilize the services of qualified logging professionals and an independent third-party certified logging professionals.	
Concern: The term "certified" in reference to logging professionals is loosely defined between states and provinces, even denoting a legal qualification in some jurisdictions. Therefore, this specific terminology can be confusing particularly given the overlap with the established SFI concept of "Qualified". Also, the sentence structure suggests it is a requirement to use "certified logging professionals", adding to the confusion.	Recommendation: Delete "certified logging professionals". Suggest: "Program Participants shall encourage landowners to utilize the services of qualified resource professionals and qualified logging professionals in applying principles of sustainable forest management on their lands."
This statement does not convey the mandatory use of "qualified/trained" logging professionals - which was discussed in the cover letter (requiring rather than encouraging) outlining the release of the DRAFT standard and open public comment period. It may be a major hurdle (if not impossible) to get to 100% of all deliveries through "qualified/trained" loggers in some regions of the country (i.e. If we are at 90 - 95% in this category - Is it worth it to try and get to 100%)	
	Substitute "certified" with "SFI designated logging professionals"
This Performance Measure needs to be adapted for application to "Land Management" and "Procurement". There are interpretations that the use of "qualified resource professionals" and "qualified logging professionals" only applies to "Procurement" operations and I am not sure this is the intent of SFI.	Adapt PM for broader application or add to the Training objective of SFI.

<p>9.1.1 In the definition of Certified Logging Professional, the logger must ...be a member in good standing of a logger certification program.</p> <p>Please define "logger certification program" and give an example. This is not a trained logger as defined by the SIC!! That needs to be stated in the definition to avoid confusion.</p>	<p>I will add it to the definition in the glossary</p>
<p>CHANGE DEFINITION: Qualified/certified logging professionals MUST include "A person or an organization". Defining the professional entity as only a person is unrealistic and inconsistent with the SFI Standard. Why then is a "wood producer" a "person or an organization"? Why is a SFI certified entity not just the person or CEO? Why would you make the logging company owner the ONLY "qualified/certified" entity?</p>	<p>CHANGE DEFINITION: Qualified/certified logging professionals MUST include "A person or an organization". Implement this language in the DEFINITIONS chapter.</p>

<p>Indicators:</p> <ol style="list-style-type: none"> 1. Program to promote the use of qualified resource professionals, certified logging professionals where available, and qualified logging professionals. 2. List of certified logging professionals and qualified logging professionals maintained by Program Participant, state or provincial agency, loggers' association, or other organization. 	
<p>Rationale for proposed change:</p>	<p>Proposed New Language:</p>
<p>Economic viability</p>	<p>We support the use of qualified resource professionals and qualified logging professionals as approved by SICs. The collaboration on training between</p>

	<p>program participants, SICs, and the logging community is an important strength of the SFI program and is working well. Implementing a program to search for certified logging professionals and document those efforts to show that certified loggers were used where available is cumbersome and unnecessary when a requirement for the use of trained loggers is already in place and working well. We suggest the following revision: "Program to promote the use of qualified resource professionals, certified logging professionals where required by law, or qualified logging professionals."</p>
<p>Indicator 9.1.2: also include "qualified resource professionals" to be consistent with 9.1.1</p>	<p>Indicator 9.1.2: "List of certified logging professionals, qualified logging professionals and qualified resource professionals maintained by Program Participant, state or provincial agency, loggers' association, or other organization."</p>
<p>Concern Indicator 1: As currently written, this Indicator implies that if certified loggers are available they must be given preference over qualified loggers.</p>	<p>Recommendation Indicator 1: "Program to promote the use of qualified resource professionals and qualified logging professionals."</p>
	<p>Substitute "certified" with "SFI designated logging professionals"</p>
<p>Indicator 9.1.1: As currently written, this indicator implies that if certified loggers are available they must be given preference over qualified loggers.</p>	<p>We suggest dropping "where available" and state: "..., certified logging professionals or qualified logging professionals."</p>
<p>This Performance Measure needs to be adapted for application to "Land Management" and "Procurement". There are interpretations that the use of "qualified resource professionals" and "qualified logging professionals" only applies to "Procurement" operations and I am not sure this is the intent of SFI.</p>	<p>Adapt Indicators for broader application or add to the Training objective of SFI.</p>

Use this space to propose any new Indicators to Performance Measure 9.1:

Please use this space to propose any additional Performance Measures and Associated Indicators for Objective 9

Comment: Add performance measure 9.2;

Performance Measure 9.2 Program participants shall encourage the development an optional program that offers independent third-party audits of logging operations.

Indicators:

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

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

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

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

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

On the other hand, support for logger certification within the logging community is impressively high. In Minnesota, nearly three-fourths indicated they were somewhat to very likely to certify their logging business if a logger certification program was established. The Kilgore study provides compelling justification for the need and role of logger certification in providing third-party certified resource from family forests.

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

Establishing recognition between the SFI program and a logger certification program would provide a unique opportunity to underscore SFI's leadership role in advancing sustainable forest management on family forests. We strongly encourage you to consider reflecting this in the new standard

Add performance measure 9.2;

Performance Measure 9.2 Program participants shall encourage the development an optional program that offers independent third-party audits of logging operations. Fiber sourced from family forestland by an SFI recognized independent third-party logger certification program participant should be defined as "certified logger sources" (see proposed new definition under definition comments).

Indicators:

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

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.

Rationale for proposed change:	Proposed New Language:
To reduce Anti-trust concerns offer the appearance of more options for program participants. Let participants develop their own programs.	To broaden the practice of sustainable forestry through the development of programs to utilize BMPs to protect water quality.
In addition to best management practices (BMPs) for water the purchase wood information packages provided to wood suppliers also address BMPs for reforestation, soil conservation, wildlife management, and visual quality. Also, Performance Measure 10.2 is directed at monitoring of all BMPs, not just for water quality. Therefore, it is inconsistent to mention only water quality in the objective.	Delete the reference to water quality from the objective: "To broaden the practice of sustainable forestry through the use of best management practices."
Concern: Best management Practices is terminology that is applied to more than just forestry. Also, BMPs do more than protect water quality.	Recommendation: Consistently add the word "forestry" preceding "Best management practices" or "BMPs" throughout. Suggest, "To broaden the practice of sustainable forestry through the use of forestry Best Management Practices"
Is this in the correct place? It is only for procurement systems under OBJ 10. It must cover landowner participants also. It needs to be in Obj 1-7 or 14-20 to cover landowning SFI Participants.	
Why is this objective only focused on BMPs to protect water quality? There must be other BMPs that have been developed for protecting important fish and wildlife habitats and migration corridors.	Adherence to Best Management Practices. To broaden the practice of sustainable forestry through the use of Best Management Practices to protect water quality and to protect the quality, diversity and distributions of fish and wildlife habitats.

Performance Measure 10.1. Program Participants shall clearly define and implement policies to ensure that mill inventories and procurement activities do not compromise adherence to the principles of sustainable forestry.

Rationale for proposed change:	Proposed New Language:
<p>Indicator 1. The reference to “suppliers” could be construed to mean that employees of landowning companies that supply raw material to manufacturing facilities should be trained as qualified logging professionals. We believe the intent is to have “wood suppliers” who are contracted by landowning companies to be trained.</p>	<p>1. Program for the purchase of raw material from wood suppliers that have completed training programs and are recognized as qualified logging professionals.</p>
<p>Concern: The word “policy” may have unintended ramifications within an industrial setting.</p>	<p>Recommendation: Substitute the word “program” for “policy.”</p>
<p>I think the term "mill" in this case is too limiting considering the development (and recruitment hopefully) of bio energy and pellet facilities.</p>	<p>Replace "mill" with "facility"</p>

Indicators:

1. Program for the purchase of raw material from suppliers that have completed training programs and are recognized as qualified logging professionals.
2. Program to require that harvests of purchased stumpage (including those for bioenergy feedstocks) comply with BMPs.
3. Provisions, requiring the use of BMPs, included in contracts for the purchase of raw material.

4. Program to address adverse weather conditions.	
Rationale for proposed change:	Proposed New Language:
#1 suppliers is not a defined term	#1 raw material from wood producers that
Ind 3 and 4. are dictating practices on others who may or may not be certified. The onus should be on the participants actions, not those of others. By dictating requirements we are taking on liability.	Drop indicators 2 and 3.
Indicator 1: Not all suppliers are wood producers; some of the suppliers are small land owners clearing a small portion of their lot for the purposes of building a home or other structure. This indicator is not practicable in all instances. Perhaps modify this to be a program for the purchase of raw material, which informs suppliers of BMP's and recommends the use of SIC certified logging professionals or qualified logging professionals. Indicator 3: Again there are some suppliers who are converting their land for the purpose of building a home or expanding their field. Requiring BMP's may not fit in these instances. Either insert a clause that small private acreages which are being developed for residential/commercial construction purposes do not apply or replace requiring with recommending.	Indicator 1. Program for the purchase of raw material which informs suppliers of BMP's and recommends the use of SIC certified logging professionals or qualified logging professionals. Indicator 3 Provisions, recommending the use of BMP's, included in contracts for the purchase of raw material. or Indicator 3 Provisions, requiring the use of BMP's, included in contracts for the purchase of raw materials sourced from lands other than those being converted for residential and or commercial construction purposes.
Indicator 2 - References to bioenergy feedstocks does not need to be singled out. Singling out one product may send the signal that complying with BMPs is more important than complying when harvesting another product.	Indicator 2 - delete language in parenthesis.
Performance Measure 10.1, Indicator #1: XXXXX Comment: It is not a realistic expectation for private landowners to undergo training programs, particularly if they are clearing land as a one time occurrence for subsequent non-forest use. This proposed change appears to exceed performance measure 9.1 which only requires program participants to encourage landowners to utilize the services qualified logging professionals. This proposed requirement is	Performance Measure 10.1, Indicator #1: Keep the wording the same as written for the current 2005-2009 standard. Performance Measure 10.1, Indicator #3: Change the indicator to "Promoting the use of BMPs by providing them with contracts for the purchase of raw

<p>inconsistent with the assignation of low risk to wood harvested from private land for subsequent non-forest use by the wood procurement risk assessment form provided by the SIC. This change to the indicator limits the flexibility of the current participant programs with respect to assessing risk and exercising professional judgment with respect to differing types of wood suppliers.</p> <p>Performance Measure 10.1, Indicator #3: Existing contracts with private landholders require adherence to all applicable Acts and Regulations of which there are several that require protection of water quality. Best Management Practices (BMPs) are provided to private landowners through the purchase wood information package; however these BMPs are currently only a recommendation. Where there is a risk of impacting a resource, such as water, a site inspection is done by the program participant in accordance with the wood procurement risk assessment form based upon the form made available by the local SIC. There is already an incentive for a private landowner to follow the BMP's in that it reduces the risk of a penalty issued by an authority under existing laws. Also where a program participant notes a non-compliance with a legal requirement or BMP they can refuse to purchase the wood. In summary, there is no compelling need to make adherence to BMPs a contractual requirement which in practice would be very difficult to enforce on private landowners and may result in these same landowners selling to purchasers that have no such requirement.</p>	<p>material.”</p>
<p>Indicator 1 - this indicator is ok if the intent is to support training for suppliers. If it is to require companies to only buy wood from suppliers that are trained and are qualified logging professionals then it is problematic. In some areas where purchase wood is very competitive, a mill could run out of wood and layoff people if this was in place. We can influence the supplier but we can not control them. They will take their wood elsewhere.</p> <p>Indicator 3 - This indicator should be removed from the standard. Purchase</p>	<p>Indicator 1 - word it so the intent is to support not require training.</p> <p>Indicator 3 - remove the indicator</p>

<p>wood contracts are legal documents between the buyer and seller. Adding BMP use in the contracts would make them a legal requirement. Even SFI Program Participants do not always follow BMP use, and as a result we have non conformances. This holds suppliers to a higher standard than ourselves under the SFI standard. If I was a supplier I would not sign a contract that required BMP use because when I failed and did not follow them, by mistake, I would void my contract. We should stick with promoting BMP use with suppliers it has been effective in the past.</p>	
<p>Contracts between land management organizations and mills essentially makes the land manager the supplier.</p> <p>Indicator 1 suggests that suppliers complete logger training programs. Is that the intent of this indicator?</p>	<p>Program for the purchase of raw material from loggers that have completed training programs and are recognized as qualified logging professionals.</p> <p>or</p>
<p>Indicator 1: Comments submitted previously with the Introduction section with respect to the new proposed requirement to only purchase wood from suppliers who are using qualified logging professionals. Not feasible nor a practical requirement with the current state of the forest industry and economic downturn.</p>	<p>I agree that Program Participants should strive to purchase wood from suppliers who utilize qualified logging professionals but should not be limited to this. Suggest potentially adding "where possible" at the end of Indicator 1.</p>
<p>Concern: As described, the intent can be interpreted to mean programs to become 100% supplied by Qualified Logging Professionals. This is a requirement that cannot be met in most procurement programs due to some supply coming from individual small family forest operators and tribal lands.</p> <p>Recommendation: Make this indicator a promotional requirement: "Program to promote the purchase of raw material from suppliers that have completed training programs and are recognized as qualified logging professionals. "</p> <p>Concern: The word "harvesting" is too narrow. Also, Recommendation:" Program requiring forest operations comply with BMP's"</p>	

<p>Concern: Legitimate implementation of this requirement is not practicable for indirect sources, such as sawmill residual chips, chip mill chips, or roundwood from supplier woodyards.</p> <p>Also, Best management Practices is terminology that is applied to more than just forestry.</p> <p>Also, the SFIS should not dictate requirements for legal contracts. A Standard requirement is a requirement for an outcome.</p> <p>Recommendation: Qualify BMPs with “forestry,” delete “Included in contracts” and add “that is delivered directly from the forest”</p> <p>Suggest: “Provisions, requiring the use of forestry BMPs for the purchase of raw material that is delivered directly from the forest”</p>	
<p>Indicator 1 seems to infer that individual programs become 100% supplied by qualified logging professionals. This is a requirement that cannot be met in most procurement programs due to some supply coming from individual small family forest operators and tribal lands.</p> <p>Indicator 2 again refers to an emerging science that is not well-developed enough to be included in the standard.</p>	<p>1. Include language in the Indicator to allow for a portion of supply to come from unqualified sources in procurement programs/regions where such supply sources are a part of the culture. Allowing for such supply sources in the Standard with provisions that they will be encouraged to avail themselves of training opportunities could help to maintain the credibility of the SFI.</p> <p>2. Program to require that harvests of purchased stumpage comply with BMPs.</p>
<p>There is no benefit to distinguish between product types.</p>	<p>Omit (including those for bioenergy feedstocks)</p>
<p>Indicator 10.1.1:</p> <p>As written it is possible that an auditor would interpret this to mean that 100% of fiber would be harvested by qualified logging professionals. This should be clarified to note that material may come from other sources, such as independent sawmills or supplier woodyards.</p> <p>“Raw material” is a broad term that can apply to materials other than wood,</p>	<p>“Provisions requiring the use of BMPs included in contracts for the purchase of wood fiber procured/sourced directly from the forest.”</p>

<p>and should be replaced with “fiber” or “wood materials.”</p> <p>Indicator 10.1.3:</p> <p>This provision should only be expected in new or renewed contracts. Implementation of this requirement is not practical for indirect sources such as sawmill residuals, chip mill chips, or roundwood from supplier woodyards. The term “raw material” could apply to materials other than wood, and should be replaced.</p>	
<p>In 10.1.1 above, the term "suppliers" is undefined. Shoud be defined in the glossary.</p>	<p>10.1.1 after defining what a "supplier" is in the glossary, 10.1.1 should read-- Program for the purchase of raw material from suppliers. delete the rest...</p>
<p>There should be some indicator(s) developed for determining if BMPs for fish and wildlife actually are protecting the quality, diversity and distributions of fish and wildlife habitats</p>	
<p>1. "Suppliers" should be define in the DEFINITIONS.</p>	<p>Supplier: broker, wood dealer, logger, log re-seller, etc.</p>
<p>Logger training should be required for loggers not wood dealers or other middle men. That is not clear from current wording which uses the term supplier which is not defined in the definition section of the standard.</p>	<p>Replace word supplier with wood producer.</p>

<p>Use this space to propose any new Indicators to Performance Measure 10.1:</p>
<p>Program for the purchase of raw material from the SFI Program Land Management Participants</p>
<p>5. Program to monitor the quality, diversity and distribution of fish and wildlife habitats prior to and after harvests and post-harvest site preparation.</p>
<p>We are resubmitting this recommendation: According to the 1997 SFI National Forum Recommendation to AF&PA Board, each Participant should have a clearly defined procurement policy or program. Though this basic requirement remains, the current wording of the Standard does not make it clear who this policy should be made available to, if anyone.</p>
<p>Proposed New Indicator:</p>

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

Performance Measure 10.2. Program Participants shall monitor the use of BMPs, using public or private sources of information.

Rationale for proposed change:	Proposed New Language:
Concern: Wordy – by suggesting public or private sources of information. What other sources are there?	Recommendation: Delete “...using public or private sources of information.”
<p>The new Objective 10 Indicator 3. Provisions, requiring the use of BMPs, included in contracts for the purchase of raw materials. Since we have no hope of implementing and enforcing this provision through our wood procurement practices for gate wood, we see this as a set up for failure. We understand that our own XXXXX who has partnered with us for many years to achieve improving BMP compliance, has no desire that BMPs become mandatory. You can check this with XXXXX copied above.</p> <p>We require by contract BMP compliance wherever we directly contract for logging services, which is rare / less than 1% of our mill supply. In all other cases, we promote, encourage, and even hold workshops to encourage BMP use.</p>	

Indicators:

1. A verifiable monitoring system to

- a. monitor the use of BMPs by wood producers supplying the Program Participant; and
- b. evaluate use of BMPs across the wood and fiber supply area.

2. Use of information from the verifiable monitoring system to set goals to improve, over time, rates of BMPs compliance.

Rationale for proposed change:	Proposed New Language:
Economic viability	In 10.2.2, consider changing "set goals to improve" to "maintain or set goals to improve". Often rates of BMP compliance can be close to 100%, making goals to improve on already very high rates of compliance a challenge. This change would recognize the already high rates of compliance in many areas, as well as leave requirements for setting improvement goals where practical.
Again these indicators are assigning responsibility to the participants for the actions of others. The participants job is to educate and inform not to manage someone elses business. The choice should be to purchase timber or not based on a risk assessment.	Drop indicators 1 and 2.
Concern: 1. a. and b. overlap. Can be simplified.	Recommendation: Suggest: "1. A verifiable system for monitoring suppliers BMP conformance." Targets for continual improvement in the rates of BMP conformance."
Although we have a field woodlot program for our wood procurement	add "relevant to scale of operations" after "fber supply area" in b. above

<p>operations - some auditors have questioned our sampling procedures.</p> <p>We have used our field woodlot audit program to identify the "top areas" to concentrate our "continuous improvement" activities on for the next year. Again - sometimes you reach a saturation point (i.e. 90+%) where it is difficult to show improvement (have already harvested the low-hanging fruit) due to cost and/or man-power resource constraints.</p>	
<p>This may be evident in the definition of verifiable monitoring system but the use of State or provincial monitoring programs should be incorporated in the indicator.</p>	<p>Add clarification to 1.b- use and/or support of government BMP monitoring programs is encouraged.</p>
<p>Resubmitting this recommendation as we feel very strongly that this indicator needs revision.</p> <p>2 – Thanks in large part to the SFIS, BMP compliance is very high. On the other hand, though remaining high, it can vary significantly from year-to-year due to numerous factors. Setting a continuous improvement goal as written is unrealistic.</p>	<p>2 - Use of information from the verifiable monitoring system to assist Participant and its wood suppliers in maintaining BMP compliance and to identify potential areas for improved performance.</p>

Use this space to propose any new Indicators to Performance Measure 10.2:

Please use this space to propose any additional Performance Measures and Associated Indicators for Objective 10

Procurement by manufacturing facilities enrolled in the SFI Program from sources outside the United States and Canada (Objectives 11-13 apply)

Objective 11. Promote Conservation of Biological Diversity, Biodiversity Hotspots and Major Tropical Wilderness Areas. To broaden the practice of sustainable forestry by conserving biological diversity, biodiversity hotspots and major tropical wilderness areas.

Rationale for proposed change:	Proposed New Language:
The title for Objective 11 over-emphasizes promoting conservation of biodiversity hotspots and major tropical wilderness areas, beyond that which is proposed in the revised indicator.	Objective 11. Promote Conservation of Biological Diversity. To broaden the practice of sustainable forestry by conserving biological diversity.
Objective 11. Suggest inclusion of word "international" to clarify intent of Objective 11	Objective 11. Promote International Conservation of Biological Diversity, Biodiversity Hotspots and Major Tropical Wilderness Areas. To broaden the practice of sustainable forestry by conserving biological diversity, biodiversity hotspots and major tropical wilderness areas.
This title is overly-specific, because most domestic SFI participants have nothing to do with tropical forestry or global hotspots.	Drop from title: ...Biodiversity Hotspots and Major Tropical Wilderness Areas. Include these in the performance measures.

Performance Measure 11.1. Program Participants shall ensure that their procurement programs support the principles of sustainable forestry, including efforts to promote conservation of biological diversity.

Rationale for proposed change:	Proposed New Language:
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Indicators:

1. Procurement from areas outside the United States and Canada promotes conservation of biological diversity utilizing information from sources such as Conservation International’s biodiversity hotspots and major tropical wilderness areas, and the Alliance for Zero Extinction’s program
2. Program with direct suppliers to promote the principles of sustainable forestry.
3. Knowledge about direct suppliers’ application of the principles of sustainable forestry.

Rationale for proposed change:	Proposed New Language:
Indicator 1 - Reference to one particular program dates this document. Recommend it be deleted	Delete reference to Alliance for Zero Extinction
<p>Indicator 11.1.1.</p> <p>Point 1. What would be examples of procurement promoting conservation in these areas? Is it merely not sourcing from these areas? Please clarify.</p> <p>Point 2. Biodiversity hotspots and major tropical wilderness areas will not cover all of the high conservation value forests that might be of concern, particularly those outside of the tropics. issues of conservation of High Conservation Value</p>	<p>We recommend including the following additional sources of information for this indicator:</p> <p>Those forest, woodland, or mangrove ecoregions identified by World Wildlife Fund as a Global 200 Ecoregion and assessed by WWF as having a conservation status of endangered or critical.</p> <p>Those regions identified by the World Conservation Union (IUCN) as a Centre of Plant Diversity.</p> <p>Those regions identified by the World Resources Institute as a Frontier Forest</p>

	Intact Forests Landscapes, as identified by Greenpeace (www.intactforests.org).
<p>Concern 11.1.1: The intent of this Indicator is not clearly stated.</p> <p>Recommendation: Restate. No suggestions.</p> <p>Concern: The phrase “direct suppliers” is italicized; however, the term does not appear in the Definitions section.</p>	Recommendation: Define “direct suppliers”
Because this is a five year standard, naming specific organizations should be avoided.	
<p>Indicator 11.1.1: We are unsure of how this statement would be audited against; it is vague and should be rewritten.</p> <p>Indicator 11.1.2: The phrase “direct suppliers” is italicized; however, the term does not appear in the Definitions section.</p> <p>Indicator 11.1.3: The phrase “direct suppliers” is italicized; however, the term does not appear in the Definitions section.</p>	
# 3 is too weak	Change #3 to “Documented information indicating direct...”

Use this space to propose any new Indicators to Performance Measure 11.1:

Please use this space to propose any additional Performance Measures and Associated Indicators for Objective 11

Objective 12. Avoidance of Controversial Sources including Illegal Logging. To broaden the practice of sustainable forestry by avoidance of illegal logging.

Rationale for proposed change:	Proposed New Language:
Concern: Unclear why do Obj 12 and 13 need to be separate; illegal logging can be highlighted as a paramount controversial source without a dedicated objective.	Recommendation: Combine Objectives 12 & 13. Suggest: "Objective 12. Avoidance of Controversial Sources including illegal logging and Areas without Effective Social Laws."
Need to define "Illegal Logging" in the back of the Standard like FSC does. Customers question this term all the time so a misunderstanding must be present in the market place.	
Illegal logging needs to be qualified in this title to clearly affirm that this is NOT a North American problem! Most SFI participants perform in US or Canada.	ADD WORDING: ...including Illegal Logging outside the US and Canada.
Illegal logging is a term that reflects on loggers conducting a criminal activity. What is probably meant is illegal procurement practices. You can categorize procurement into both off-shore and domestic. It's the procurement methods and not the logging you control through SFI.	Substitute "illegal procurement practices" for "illegal logging" and add a domestic category. Illegal procurement practices in a domestic market would be accepting wood from loggers/suppliers who have been convicted of timber theft in a domestic court of law, who do not carry state mandated workers compensation and USDOT mandated vehicle liability insurance, and who commingle wood received from SFI qualified loggers with non-qualified loggers. Illegal procurement in an off-shore situation would be whatever you can

	negotiate with the international environmental community given the fact we likely have limited impact on changing off-shore business practices and laws.
	Add provisions to ensure material from outside the United States and Canada does not come from areas that have been illegally logged.

Performance Measure 12.1. Program Participants shall ensure that their procurement programs support the principles of sustainable forestry, including efforts to thwart illegal logging.	
Rationale for proposed change:	Proposed New Language:
See comments above. It's the procurement practice, not the logging.	

1. Process to assess the risk that the Program Participant's procurement program could acquire material from illegal logging.
2. Program to address any significant risk identified under 12.1.1
3. Program with direct suppliers to promote the principles of sustainable forestry.
4. Knowledge about direct suppliers' application of the principles of sustainable forestry.

Rationale for proposed change:	Proposed New Language:
	The definition of "direct suppliers" is missing from the glossary.
Indicator 12.1.1. What are the sources of information for assessing risk?	Recommend providing additional guidance on risk assessment procedures.
1. Unclear intent	1. CHANGE WORDING: ...procurement program inadvertently acquire material...

Use this space to propose any new Indicators to Performance Measure 12.1:

Add Indicator 5.

Develop process that requires loggers to provide adequate information to first delivery points that identifies where the forest products was purchased and harvested.

Please use this space to propose any additional Performance Measures and Associated Indicators for Objective 12

Objective 13. Avoidance of Controversial Sources including Fiber Sourced from Areas without Effective Social Laws. To broaden the practice of sustainable forestry by avoiding controversial sources.

Rationale for proposed change:	Proposed New Language:
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	Avoidance of Controversial Sources including Fiber Sourced from Areas without Effective Social measures. To broaden the practice of sustainable forestry by avoiding controversial sources.
This opens everything up to lawsuits and endless costs. All the laws we already have prevent a landowner or anyone else from "adversely affecting" any Social Laws.	Delete this requirement
<p>We strongly recommend a more robust definition of Controversial Sources. Considering Obj. 11-13, we recommend explicit provisions for addressing conflict timber and wood coming from regions where there is a significant occurrence of deforestation of natural and semi-natural forests (i.e. conversion).</p> <p>Particularly if Indicator 11.1.1 is limited to biodiversity hotspots and major tropical wilderness areas, none of the indicators across Objectives 11-13 address issues of conservation of High Conservation Value Forests that may be outside these largely tropical areas.</p> <p>In general, the emphasis on having programs to address risk for the various controversial sources does not give adequate assurance to customers that SFI certified products do not contain "controversial sources." We recommend strengthening the Procurement Objectives to bring them in-line with FSC's Controlled Wood standard.</p>	
Concern: Unclear why do Obj 12 and 13 need to be separate; illegal logging can be highlighted as a paramount controversial source without a dedicated objective.	Recommendation: Combine Objectives 12 & 13. Suggest: "Objective 12. Avoidance of Controversial Sources including illegal logging and Areas without Effective Social Laws."
Need to define "Effective Social Laws" in the back of the Standard	
<p>under 13.1.2</p> <p>--reference to 8.6.1 should be revised to 13.1.1</p>	

Unclear intent that this applies to off-shore areas.	CHANGE WORDING: ...by avoiding controversial sources outside of the US and Canada.
Controversial Sources is not well defined. Any disagreement can lead to a controversy. You open the process up to controversy.	Define whatt you mean. Is it an effort to require a social conscience or environmental conscience? If so then a pseudo regulatory approach through SFI will be ineffective.
Need to clarify what "without effective laws" means	Objective 13. Avoidance of Controversial Sources including Fiber Sourced from Areas without Effective Social Laws. To broaden the practice of sustainable forestry by avoiding controversial sources from aareas not complying with International standards regarding native populations, workers, and small holders.

Performance Measure 13.1. Program Participants shall avoid controversial sources and encourage economically, environmentally, and socially sound practices.	
Rationale for proposed change:	Proposed New Language:
See above	How do you audit this? Is there a list of countries like the "axis of evil" or have we sighted the enemy and he is us?
Section 13.1 includes environmentally sound practices but almost all indicators are social. Process should assess risk, using indicators under objectives 1-7 as they relate to wildlife, habitat, water quality, and maintenance of productivity and biodiversity.	

Indicators:

1. Process to assess the risk that the Program Participant's procurement takes place in countries without effective laws addressing the following:
 - a. workers' health and safety;
 - b. fair labor practices;
 - c. indigenous peoples' rights;
 - d. antidiscrimination and antiharassment measures;
 - e. prevailing wages; and
 - f. workers' right to organize.

2. Program to address any significant risk identified under 8.6.1.

Rationale for proposed change:	Proposed New Language:
Incorrect reference	13.1.2 Program to address any significant risk identified under 13.1.1
Is it possible that procurement can occur in COUNTRIES without such laws, yet the practices/policies ensure these measures? As written, the risk assessment is focused on the COUNTRY and not the actual practices.	1. Process to assess the risk that the Program Participant's procurement takes place in a manner that addresses the following: <ol style="list-style-type: none"> a. workers' health and safety; b. fair labor practices; c. indigenous peoples' rights; d. antidiscrimination and antiharassment measures; e. prevailing wages; and f. workers' right to organize.

<p>It is the country of origin to decide these rules and laws. Do not buy from them if these countries are not good stewards of resources and people.</p>	
<p>Indicator 2 appears have carried forward reference to the current indicator 8.6.1. Should reference risk associated with 13.1.1</p>	<p>2. Program to address any significant risk identified under 13.1.1.</p>
<p>Concern: It is possible that procurement can occur in countries without such laws yet the practices/policies ensure these measures. As written, the risk assessment is focused on the country not actual practices.</p>	<p>Recommendation: Delete: "... countries without effective laws..."</p>
<p>Worthy to mention legal immigrant worker status.</p>	<p>ADD: g. legal immigration worker status</p>
<p>These indicators are particularly troublesome because while it could be impossible to assess these indicators in other countries, there are already laws in place for the US that address these based on size of businesses and firmly established in code. Professional loggers will comply. Off-shore loggers probably will not. You will be unable to level this playing field. Unfortunately we also feel that efforts in liberal dominated countries (this now includes the US) to favor unionization will further impact a US professional logger's ability to be competitive.</p>	<p>Eliminate this section unless you are willing to recognize logging professionals who meet and exceed existing laws.</p>
<p>Current list does not meet PEFC requirements, ILO core labor standards, or Convention 169 of the ILO</p>	<p>1. Process to assess the risk that the Program Participant's procurement takes place in countries without effective laws addressing the following:</p> <ul style="list-style-type: none"> a. workers' health and safety; b. fair labor practices; c. indigenous peoples' rights; d. antidiscrimination and antiharassment measures; e. prevailing wages; and f. workers' right to organize without interference from employers in both private and public employment. g. right to bargain without loss of employment

h. no fiber sourced from countries using forced labor

Use this space to propose any new Indicators to Performance Measure 13.1:

3. Process to assess the risk that the Program Participant's procurement takes place in countries without effective environmental laws addressing:
- a. biodiversity
 - b. habitat conservation
 - c. water quality
 - d. maintenance of productivity
4. Program to address any significant risk identified under 8.6.2 and encouragement to adopt BMPs as they relate to same.

Please use this space to propose any additional Performance Measures and Associated Indicators for Objective 13

SFI Standard Objectives 14 – 20 for Forest Management and Procurement

Objective 14. Legal and Regulatory Compliance. Compliance with applicable federal, provincial, state, and local laws and regulations.

Rationale for proposed change:

Concern: The entire Objective is too wordy.

Proposed New Language:

Recommendation: Suggest combine 14.1 & 14.2 using the 5 indicators with simplified wording for 1 thru 3 as follows:

- 1. Access to relevant laws and regulations. in appropriate locations) (implicit)

	<p>2. System to achieve compliance. Delete “with applicable federal, provincial, state or local laws and regulations.” (no need to reiterate)</p> <p>3. Demonstration of legal commitment to compliance. through available regulatory action information</p>
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<p>Performance Measure 14.1. Program Participants shall take appropriate steps to comply with applicable federal, provincial, state, and local forestry and related social and environmental laws and regulations.</p>	
<p>Rationale for proposed change:</p>	<p>Proposed New Language:</p>
<p>Concern: The term “social” is abstract and not commonly defined. This is not an auditable item.</p>	<p>Recommendation: Delete “forestry and related social and environmental”</p>
<p>“Social laws” are included in Performance Measure 14.2, including it in Performance Measure 14.1 is redundant, and it should be deleted.</p>	
<p>Steps to comply does not result in compliance. routine violations must result in loss of certification</p>	<p>Performance Measure 14.1. Program Participants shall take comply with applicable international standards, federal, provincial, state, and local forestry and related social and environmental laws and regulations.</p>

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. Respect protected areas identified through government processes.

Rationale for proposed change:	Proposed New Language:
<p>The term "government processes" is not defined.</p> <p>Is a tribal portion of a tribal entity a government process or can a single non-consenting tribal member or individual be a government process?</p>	<p>Define the term.</p>
<p>Enhance credibility of the standard</p>	<p>Clarification is needed on what it means to "respect protected areas".</p>
<p>Ind 2. System is not a consistent use of terms.</p>	<p>Ind 2. Program to achieve...</p>
<p>The meaning of Indicator 4 is vague and should be rewritten to provide more clarity or completely removed. Specifically, the meaning of the terms "respect", "protected areas", and "government processes" are unclear. If the intent is to manage "protected areas" as identified by federal or provincial laws, then Indicator 2 is sufficient.</p>	<p>Delete Indicator 4.</p>
<p>Indicator 4 is too vague. The word "Respect" is subjective at best. "Government processes" is a blank check for any and every government process, some of which are not laws or regulations.</p> <p>This indicator is redundant and unnecessary. Best way to fix this indicator is to strike it from the standard.</p>	<p>Eliminate indicator 4</p>

Remove Indicator 4. I'm not familiar with how protected areas and/or associated legislation works in the US, but not respecting a protected area identified through a government process is not an option in Canada (its illegal). I'm not sure why this indicator was added to the standard, but it appears to reduce the credibility of the standard.	Remove indicator 4.
Concern Indicator 4: The words "Respect" and "identified" are vague.	Recommendation: Rewrite the Indicator to state what is intended
The meaning of Indicator #4 is very vague and should be rewritten to provide more clarity or completely removed as #1-3 are perfectly clear. The meaning of the terms "respect", "protected areas", and "government processes" are unclear and unacceptable.	The wording of this indicator is so unclear that it should be completely rewritten or removed. Our uncertainty of the meaning of this indicator impedes the SIC from making a proposed Language revision.
Indicator 14.1.4: All terms ("respect," "protected areas," and "government processes") stated in this indicator are vague and undefined in the standard.	The language should be clarified, and moved to Objective 6.
in 14.1.4 the term "government processes" is vague. Instead, consider Abide by regulations on areas protected by state, provincial, or national law.	in 14.1.4 the term "government processes" is vague. Instead, consider Abide by regulations on areas protected by state, provincial, or national law.
4. Unclear intent.	4. Adhere to applicable laws and regulations that protect natural resources.
How many laws can be violated before action is taken?	5. No record of repeated violations with 1-4.

Use this space to propose any new Indicators to Performance Measure 14.1:

Performance Measure 14.2. Program Participants shall take appropriate steps to comply with all applicable social laws at the federal, provincial, state, and local levels in the country in which the Program Participant operates.

Rationale for proposed change:	Proposed New Language:
What is social law? It's either a law or its not.	." . . comply with all applicable laws . . . "

Indicator:	
1. Written policy demonstrating commitment to comply with social laws, such as those covering civil rights, equal employment opportunities, antidiscrimination and antiharassment measures, workers' compensation, indigenous peoples' rights, workers' and communities' right to know, prevailing wages, workers' right to organize, and occupational health and safety.	
Rationale for proposed change:	Proposed New Language:
Every other policy requirement is in the Principles Section.	Move this policy requirement to the Principles section of the standard.
Again, drop the word "social" unless that's a legal term, in which case, it should be clearly defined.	
Worthy to mention legal worker status.	ADD: , and legal immigrant worker status.
	Written policy demonstrating compliance with with social laws and applicable international conventions, such as those covering civil rights, equal employment opportunities, antidiscrimination and antiharassment measures, workers' compensation, indigenous peoples' rights, workers' and communities' right to know, prevailing wages, workers' right to organize and bargain, and occupational health and safety.

Use this space to propose any new Indicators to Performance Measure 14.2:

2. No record of repeated violations of 1. above

Please use this space to propose any additional Performance Measures and Associated Indicators for Objective 14

Objective 15. Forestry Research, Science, and Technology. To improve forestry research, science, and technology, upon which sustainable forest management decisions are based.

Rationale for proposed change:	Proposed New Language:
Very difficult to demonstrate "improvement", since science is often in the eye of the beholder.	Drop "to improve" and change to: "support" forestry science.....
Demonstrating that a Program Participant has "improved" research, etc is very difficult.	Objective 15. Forestry Research, Science, and Technology. To support forestry research, science, and technology, upon which sustainable forest management decisions are based.
The word "continuously" should be added for clarification.	To continuously improve forestry research, science, and technology, upon which sustainable forest management decisions are based.
The statement following Objective 15 should be clarified to emphasize the practices of sustainable forestry, not the decisions.	"To utilize forestry research to improve science and technology, upon which sustainable forest management practices are based."

<p>The term "improve" above indicates that something must be made better. Whether research actually makes something better may require many years to determine. "support" is a better term than "improve" because "support" can be proven or measured by looking at test areas, membership in NCASI, cooperation with a university, etc.</p>	<p>Change...To improve forest research, science... to the following. ...to To "support" forest research, science...</p>
<p>Good revision</p>	

<p>Performance Measure 15.1. Program Participants shall individually and/or, through cooperative efforts of SFI Implementation Committees (SICs), and/or through associations provide in-kind support or funding for forest research to improve the health, productivity, and sustainable management of forest resources and the environmental benefits and performance of forest products.</p>	
<p>Rationale for proposed change:</p>	<p>Proposed New Language:</p>
<p>Economic viability</p>	<p>While XXXXX appreciates the recognition being given to the work program participants do through SICs in areas such as landowner outreach and logger training, we suggest removing forest research, science, and technology from the possible SIC objectives. There are many other organizations that already provide credible forest research, such as NCASI, AFF, and university programs, and government agencies. SICs core function and area where they contribute the most value is in outreach and education.</p> <p>We also suggest adding language for states such as Oregon and Washington that have severance tax programs where funding goes to research.</p>
<p>Need to clarify what is meant by "performance of forest products:</p>	<p>I do not have a proposal for the new language because I don't understand what is meant by "performance of forest products".</p>

<p>Change and/or to "or" to read more correctly</p>	<p>Performance Measure 15.1. Program Participants shall individually or through cooperative efforts of SFI Implementation Committees (SICs) or associations, provide in-kind support or funding for forest research to improve the health, productivity, and sustainable management of forest resources and the environmental benefits and performance of forest products.</p>
<p>Concern: The existing list is comprehensive, so the phrase “and the environmental benefits and performance of forest products” adds nothing. Additionally, it is not clear what this means. If this is referring to end products, then that is well beyond the scope of the SFI Standard.</p>	<p>Recommendation: Delete the newly added phrase “and the environmental benefits and performance of forest products”.</p>
<p>The inclusion of “and/or” is confusing and should be clarified by denoting that individual efforts, SICs, and other associations are examples of efforts. The newly added phrase “and the environmental benefits and performance of forest products” is not clear.</p>	<p>“Program Participants shall individually or through cooperative efforts (e.g. SFI Implementation Committees, industry associations) provide funding or in-kind support for forestry research to improve the health, productivity, and sustainable management of forest resources.”</p>
<p>good</p>	
<p>Few managed wildlife species are ‘stand-level’ and this terminology excludes aquatic environments.</p>	<p>Remove "or" and replace with "and" in 15.1.1 d. to read: "management at stand and landscape levels." Add “air” and "aquatic, wetland and riparian habitats to 15.1.1 c. to read: "water and air quality, aquatic, wetland and riparian habitats;”</p>

<p>Indicator:</p> <p>1. Current financial or in-kind support of research to address questions of relevance in the region of operations. The research shall include some of the following issues:</p> <ul style="list-style-type: none"> a. forest health, productivity, and ecosystem functions; b. chemical efficiency, use rate, and integrated pest management;
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- c. water quality and/or effectiveness of BMPs;
- d. wildlife management at stand or landscape levels;
- e. conservation of biological diversity;
- f. ecological impacts of bioenergy feedstock removals on productivity, wildlife habitat, water quality, and other ecosystem functions;
- g. climate change research for both adaptation and mitigation.
- h. social issues;
- i. forest operations efficiencies and economics;
- j. energy efficiency;
- k. life cycle analysis;
- l. avoidance of illegal logging; and
- m. avoidance of controversial sources.

2. Research on genetically engineered trees via forest tree biotechnology shall adhere to all applicable federal, state, and provincial regulations and international protocols.

Rationale for proposed change:	Proposed New Language:
Concern: 15.1.1 can be simplified.	<p>Recommendation: Suggest: "1. Demonstrated support for locally pertinent forestry research."</p> <p>Also, suggest breaking c) into two distinct issues; Water quality protection; Operations BMP's.</p>
Indicator 15.1.1: Document jumps from Indicator 1 to 4	

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Use this space to propose any new Indicators to Performance Measure 15.1:

Performance Measure 15.2. Program Participants shall individually and/or, through cooperative efforts of SICs, and/or through associations develop or use state, provincial, or regional analyses in support of their sustainable forestry programs.	
Rationale for proposed change:	Proposed New Language:
All regional analysis are not worthy of implementation (use)	Change "develop and use" to: "develop and consider"
Economic viability	While XXXXX appreciates the recognition being given to the work program participants do through SICs in areas such as landowner outreach and logger training, we suggest removing forest research, science, and technology from the possible SIC objectives. There are many other organizations that already provide credible forest research, such as NCASI, AFF, and university programs. SICs core function and area where they contribute the most value is in outreach and education.
Change and/or to "or to read more correctly	Performance Measure 15.2. Program Participants shall individually or through cooperative efforts of SICs or associations, develop or use state, provincial, or regional analyses in support of their sustainable forestry programs.

<p>Concern: 15.2 can be simplified.</p>	<p>Recommendation 15.2: Suggest: "1. Active participation or involvement in the following:"</p>
<p>15.2 ...develop or use state, provincial... "use" them if appropriate for the application but not be forced to use something inappropriate. Better word is consider. Some regional analyses are not credible.</p>	<p>...and/or through associations develop new or consider using existing state, provincial, or regional...</p>

<p>Indicator:</p> <p>1. Participation, individually or through cooperative efforts of SICs or associations at the state, provincial, or regional level, in the development or use of some of the following:</p> <ul style="list-style-type: none"> a. regeneration assessments; b. growth and drain assessments considering both conventional and bioenergy feedstock harvesting; c. BMPs implementation and compliance; d. biodiversity conservation information for family forest owners; and e. social, cultural or economic benefit assessments. 	
<p>Rationale for proposed change:</p>	<p>Proposed New Language:</p>
<p>Indicator 1b - again, do not need to differentiate between conventional and</p>	<p>Delete reference to "bioenergy feedstock harvesting".</p>

bioenergy feedstock harvesting.	
Indicator 1.b again refers to an emerging science that is not well-developed enough to be included in the standard.	b. growth and drain assessments;
There should be no distinction between harvest types.	
Indicator 15.2.1d unnecessarily references “family” forest owners, and should be struck, leaving the reference to “forest owners”.	
In #1, should add national and local levels – these are relevant, too.	Change to “national, state, provincial, regional, or local level.”

Use this space to propose any new Indicators to Performance Measure 15.2:

Please use this space to propose any additional Performance Measures and Associated Indicators for Objective 15

Objective 16. Training and Education. To improve the practice of sustainable forest management by resource professionals, wood producers, and contractors through appropriate training and education programs.	
Rationale for proposed change:	Proposed New Language:

<p>The statement supporting Objective 16 needs to be raised to a higher level and broadened in scope. To improve the practice of sustainable forest management does not capture the full essence of what is desired by training programs. Training is intended to increase both the rates of implementation and the effectiveness of implemented practices.</p> <p>In addition, the phrase sustainable forest management can be misleading, limiting the interpretation of the scope of improved practices. As phrased, it tends to connote activities surrounding the management of forests specifically thereby excluding many procurement activities.</p> <p>Listing the groups of implementers (resource professionals, wood producers and contractors) of sustainable forestry practices does not enhance the objective. These professionals are listed in the performance measures and indicators. The supporting statement without the professional list is more concise and clarifies the intended cause and effect.</p>	<p>Objective 16. Training and Education</p> <p>To improve the implementation and effectiveness of sustainable forestry practices through appropriate training and education programs.</p>
<p>This indicator should apply to all who move dirt, but not all "contractors"</p>	<p>....and site prep, road building, and brush piling contractors.....</p>
<p>Comment: Objective 9 should be moved - Objective 9 should be combined with Objective 16 or, at the least, not included as an objective that only applies to procurement. Companies that own their own land should also be expected to utilize the services of qualified logging professionals and an independent third-party certified logging professionals.</p>	
<p>The use of the word improve implies that we are doing something wrong or have practices which need improvement. Perhaps use the word promote instead. It has been used in other sections throughout the Standard.</p>	<p>Training and Education. To promote the practice of sustainable forest management by resource professionals, wood producers, and contractors thought appropriate training and education programs.</p>
<p>Objective 8 and 16 should be combined and apply to all participants - not just those that procure wood. Companies that own their own land should also be expected to utilize the services of qualified logging professionals and an independent third-party certified logging professionals.</p>	
<p>This objective needs to be broader than the current language to capture the</p>	<p>"To improve the implementation and effectiveness of sustainable forestry</p>

<p>full essence of what is conveyed by training programs. Training attempts to increase the rates of implementation and the effectiveness of implementation practices.</p>	<p>practices through appropriate training and education programs.”</p>
<p>The requirements outlined in Objective 9 to promote use of "qualified resource professionals" and qualified logging professionals" need to be included in this Objective, PMs and Indicators. There are interpretations that using "qualified resource and logging professionals" is a requirement for Procurement only organizations.</p>	
<p>Reference to "contractors" is confusing. Which contractors are we referring to? Logging, tree planing, site prep, trucking, BMP installation, firelane construction, road construction, etc. Needs to be changed to a defined term or define it in the glossary.</p> <p>"resource professionals" is not defined. Needs to be changed to a defined term or define it in the glossary.</p>	
<p>Objective 10 of the SFI Standard, SFIS Objective for Training and Education, is clearly not solely intended for forest workers, stating as it does: "to improve the practice of sustainable forest management by resource professionals, logging professionals, and contractors through appropriate training and education programs." By including in the SFI Standard, a requirement for resource professionals to belong to their provincial professional associations, Obj. 10 will be more than adequately satisfied. Registered Professional Foresters and Certified Forest Technicians are required to earn a set number of continuing education credits each year, and to report their earned credits on a regular basis. The XXXXX audits a percentage of their members' reports, while the XXXXX approves applications for Continuing Education Certificates for each three year period and reviews these as they are submitted. The XXXXX and XXXXX facilitate achievement of the requirement for continuing education by offering courses, seminars and field days. The XXXXX also maintains a comprehensive list of training offered by several different organizations.</p>	<p>XXXXX strongly encourages SFI Inc. to enhance your sustainable forestry program by including within Objective 10 the requirement for all forest practitioners employed or contracted by program participants seek membership in their provincial professional associations with the goal of assuring long term, accountable management of our renewable resources.</p>

<p>Acceptable continuing education covers a broad range of topics, from technical subjects to policy-based presentations discussing the future direction of forest management and wood products markets.</p>	
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Performance Measure 16.1. Program Participants shall require appropriate training of personnel and contractors so that they are competent to fulfill their responsibilities under the SFI Standard.

<p>Rationale for proposed change:</p>	<p>Proposed New Language:</p>
<p>Resource professionals should be included.</p>	<p>Program Participants shall require appropriate training of resource professionals and contractors so that they are competent to fulfill their responsibilities under the SFI Standard.</p>
<p>The requirements outlined in Objective 9 to promote use of "qualified resource professionals" and qualified logging professionals" need to be included in this Objective, PMs and Indicators. There are interpretations that using "qualified resource and logging professionals" is a requirement for Procurement only organizations.</p>	
<p>As a State Agency, we can't limit the ability of potential purchasers to require their contractors to be trained. We train our own employees and direct contractors that we hire, but find we often have to resort to encouraging the training practices of our purchaser's contractors. Once we sell the timber, it no longer is our ownership and the purchaser is responsible for hiring trained contractors if they wish to apply the SFI label.</p>	<p>Perhaps a clarification of where the ultimate responsibility for training contractors lies, i.e. with the actual employer (purchaser) not (as in our case) with the land management entity which has no control over who the purchaser hires to log their timber.</p>

<p>Financial and in-kind support for professional certification and training for technicians and inventory/resource planners should be added to 16.1 or 16.2. For #3 and 4, it might be advisable to have an auditable record of these activities.</p>	<p>Add: "to include documentation that such activities have taken place" to end. Change #4 to: "Consultant and contractor education and training sufficient to their roles and responsibilities, to include documentation that such activities have taken place."</p>
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<p>Indicators:</p> <ol style="list-style-type: none"> 1. Written statement of commitment to the SFI Standard communicated throughout the organization, particularly to mill and woodland managers, wood procurement staff, and field foresters. 2. Assignment and understanding of roles and responsibilities for achieving SFI Standard objectives. 3. Staff education and training sufficient to their roles and responsibilities. 4. Contractor education and training sufficient to their roles and responsibilities.

Rationale for proposed change:	Proposed New Language:
<p>The requirements outlined in Objective 9 to promote use of "qualified resource professionals" and qualified logging professionals" need to be included in this Objective, PMs and Indicators. There are interpretations that using "qualified resource and logging professionals" is a requirement for Procurement only</p>	<p>Add indicators from Objecte 9.1</p>

organizations.	
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Use this space to propose any new Indicators to Performance Measure 16.1:	
1. Program to promote the use of qualified resource professionals, certified logging professionals where available, and qualified logging professionals.	
2. List of certified logging professionals and qualified logging professionals maintained by Program Participant, state or provincial agency, loggers' association, or other organization.	

Performance Measure 16.2. 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.
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Rationale for proposed change:	Proposed New Language:
Need SIC help in funding certified logger programs. If SFI participants wish to raise the bar to the next level in their procurement practices, then they should be working with the SIC and the logging community to help promote logger certification programs.to foster improvement in the professionalism of wood producers, including support for certified logger programs.
Should also be applied to dirt moving contractors wood producers and site prep, road building, and brush piling contractors.....
Concern: PM 16.2 can be simplified.	Recommendation: Suggest: "Program Participants shall work actively and cooperatively to promote improvement in the professionalism of wood producers."
The Performance Measure should include other resource professionals and	Program Participants shall work individually and/or with SFI Implementation

contractors as well.	Committees, logging or forestry associations, or appropriate agencies or others in the forestry community, to foster improvement in the professionalism of wood producers, contractors and resource professionals.
Need to include, either in existing indicators or by adding another, migrant worker considerations.	

<p>Indicator:</p> <p>1. Participation in or support of SFI Implementation Committees to establish criteria and identify delivery mechanisms for wood producers’ training courses that address:</p> <ul style="list-style-type: none"> a. awareness of sustainable forestry principles and the SFI Program; b. BMPs, including streamside management and road construction, maintenance, and retirement; c. regeneration, invasive exotic plants and animals, forest resource conservation, aesthetics, and special sites; d. awareness of responsibilities under the U.S. Endangered Species Act, the Canadian Species at Risk Act, and other measures to protect wildlife habitat (e.g. Forests with Exceptional Conservation Value); e. logging safety; f. U.S. Occupational Safety and Health Administration(OSHA) and Canadian Centre for Occupational Health and Safety (COHS) regulations, wage and hour rules, and other provincial, state and local employment laws; g. transportation issues; h. business management i. public policy and outreach; j. awareness of emerging technologies and markets (e.g. bioenergy feedstock removal, carbon offsets)

Rationale for proposed change:	Proposed New Language:
Economic viability / Enhance credibility of the standard	Indicators 16.2 (a-i) are more objective, and in most cases legally based, topics. Having SICs develop criteria for training around “emerging technologies” as is noted in 16.2.(j) , could be very problematic with a variety of stakeholders serving on SICs who may not share common viewpoints on the message that should be communicated. Currently many state forestry associations and state forestry commissions are addressing these emerging technologies and providing numerous opportunities regarding knowledge sharing with landowners already. Recommend deleting indicator 16.2 (j)
Indicator 1j - references to bioenergy feedstock and carbon offsets will date this indicator. There are other emerging markets, including non-traditional markets such as mushrooms, agro-forestry, native grasses, etc. Recommend current examples either be deleted or the list expanded.	
16.1.j - change recommended for clarity - also delete the e.g. here	16.1.j. awareness of changing technologies and emerging markets
To what extent do we expect loggers to know about invasive exotic plants or animals? Is this just an awareness of the possibilities? I think we need to be cautious and not forget our primary focus in logging is to move wood responsibly. Not saying knowledge is not needed, just wondering how far this particular area is going?	
1c. Same comment as previous with respect to lumping terms such as "exotic" and "invasive" together.	
Indicator 1.j again refers to an emerging science that is not well-developed enough to be included in the standard.	Remove Indicator 1.j.
The Standard should define what training courses are considered mandatory (entry-level training program & Cont.Ed. programs) and which are considered as elective courses (i.e. BMPs/Water Quality courses are likely to be considered as "required" under any scenario). This question also plays into the discussion	

<p>as to what should the number (hours) of required/target Cont.Ed. courses be? Some states use 8 - 10 hours every 2 years and do not allow a logger, forester or landowner to get credit for several 1-2 hour seminars to make up the 8+ hour requirement. Should we require a national Cont.Ed. requirement like the SAF?</p>	
<p>Because this is a five year standard, examples of emerging markets may become dated. Omit examples.</p>	
<p>16.2.1.j should not include awareness of emerging technologies and markets, as there are a wide variety of stakeholders serving on SICs who may not share common viewpoints on the message. State forestry associations and commissions are addressing these concerns, and it is not necessary to include this in the standard.</p>	<p>This indicator should be deleted.</p>
<p>The Performance Measure should include resource professionals as well. A number of the topics outlined above are relevant for all resource professionals. Furthermore, by focusing training requirements only on loggers and wood producers, a number of other resource professionals and contractors are being overlooked.</p>	<p>Participation in or support of SFI Implementation Committees to establish criteria and identify delivery mechanisms for wood producers' and resource professional' training courses that address:</p> <ul style="list-style-type: none"> a. awareness of sustainable forestry principles and the SFI Program; b. BMPs, including streamside management and road construction, maintenance, and retirement; c. regeneration, 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. safety; f. U.S. Occupational Safety and Health Administration(OSHA) and Canadian Centre for Occupational Health and Safety (COHS) regulations, wage and hour rules, and other provincial, state and local employment laws; g. transportation issues;

	<ul style="list-style-type: none"> h. business management i. public policy and outreach; j. awareness of emerging technologies and markets (e.g. bioenergy feedstock removal, carbon offsets)
f. worthy to mention legal worker immigrant status and federal employment laws.	f. ADD: ...and other FEDERAL, provincial, state, and local employment and immigrant worker status laws;
<p>PM allows means other than SIC training for loggers. The indicator associated with this PM only refers to SIC approved training. Certain states lack SICs, or the SIC is so weak that some loggers refuse to attend "SIC approved" training as there are numerous other receiving facilities that do not encourage or require this training. Suggest adding an Indicator sanctioning alternative training options when necessary.</p>	<p>2. In fiber supply areas where SIC-approved logger training is unavailable or unfeasible for some or all loggers, Participants shall, at a minimum, ensure that loggers providing fiber to their facilities have satisfactory training, experience and/or knowledge in the areas of;</p> <ul style="list-style-type: none"> a. BMPs, including streamside management and road construction, maintenance, and retirement; b. awareness of responsibilities under the U.S. Endangered Species Act, the Canadian Species at Risk Act, and other measures to protect wildlife habitat; and c. U.S. Occupational Safety and Health Administration regulations, wage and hour rules, and other employment laws

Use this space to propose any new Indicators to Performance Measure 16.2:

Please use this space to propose any additional Performance Measures and Associated Indicators for Objective 16

Objective 17. Community Involvement 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.	
Rationale for proposed change:	Proposed New Language:
"Support and promote" may be interpreted to mean active or financial support. This may be beyond our means.	Take out "support"
Concern: Objective 17 can be simplified. The public reporting requirement is a great means to public involvement and is detailed within the indicators & reiterated in Objective 19.	Recommendation: Suggest: Objective 17 Community Involvement. To broaden the practice of sustainable forestry by encouraging participation and promoting awareness of the public and the forestry community.
Define: "Forestry Community" and give examples as to how we can get this "community" to participate in the committment to sustainable forestry.	
This should return to broaden the practice of sustainable forestry. The community involvement implies a forced stakeholder process like FSC.	Broaden the practice of sustainable forestry.

Performance Measure 17.1. Program Participants shall support and promote efforts by consulting foresters, state, provincial and federal agencies, state or local groups, professional societies, conservation organizations, indigenous peoples and governments, community groups and the American Tree Farm System® and other landowner cooperative programs to apply principles of sustainable forest management.

Rationale for proposed change:	Proposed New Language:
	add universities and extension services
Recommend adding universities and extension agencies to the list of efforts to promote.	Performance Measure 17.1. Program Participants shall support and promote efforts by consulting foresters, state, provincial and federal agencies; state or local groups, universities and extension offices, professional societies, conservation organizations, indigenous peoples and governments, community groups and the American Tree Farm System® and other landowner cooperative programs to apply principles of sustainable forest management.
Suggest removing American Tree Farm System, as I do not believe that SFI Inc. should only be promoting 1 certification scheme.	
need to include "univerities and their extension services"...	
...promote efforts by universities and their extension services, consulting foresters...	...promote efforts by universities and their extension services, consulting foresters,...
	Performance Measure 17.1. Program Participants shall support and promote efforts by consulting foresters, state, provincial and federal agencies, state or local groups, professional societies, conservation organizations, indigenous peoples and governments, community groups sporting organizations, labor organizations, and the American Tree Farm System® and other landowner cooperative programs to apply principles of sustainable forest management.

Indicators:

1. Support for efforts of SFI Implementation Committees.
2. Support for the development of educational materials for use with forest landowners (e.g. information packets, websites, newsletters, workshops, tours, etc.).
3. Support for the development of regional, state or provincial information materials that provide landowners with practical approaches for addressing special sites and biological diversity issues, such as invasive exotic plants and animals, specific wildlife habitat, Forests with Exceptional Conservation Value, and threatened and endangered species.
4. Participation in efforts to support or promote conservation of managed forests through voluntary market-based incentive programs such as current-use taxation programs, Forest Legacy, or conservation easements.
5. Program Participants are knowledgeable about credible regional conservation planning and priority-setting efforts that include a broad range of stakeholders. Consider the results of these efforts in planning where practical and consistent with management objectives.

Rationale for proposed change:	Proposed New Language:
	3. Support for the development of regional, state or provincial information materials that provide landowners with practical approaches for addressing special sites and biological diversity issues, such as invasive exotic plants and animals, specific wildlife habitat, Forests with Exceptional Conservation Value, and threatened and endangered species (or species at risk - canadian terminology)
#4 "support or promote "conservation" of managed forests". In your definition of conservation, it says sustaining its productivity in perpetuity. Is this all resources including timber. When some think of conservation thru the programs listed, they think of not harvesting timber. I think the timber industry should give much consideration to supporting programs that tie up	

<p>timberlands and take them out of the market place. I agree with conserving some but how much. I think this area needs some clarification.</p>	
<p>Indicator 1: Why has SFI Inc. not posted the website addresses (of those SIC's who manage websites) in the links section of the SFI Inc. website? I do not have a problem with the indicator, I was just wondering why SFI Inc. has not posted the links to those groups to increase the awareness of their existence.</p>	
<p>Concern 17.1.3: To be complete, the indicator should also mention "species at risk," the term used in Canada.</p>	<p>Recommendation 17.1.3: "...Forests with Exceptional Conservation Value, and threatened and endangered species or species at risk."</p>
<p>Indicator 17.1.3: To be complete, the indicator should also mention "species at risk," the term used in Canada.</p>	
<p>Where credible conservation plans and priority-setting exercises exist, they should be taken into account. The way this is currently worded, does not constitute auditable standards language.</p>	<p>Suggested to remove the phrase "where practical and when consistent with management objectives" or "consider the results" in two locations-landscape assessments and conservation planning.</p>

Use this space to propose any new Indicators to Performance Measure 17.1:

Performance Measure 17.2 . Program Participants shall support and promote, at the state, provincial or other appropriate levels, mechanisms for public outreach, education, and involvement related to sustainable forest management.

Rationale for proposed change:	Proposed New Language:
<p>The XXXXX would like to see the role and goals for SICs more clearly defined. The SIC Annual Report to SFI, Inc. appears to encourage public outreach projects such as Habitat for Humanity. Yet Briefing Note #19 seems to limit the SIC role to logger and landowner education.</p>	

<p>Indicators:</p> <ol style="list-style-type: none"> 1. Periodic educational opportunities promoting sustainable forestry, such as <ol style="list-style-type: none"> a. field tours, seminars, or workshops; b. educational trips; c. self-guided forest management trails; or d. publication of articles, educational pamphlets, or newsletters. e. Support for state, provincial, and local forestry organizations and soil and water conservation districts. 	
Rationale for proposed change:	Proposed New Language:
<p>Internet was not included.</p>	<p>f. internet and websites</p>

Use this space to propose any new Indicators to Performance Measure 17.2:

Performance Measure 17.3. Program Participants shall establish, at the state, provincial, or other appropriate levels, procedures to address concerns raised by loggers, consulting foresters, employees, the public, or Program Participants regarding practices that appear inconsistent with the SFI Standard principles and objectives.

Rationale for proposed change:

Employees are in a subordinate position to program participants who are their employers. Asking them to report to their employers may put their employment at risk.

Proposed New Language:

Performance Measure 17.3. Program Participants shall establish, at the state, provincial, or other appropriate levels, procedures to address concerns raised by loggers, consulting foresters, employees and their unions, the public, or Program Participants regarding practices that appear inconsistent with the SFI Standard principles and objectives.

Indicators:

1. Support for SFI Implementation Committee efforts (toll-free numbers and other efforts) to address concerns about apparent nonconforming practices.
2. Process to receive and respond to public inquiries.

Rationale for proposed change:

Proposed New Language:

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Use this space to propose any new Indicators to Performance Measure 17.3:
 Add: "Documentation of types of inquiries and any actions that need to be taken."

Please use this space to propose any additional Performance Measures and Associated Indicators for Objective 17

Objective 18: Public Land Management Responsibilities. To improve the practice of sustainable forest management on public lands.	
Rationale for proposed change:	Proposed New Language:
The use of the word improve implies that we are doing something wrong or have practices which need improvement. Perhaps use the word promote instead. It has been used in other sections throughout the Standard.	Public Land Management Responsibilities. To promote the practice of sustainable forest management on public lands.
This objective is negatively worded as it suggests that current practices are substandard.	Suggested alternative wording is "To promote and implement the practice of sustainable forest management on public lands."
Concern: Emphasis on First Nations could be stronger; i.e. "...shall confer with affected first nations" is a bit weak.	Recommendation: Address First Nations communities in the related indicators.
Since public land management is not generally in the participant's direct control, "encourage" sustainable forest management on public lands is more realistic than "improve".	To encourage the practice of sustainable forest management on public lands.

<p>What if we have procurement operations that do not purchase wood from public lands? Are we still required to complete this objective? If so - In what ways can we accomplish this objective?</p>	
<p>I get confused with this topic, because the implication is that public lands either can not be certified or have a lower threshold or special certification standard just for public lands. The Standard's own definition of public lands states they are enrolled in the SFI program. Aren't public lands able to manage sustainably just like private landowners?</p>	

<p>Performance Measure 18.1. Program Participants with forest management responsibilities on public lands shall participate in the development of public land planning and management processes.</p>	
<p>Rationale for proposed change:</p>	<p>Proposed New Language:</p>
<p>Is this active participation, e.g. funding or just through consultation or review participation?</p>	

<p>Indicators:</p> <ol style="list-style-type: none"> 1. Involvement in public land planning and management activities with appropriate governmental entities and the public.
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2. Appropriate contact with local stakeholders over forest management issues through state, provincial, federal, or independent collaboration.

Rationale for proposed change:

Proposed New Language:

Use this space to propose any new Indicators to Performance Measure 18.1:

Performance Measure 18.2. Program Participants with forest management responsibilities on public lands shall confer with affected indigenous peoples.

Rationale for proposed change:

Proposed New Language:

Indicator:

1. Program that includes communicating with affected indigenous peoples to enable Program Participants to

a. understand and respect traditional forest-related knowledge;

b. identify and protect spiritually, historically, or culturally important sites; and

c. address the sustainable use of nontimber forest products of value to indigenous peoples in areas where Program Participants have management responsibilities on public lands

Rationale for proposed change:	Proposed New Language:
The meaning of Indicator 1.c is unclear.	Remove Indicator 1.c.

Use this space to propose any new Indicators to Performance Measure 18.2:

Please use this space to propose any additional Performance Measures and Associated Indicators for Objective 18

Objective 19. Communications and Public Reporting. To broaden the practice of sustainable forestry by documenting progress and opportunities for improvement.

Rationale for proposed change:	Proposed New Language:
The supporting statement for Objective 19 does not reflect what is desired but	Objective 19. Communications and Public Reporting

what Program Participants shall do (document). The supporting statement for communication should express why Program Participants shall document progress.	Substantiate the effective implementation of sustainable forestry principles.
The supporting statement doesn't reflect what the purpose of the objective is; only what the participant shall do. This should be rewritten to be above the language in the Performance Measures.	"Substantiate the effective implementation of sustainable forestry principles."

Performance Measure 19.1. A Certified Program Participant shall provide a report, prepared by the certification body, to the SFI Inc. after the successful completion of certification, recertification, or surveillance audit to the 2010-2014 SFI Standard.	
Rationale for proposed change:	Proposed New Language:
not just any "report"	... a "summary audit report".....
For transparency why not have the certification body submit the report.	The certification body shall prepare and provide a report to the SFI INC. after...
provide a report will cause confusion because there are several types of reports. Instead, insert the word "summary" in front of the word "report"	...shall provide a summary report, prepared by the ...
I thought this was always required.	

Indicator

1. The public report, shall include, at a minimum,
 - a. a description of the audit process, objectives, and scope;
 - b. a description of substitute indicators, if any, used in the audit and a rationale for each;
 - c. the name of Program Participant that was audited, including its SFI representative;
 - d. a general description of the Program Participant's forestland and manufacturing operations included in the audit;
 - e. the name of the certification body and lead auditor (names of the audit team members, including technical experts may be included at the discretion of the audit team and Program Participant);
 - f. the dates the certification was conducted and completed;
 - g. a summary of the findings, including general descriptions of any nonconformities and corrective action plans to address them, opportunities for improvement, and exceptional practices; and
 - h. the certification decision.

The public report will be posted on the SFI Inc. website and available for public review.

Rationale for proposed change:	Proposed New Language:

Use this space to propose any new Indicators to Performance Measure 19.1:

Performance Measure 19.2. Program Participants shall report annually to SFI Inc. on their conformance with the SFI Standard.

Rationale for proposed change:

Proposed New Language:

Indicators:

1. Prompt response to the SFI annual progress report.
2. Recordkeeping for all the categories of information needed for SFI annual progress reports.
3. Maintenance of copies of past reports to document progress and improvements to demonstrate conformance to the SFI Standard.

Rationale for proposed change:

Proposed New Language:

This is an unreasonable amount of recordkeeping. Indicator 3 should be limited to 5 years worth of copies.

3. Maintenance of copies of reports for the last 5 years to document progress and improvements to demonstrate conformance to the SFI Standard.

This is an unreasonable amount of recordkeeping. Indicator #2 should be limited to summary sheets. Indicator #3 should be limited to 3-5 years worth of copies.

2. Summary sheets for all the categories of information needed for SFI annual progress reports.

3. Maintenance of copies of reports for the last 3 to 5 years to document

	progress and improvements to demonstrate conformance to the SFI Standard.
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Use this space to propose any new Indicators to Performance Measure 19.2:

Please use this space to propose any additional Performance Measures and Associated Indicators for Objective 19

Objective 20. Management Review and Continual Improvement. To promote continual improvement in the practice of sustainable forestry and monitor, measure, and report performance in achieving the commitment to sustainable forestry.	
Rationale for proposed change:	Proposed New Language:

Performance Measure 20.1. Program Participants shall establish a management review system to examine findings and progress in implementing the SFI Standard, to make appropriate improvements in programs, and to inform their employees of changes.

Rationale for proposed change:	Proposed New Language:

<p>Indicators:</p> <ol style="list-style-type: none"> 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 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 Standard. 	
Rationale for proposed change:	Proposed New Language:

Use this space to propose any new Indicators to Performance Measure 20.1:

Please use this space to propose any additional Performance Measures and Associated Indicators for Objective 20

afforestation: The establishment of a forest or stand in an area where the preceding vegetation or land use was not forest.	
Rationale for proposed change:	Proposed New Language:

Alliance for Zero Extinction: a global initiative of biodiversity conservation organizations, 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.	
Rationale for proposed change:	Proposed New Language:
References to a single organization will date the new revisions. Recommend it be deleted.	
This is unnecessary.	Remove definition for Alliance of Zero Extinction.

American Tree Farm System®: A national program that promotes the sustainable management of forests through education and outreach to private forest landowners.	
Rationale for proposed change:	Proposed New Language:

aquatic fauna: Animals that live on or within water during some stage of their development.	
Rationale for proposed change:	Proposed New Language:

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.	
Rationale for proposed change:	Proposed New Language:

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artificial regeneration: The establishment of a group or stand of young trees created by direct seeding or by planting seedlings or plantlets.	
Rationale for proposed change:	Proposed New Language:

available regulatory action information: Statistics or regulatory compliance data collected by a federal, state, 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.	
Rationale for proposed change:	Proposed New Language:

auditor: A person with the competence to conduct an audit (ISO 19011:2002, 3.8).	
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Rationale for proposed change:	Proposed New Language:

audit team: One or more auditors conducting an audit, supported if needed by technical experts (ISO 19011:2002, 3.9).

Rationale for proposed change:	Proposed New Language:

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.

Rationale for proposed change:	Proposed New Language:
The definition of “best management practices” needs to be broadened to include Canadian legislated practices through Acts and Regulations:	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 o alternative practice, 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. Where legislation exists governing the protection of water quality, then the BMP will default to the legislated requirements.”
"protection of water quality" is a good addition	
Social considerations need to be included, especially if there is concern about sensitive sites from a cultural standpoint.	Change end to “environment and social considerations.”

best scientific information: Available factual information that is generally accepted by the broad scientific community, including but not limited to peer-reviewed scientific information obtainable from any source, including government and nongovernmental sources, that has been verified by field testing to the maximum extent feasible.	
Rationale for proposed change:	Proposed New Language:

biodiversity hotspots: A biogeographic conservation region with more than 1,500 endemic plant species and less than 30 percent of its historical extent.

Rationale for proposed change:	Proposed New Language:

<p>bioenergy feedstock - Biomass used for the production of renewable energy. Biomass includes any organic products and by-products derived from trees, plants and other biological organic matter, including limbs, bark, and other cellulosic material, organic byproducts from wood pulping, and other biologically derived materials.</p>	
Rationale for proposed change:	Proposed New Language:
Concern: The term “renewable” is unnecessary.	Recommendation: Delete the word “renewable” prior to “energy.”
This is an emerging science and should not be included in the standard.	Remove definition of bioenergy feedstock.
The word “renewable” is superfluous and is not a necessary modifier for “energy.”	We recommend deleting “renewable.”
	Add definition for biomass to list of defined terms.
"bioenergy" is not a commonly used term. It's unclear.	"Biomass feedstock"

biological diversity, biodiversity: The variety and abundance of life forms, processes, functions, and structures of plants, animals, and other living organisms,

including the relative complexity of species, communities, gene pools, and ecosystems at spatial scales that range from local to regional to global.	
Rationale for proposed change:	Proposed New Language:
The current definition is completely static, but biological systems are not. Invasive species and introduced species can measurably increase species richness through their addition to total counts of species, but are not desirable. The temporal aspect and native varieties of species needs to be worked in.	"The natural and historical range in the variety and abundance of life forms..."

<p>certification Body: an independent third party that is accredited by:</p> <p>ANAB - ANSI-ASQ National Accreditation Board as being competent to conduct certifications to the 2005-2009 SFI Standard.</p> <p>ANSI - American National Standards Institute as being competent to conduct certifications to the SFI Chain of Custody Standard.</p> <p>SCC – Standards Council of Canada as being competent to conduct certifications to the 2005-2009 SFI Standard and the SFI Chain of Custody Standard.</p>	
Rationale for proposed change:	Proposed New Language:
reference incorrect standard	change 2005-2009 SFI Standard to 2010-2014 SFI Standard

certified logging professional: A person with specialized skills in timber harvesting gained through experience or formal training who has successfully completed wood producer training programs recognized by SFI Implementation Committees and has successfully completed, and is a member in good standing, of a logger

certification program.	
Rationale for proposed change:	Proposed New Language:
Most logger certification programs are not certifying individual loggers, but logging businesses. This adds continuity to the program and makes the business itself responsible for its actions, not an individual. A change in the definition is needed to reflect this.	certified logging professional: a business or organization with specialized skills in timber harvesting.....
SFI definition of certified logging professional is vague, and the standard does not define a logger certification program.	a logging business that has successfully achieved certification status under a program that has been recognized by SFI as having met the indicators in performance measure 9.2.
The terms “certified logging professionals”, and “qualified logging professionals” are used throughout Objective 9, Objective 10 and the term “wood producers” is used in Objective 16. This is very confusing and requires clarification as to what applies where and to whom. Additionally it would provide more clarity if it states and/or when referring to certified logging professionals, qualified logging professionals if they are interchangeable.	
The draft definition is too vague and does not differentiate between a third-party certified logger and a “certified” logger. SFI needs to define “logger certification program” and develop a template to assess logger certification programs against (see our proposed performance measure 9.2). For example, some state logger training and education (LT&E) programs refer to those loggers who complete the program’s training requirements as “certified”. These types of “certification” programs often only require individuals to meet certain qualifications, including work experience and training programs. This does not mean that audits of the actual harvest and business practices for each certified logger are conducted. Further, there are also LTE programs that refer to their members as Master Loggers (e.g. Kentucky Master Logger), but this is not the same as Master Logger Certification.	We recommend SFI define certified logging professional as: a logging business that has successfully achieved certification status under a program that has been recognized by SFI as having met the indicators in the proposed performance measure 9.2.

Move this definition to "qualified logging professional".	
Many will confuse this term with the trained person who has completed the SIC approved training. Suggest you give an example.	...standing, of a certification program, for example the ALC's Certified Master Logger program.
The difference between certified logging professional and qualified logging professional is unclear. This needs further clarification in the definitions section of the Standard.	
CHANGE DEFINITION: Qualified/certified logging professionals MUST include "A person or an organization". Defining the professional entity as only a person is unrealistic and inconsistent with the SFI Standard. Why then is a "wood producer" a "person or an organization"? Why is a SFI certified entity not just the person or CEO? Why would you make the logging company owner the ONLY "qualified/certified" entity?	CHANGE DEFINITION: "A person or an organization" with specialized skills...
The draft definition is too vague and does not differentiate between a third-party certified logger and a "certified" logger. SFI needs to define "logger certification program" and develop a template to assess logger certification programs against (performance measurer 9.2). For example, some state logger training and education (LT&E) programs refer to those loggers who complete the program's training requirements as "certified". These types of "certification" programs often only require individuals to meet certain qualifications, including work experience and training programs. This does not mean that audits of the actual harvest and business practices for each certified logger are conducted. Further, there are also LTE programs that refer to their members as Master Loggers (e.g. Kentucky Master Logger), but this is not the same as Master Logger Certification.	We recommend SFI define certified logging professional as: a logging business that has successfully achieved certification status under a program that has been recognized by SFI as having met the indicators in performance measurer 9.2.

certified program participant is a forest landowner, forest land manager, primary or secondary forest products producer operating in the U.S. or Canada who participates in the SFI program through a contractual agreement to abide by the 2010-2014 SFI Standard, and who has been certified by an accredited SFI certification body to be in conformance with the SFI Standard.

Rationale for proposed change:

Proposed New Language:

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

Rationale for proposed change:

Proposed New Language:

controversial sources: Use of controversial sources are not allowed in SFI-labeled products. Controversial sources include illegal logging and fiber sourced from areas without effective social laws.

illegal logging: the theft of timber or logs and cutting in parks, reserves, or other similar areas where otherwise precluded by law. See Annex 1 (Appendix 2) and Annex 2 (Appendix 4) for SFI Inc.'s policy on illegal logging.

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. antidiscrimination and anti-harassment measures;
5. prevailing wages; and
6. workers' right to organize.

Rationale for proposed change:	Proposed New Language:
the term "illegal logging" is a misrepresentation of the activity that the standard is addressing. It is also a "black eye" on the logging industry as a whole. The term should be called "Illegal procurement practices."	illegal procurement practices - the purchase of timber or logs illegally harvested either by theft or cutting in parks, reserves, or other similar areas where otherwise precluded by law.
	controversial sources: Use of controversial sources are not allowed in SFI-labeled products. Controversial sources include illegal logging and fiber sourced from areas without effective social measures.
Recommend a more robust definition of controversial sources.	See WWF Global Forest & Trade Network's definition of Unwanted Sources

<p>Illegal Logging. This is a very narrow definition. We recommend a definition along the lines of the following (see below).</p>	<p>(http://assets.panda.org/downloads/rpg_nopapercredit12sept2006.pdf), or FSC's Controlled Wood categories for reference (www.fsc.org).</p> <p>Illegal logging (and related trade and corruption)-Harvesting or trading of timber in violation of relevant national or sub-national laws, or access to forest resources or trade in forest products that is authorized through corrupt practices.</p>
<p>Concern: Social "laws" may not be applicable.</p>	<p>Recommendation: Replace "laws" with "measures". Suggest: "Use of controversial sources are not allowed in SFI-labeled products. Controversial sources include illegal logging and fiber sourced from areas without effective social measures."</p>
<p>The term "laws" at the end of controversial sources should be replaced with "measures" to take into account countries without effective social laws where measures have been taken to compensate for the lack of law.</p>	
<p>Reader cannot find "illegal logging" in alphabetical location in DEFINITIONS.</p> <p>7. What about illegal immigrant worker status?</p>	<p>Illegal Logging: make reference or redirect reader from where this should be--to this illogical place where you decided to put it.</p> <p>7. legal immigrant worker status</p>
<p>c. Illegal logging (revise to expand scope to include relevant national or sub-national laws or access is granted through corrupt practices). Task force noted that illegal logging is already defined and includes timber harvested where precluded by law. Yes, it is already defined in a very limited way that would allow certain types of illegally logged material to come into SFI product streams.</p>	

critically imperiled: Globally extremely rare or, because of some factor(s), especially vulnerable to extinction. Typically, five or fewer occurrences or populations remain, or very few individuals (<1,000), acres (<2,000 acres or 809 hectares), or linear miles (<10 miles or 16 kilometers) exist. Often referred to as G1.

Rationale for proposed change:	Proposed New Language:

culturally important: having significance for or being representative of human activities or beliefs (e.g., areas such as cemeteries, sacred sites, battlefields)

Rationale for proposed change:	Proposed New Language:
<p>We have concerns about the items included as "e.g." - sacred sites and battlefields. With regard to sacred sites, this opens the door for anyone to declare any place a "sacred site". We'd prefer language that states "documented sacred site, such as a church or recognized Native American cultural area". With regard to battlefields, much of the southern United States can be considered a battlefield. Often parts of battlefields are actively managed forests, which actually protects them from fragmentation or development. Should drop battlefield as one of the e.g. examples.</p>	<p>culturally important: having significance for or being representative of human activities or beliefs</p>

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

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

Rationale for proposed change:

Proposed New Language:

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

Rationale for proposed change:

Proposed New Language:

ADD: ECOSYSTEM SERVICES

Add a definition of ecosystem services.

Add a definition of ecosystem services.

exotic tree species: A tree species introduced from outside its natural range, excluding species that have become "naturalized" in the area and have a naturally reproducing population. (Note: Hybrids of native species or native plants that have been derived from genetic tree improvement and biotechnology programs are not considered exotic species.)

Rationale for proposed change:	Proposed New Language:

forest health: The perceived condition of a forest derived from concerns about such factors as its age, structure, composition, function, vigor, presence of unusual levels of insects or disease, and resilience to disturbance.

Rationale for proposed change:	Proposed New Language:

forestry: The profession embracing the science, art, and practice of creating, managing, using, and conserving forests and associated resources for human benefit and in a sustainable manner to meet desired goals, needs, and values.

Rationale for proposed change:	Proposed New Language:

forestry enterprise: A business engaged in the management of forestland, having its own functions and administration and comprising one or more operating units.	
Rationale for proposed change:	Proposed New Language:

Forests with Exceptional Conservation Value: critically imperiled and imperiled species and communities.	
Rationale for proposed change:	Proposed New Language:
Clarify to specify: global (G1,G2) critically imperiled and imperiled species and communities.	Forests with Exceptional Conservation Value: critically imperiled (G1) and imperiled (G2) species and communities.
Describing either a species or an ecological community as a 'forest' is a misnomer and it is a concern that it will result in a wide range of interpretations of protection requirements. Protection of ecological communities is normally achieved at a small stand level scale whereas a 'forest' can be expanded out to the landscape or regional level. Requirements to protect sessile or immobile species will normally require protection at a small stand scale, not a forest per se. Species having large ranges will likely only require protection of habitat key their life cycle at locations scattered across the landscape to in order to ensure their continued survival. Again, protection of a 'forest' would not be necessary as exclusion of harvesting in a 'forest' is usually not necessary to protect a species.	Delete all references in the draft standard to 'Forests with Exceptional Conservation Value' OR change to 'Species and Ecological Communities having Exceptional Conservation Value'.

Recommend a more robust definition for reasons stated in previous comments.	See High Conservation Value Forest definition for reference (www.hcvnet.org)
Suggest working on this definition to structure it similar to the High Conservation Value Forest definition that FSC has put in place.	
This seems too cryptic. Are you inferring that the species entire habitat is the forest? What if it is in an aquatic habitat is it the entire watershed? Shouldn't it say natural communities?	Forests with Exceptional Conservation Value: the immediate forested habitat of critically imperiled (G1) and imperiled imperiled (G2) species and natural communities.
Upon reviewing the definition, it appears to XXXXX that this is specifically referring to G1 & G2 species and communities. If this is indeed the case, SFI should directly state this in the definition.	Change the definition to reference G1 & G2 species and communities
b. High Conservation Value Forests. Task force noted FECV is the equivalent term that SFI uses and defines. Our recommendation is that SFI builds landscape-scale conservation provisions into the SFI standard, regardless of whether "HCVF" terminology is used. Also, the current definition/process for FECV is not equivalent to HCVF.	

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 micropropagation, tissue culture, and somatic embryogenesis; and genetic engineering (GE), which is the physical manipulation and asexual insertion of genes into organisms.	
Rationale for proposed change:	Proposed New Language:

geographic information system (GIS): An organized collection of computer systems, personnel, knowledge, and procedures designed to capture, store, update, manipulate, analyze, report, and display forms of geographically referenced information and descriptive information.

Rationale for proposed change:	Proposed New Language:

green-up requirement: Previously clearcut harvest areas must have trees at least 3 years old or 5 feet high at the desired level of stocking before adjacent areas are clearcut.

Rationale for proposed change:	Proposed New Language:
The definition is of A green-up requirement. Depending on location that management is occurring, this could be significantly different.	green-up requirement: A set of standards in which regeneration of trees in previously clearcut harvested areas meet a desired age or height at a desired stocking level before adjacent areas are clearcut.

growing stock: All the trees growing in a forest or in a specified part of it, meeting specified standards of size, quality and vigor, and generally expressed in terms of number or volume.

Rationale for proposed change:	Proposed New Language:

growth-and-yield model: A set of relationships, usually expressed as equations and embodied in a computer program or tables, that provides estimates of future stand development given initial stand conditions and a specified management regime.

Rationale for proposed change:	Proposed New Language:

growth and drain: The average annual net increase in the volume of trees during the period between inventories (including the increment in net volume of trees at the beginning of the specific year surviving to its end, plus the net volume of trees reaching the minimum size class during the year, minus the volume of trees that died during the year, and minus the net volume of trees that became cull trees during the year) minus the net volume of growing stock trees removed from the inventory during a specified year by harvesting, cultural operations such as timber stand improvement, or land clearing.

Rationale for proposed change:	Proposed New Language:

habitat: 1. A unit area of environment. 2. The place, natural or otherwise (including climate, food, cover, and water) where an individual or population of animals or plants naturally or normally lives and develops.

Rationale for proposed change:

Proposed New Language:

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.

Rationale for proposed change:

Proposed New Language:

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

Rationale for proposed change:	Proposed New Language:

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

Rationale for proposed change:	Proposed New Language:

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.

Rationale for proposed change:	Proposed New Language:
As per previous comments, "exotic" and "invasive" are 2 different things. Please separate.	

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.

Rationale for proposed change:	Proposed New Language:
Forest inventory vs. other inventories is not clearly distinguished (soil inventory is mentioned in the above as are inventory systems). The definition more often now refers to the spatial data used in an inventory GIS layer.	Add: "3. A spatial layer used in forest resource planning that contains the spatial occurrences of data from such as survey."

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.

Rationale for proposed change:	Proposed New Language:

land classification: The process of designating areas of land into classes or strata that are sufficiently homogeneous in their physical, vegetative, and development attributes.

Rationale for proposed change:	Proposed New Language:

<p>landscape: 1. A spatial mosaic of several ecosystems, landforms, and plant communities across a defined area irrespective of ownership or other artificial boundaries and repeated in similar form throughout. 2. An area of land characterized by</p> <ul style="list-style-type: none"> • 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). 	
Rationale for proposed change:	Proposed New Language:
<p>It is strange that large megafauna are singled out in the definition as not relevant to a landscape. In sustainable wildlife management megafauna are often the indicator species used in determining the viability of a landscape for conservation purposes. Drop the existing example.</p>	

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

Rationale for proposed change:	Proposed New Language:

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

<p>long-term: Extending over a relatively long time period-for the SFI Standard this means the length of one forest management rotation or longer.</p>	
Rationale for proposed change:	Proposed New Language:

major tropical wilderness areas: The world's largest-remaining tracts of tropical forest that are more than 75 percent intact. These areas are characterized by extraordinary biological richness, including exceptional concentrations of endemic species, and are also of crucial importance to climate regulation, watershed protection, and maintenance of traditional indigenous lifestyles.

Rationale for proposed change:	Proposed New Language:

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

Rationale for proposed change:	Proposed New Language:

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

Rationale for proposed change:	Proposed New Language:

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

Rationale for proposed change:	Proposed New Language:

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

Rationale for proposed change:	Proposed New Language:

natural regeneration: The establishment of a plant or a plant age class from natural seeding, sprouting, suckering, or layering.	
Rationale for proposed change:	Proposed New Language:

nonforested wetland: A transitional area between aquatic and terrestrial ecosystems that does not support tree cover and is inundated or saturated for periods long enough to produce hydric soils and support hydrophytic vegetation.	
Rationale for proposed change:	Proposed New Language:

objective: In the SFI Program, a fundamental goal of sustainable forest management as embodied in objectives 1–13 of the SFI Standard.	
Rationale for proposed change:	Proposed New Language:
incorrect reference 20 objectives in the draft standards	objectives 1-20

old-growth forests: A forested ecosystem distinguished by old trees and related structural attributes, such as tree size, down woody debris, canopy levels, and species composition. Program Participants should utilize a definition specific to their region and particular forest types.

Rationale for proposed change:

Proposed New Language:

other wood supplier: A person or organization who infrequently supplies wood fiber on a small scale. Examples include farmers and small-scale land-clearing operators.

Rationale for proposed change:

Proposed New Language:

performance measure: In the SFI Program, a means of judging whether an objective has been fulfilled.

Rationale for proposed change:	Proposed New Language:

policy: A written statement of commitment to meet an objective or to implement a defined program or plan to achieve an objective or outcome.	
Rationale for proposed change:	Proposed New Language:

principle: In the SFI Program, the vision and direction for sustainable forest management as embodied in principles 1–9 of the SFI Standard.	
Rationale for proposed change:	Proposed New Language:
incorrect reference - 14 principles in draft standard	principles 1 - 14

procurement: 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.	
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Rationale for proposed change:	Proposed New Language:
Particular attention should be paid to whether the Standard uses the term “fiber sourcing” or “procurement.” In business, there is not much difference between them conceptually, but if public perception is considered, “fiber sourcing” may carry more meaning. To avoid confusion, we recommend that only one of the terms -- “fiber sourcing” or “procurement” -- be defined and used appropriately.	

productivity: The inherent capacity of a particular site or ecosystem to produce a crop or tree stand, often measured in volume or height.	
Rationale for proposed change:	Proposed New Language:

program: An organized system, process, or set of activities to achieve an objective or performance measure.	
Rationale for proposed change:	Proposed New Language:

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<p>program participant: A forest landowner, forest land manager, primary or secondary forest products producer operating in the US or Canada who participates in the SFI program through a contractual agreement to abide by the 2010-2014 SFI Standard.</p>	
Rationale for proposed change:	Proposed New Language:

<p>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.</p>	
Rationale for proposed change:	Proposed New Language:

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

Rationale for proposed change:

This definition of Public Land omits the U.S. Forest Service, many State lands, county and local lands which are currently not enrolled in the SFI program from Principle 12 - Public Involvement: To broaden the practice of sustainable forestry on public lands through community involvement.

Proposed New Language:

public land: Land 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: Procurement of standing timber under a contractual agreement that gives the Program Participant the right and obligation to harvest the timber.

Rationale for proposed change:

The term “procurement” in the definition identifies a process or activity and should be deleted.

Proposed New Language:

“standing timber under a contractual agreement that gives the 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 recognized by SFI Implementation Committees as meeting the spirit and intent of performance measure under Objective 8 of the SFI Standard.

a. For a logging crew to be considered trained, each crew must operate under the direction of an individual, with on-site responsibility, who has completed the SIC 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 an individual logger'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.

Rationale for proposed change:	Proposed New Language:
wrong objective reference	Objective 9
<p>The terms "certified logging professionals", and "qualified logging professionals" are used throughout Objective 9, Objective 10 and the term "wood producers" is used in Objective 16. This is very confusing and requires clarification as to what applies where and to whom. Additionally it would provide more clarity if it states and/or when referring to certified logging professionals, qualified logging professionals if they are interchangeable. Additionally section b references Objective 8 of the standard which is an incorrect reference.</p>	
<p>Recommend b. be rewritten for clarity, and to better match what actually occurs (with SIC approval) in some states at present</p>	<p>We recommend (b.) be rewritten as follows: A logger or harvesting professional is considered to be trained when they have completed, or be in the process of completing within a time frame established by the SIC, state SIC-approved logger training.</p>
<p>References to "on site responsibility" require an accredited individual to be on a logging job. This is just not practical or necessary. An accredited individual should, however, have supervisory responsibility for the crew.</p> <p>Also, this is a better place for the "certified logging professional". The</p>	<p>a) For a logging crew to be considered trained, each crew must operate under the direction of an individual, with supervisory responsibility, who has completed a SIC approved state or provisional training program.</p> <p>c) Attach definition of a certified logging professional here.</p>

<p>language between certified and qualified gets confusing in the standard. It's also redundant. It would be much more effective to only use the term "qualified logging professional" in the standard</p> <p>with a "certified logging professional included in this definition.</p>	
<p>Objective 8 should actually be referenced as Objective 16.</p>	<p>Change reference to Objective 16.</p>
<p>The definition should now refer to Objective 9, not Objective 8.</p>	
<p>Under II.A of the SIC Governance White Paper, the SIC is responsible for defining what is a trained logger in the respective state. The last sentence in "b" above will confuse that because most SICs are very mature and have already defined their renewal, delinquency, continuing ed process. This explanation will be very confusing because some states will pull a loggers card for not completing their continuing ed requirement.</p>	<p>Delete the last sentence in "b", above</p>

<p>CHANGE DEFINITION: Qualified/certified logging professionals MUST include "A person or an organization". Defining the professional entity as only a person is unrealistic and inconsistent with the SFI Standard. Why then is a "wood producer" a "person or an organization"? Why is a SFI certified entity not just the person or CEO? Why would you make the logging company owner the ONLY "qualified/certified" entity? Please don't discriminate against logging firm by dictating that every employee must be a QLP.</p> <p>b. A logging company should be the point of reference, for the aforementioned reasons.</p>	<p>CHANGE DEFINITION of QLP: "A person or an organization" with specialized skills...</p> <p>b. CHANGE WORDING: ...should be based on a logging firm's commitment to the professional training program.</p>
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<p>qualified resource professional: A person who by training and experience can make forest management recommendations. Examples include foresters, soil scientists, hydrologists, forest engineers, forest ecologists, fishery and wildlife biologists or technically trained specialists in such fields.</p>	
<p>Rationale for proposed change:</p>	<p>Proposed New Language:</p>
<p>Definition examples should include certified logging professionals who have experience and have completed training and are "specialists" in what they do as a part of the total package of forest management operations. The certified logger has been audited for his/her on the ground operations and not just gone thru the classroom training like the qualified logging professional. Another way to give recognition to certified logging businesses and increase the credibility of the SFI program.</p>	<p>....Examples include foresters, soil scientists, hydrologists.....certified logging professionals, or technically trained specialists in such fields.</p>
<p>The definition should refer to Objective 9, and not Objective 8.</p>	<p>The definition should refer to Objective 9, and not Objective 8.</p>

<p>reforestation: The reestablishment of forest cover either naturally or artificially (direct seeding or planting of seedlings).</p>	
<p>Rationale for proposed change:</p>	<p>Proposed New Language:</p>
<p> </p>	<p> </p>

<p>riparian: Related to, living in, or located in conjunction with a wetland, on the bank of a river or stream or at the edge of a lake or tidewater.</p>	
<p>Rationale for proposed change:</p>	<p>Proposed New Language:</p>
<p>Amend the definition of “riparian” to include the function of wildlife habitat</p>	<p> </p>

<p>second-party verification: Verification of an enterprise’s performance conducted by an affiliated or interested group, such as a forest products trade association, another forestry enterprise, or a customer.</p>	
<p>Rationale for proposed change:</p>	<p>Proposed New Language:</p>
<p> </p>	<p> </p>

Not an option under the current SFI Standard.	Remove the definition.
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SFI certification: A systematic and documented verification process to obtain and evaluate evidence objectively to determine whether a Program Participant's SFI Program conforms to the SFI Standard.

Rationale for proposed change:	Proposed New Language:

SFI Implementation Committee (SIC): A state, provincial, or regional committee organized by SFI Program Participants to facilitate or manage the programs and alliances that support the growth of the SFI Program, including sustainable forest management.

Rationale for proposed change:	Proposed New Language:

silviculture: The art and science of controlling the establishment, growth, composition, health, and quality of forests and woodlands to meet the diverse needs

and values of landowners and society on a sustainable basis.

Rationale for proposed change:

Proposed New Language:

skid trail: A temporary path through the woods to transport felled trees or logs to a collection area for further transportation.

Rationale for proposed change:

Proposed New Language:

special sites: Sites that are ecologically, geologically, historically, or culturally important.

Rationale for proposed change:

Proposed New Language:

The definition of special sites lacks an adjective with the words ecologically, geologically and historically, as culturally important is a defined term, in essence one word, the word important does not modify the other three. Furthermore, the definition of culturally important uses "battlefields" as an

"Special site: Sites that include ecologically or geologically unique or culturally important features. "

<p>example, so historical importance is already covered, and the word “historical” is redundant. We suggest the adjective “unique” for both ecologically and geologically</p>	
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<p>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.</p>	
<p>Rationale for proposed change:</p>	<p>Proposed New Language:</p>

<p>sustainable forestry: To meet the needs of the present without compromising the ability of future generations to meet their own needs by practicing a land stewardship ethic that integrates reforestation and the managing, growing, nurturing, and harvesting of trees for useful products and ecosystem services with the conservation of soil, air and water quality, carbon, biological diversity, wildlife and aquatic habitat, recreation, and aesthetics.</p>	
<p>Rationale for proposed change:</p>	<p>Proposed New Language:</p>
<p>Reference to “carbon” in this principle is too vague. What sustainable forestry ensures is carbon sequestration.</p>	<p>sustainable forestry: To meet the needs of the present without compromising the ability of future generations to meet their own needs by practicing a land stewardship ethic that integrates reforestation and the managing, growing, nurturing, and harvesting of trees for useful products and ecosystem services with the conservation of soil, air and water quality, carbon sequestration,</p>

	biological diversity, wildlife and aquatic habitat, recreation, and aesthetics.
Previous comments submitted in Principles section with respect to SFI Inc. definition of sustainable forestry.	Proposed sustainable forestry definition submitted in Principles section.
Define: “...harvesting of trees for useful products and ecosystem services...” – include definition of ecosystem services in glossary	Define: “...harvesting of trees for useful products and ecosystem services...” – include definition of ecosystem services in glossary
Carbon is an emerging science and should not be included in the standard.	sustainable forestry: To meet the needs of the present without compromising the ability of future generations to meet their own needs by practicing a land stewardship ethic that integrates reforestation and the managing, growing, nurturing, and harvesting of trees for useful products and ecosystem services with the conservation of soil, air and water quality, biological diversity, wildlife and aquatic habitat, recreation, and aesthetics.
ecosystem services is an ambiguous term that is not defined.	Remove "and ecosystem services"

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.	
Rationale for proposed change:	Proposed New Language:

Sustainable Forestry Initiative Standard (SFI STANDARD): The principles, policies, objectives, performance measures, and indicators that detail specific requirements for Program Participants.

Rationale for proposed change:	Proposed New Language:

Sustainable Forestry Initiative Standard Audit Procedures and Qualifications (SFI APQ): The principles and guidelines that detail specific requirements to Program Participants and Certification bodies for conducting audits to the SFI Standard.

Rationale for proposed change:	Proposed New Language:

technical expert: A person who provides specific knowledge or expertise to the audit team (ISO 19011 2002, 3.10).

Rationale for proposed change:	Proposed New Language:

third-party certification: An assessment of conformance to the SFI Standard conducted according to the standards of the SFI APQ and ISO 19011 by a qualified certification body.

Rationale for proposed change:	Proposed New Language:

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.

Rationale for proposed change:	Proposed New Language:

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.

Rationale for proposed change:

Proposed New Language:

varietal seedlings: genetically identical individuals produced through vegetative reproduction methods, such as micropropagation, tissue culture or somatic embryogenesis.

Rationale for proposed change:

Proposed New Language:

verifiable monitoring system: A system capable of being audited by a third party that includes (a) a means to characterize the Program Participant's wood and fiber supply area, which may include sources certified to a standard that requires compliance with BMPs, including those sources from certified logging professionals; (b) a process to identify and use sources of available data (e.g., state monitoring programs, certification status of suppliers) in the use of BMPs and (c) a method to assess supplier performance, if needed, to supplement available data.

Rationale for proposed change:	Proposed New Language:

visual quality: The seen aspects of both the land and the activities that occur upon it.

Rationale for proposed change:	Proposed New Language:

visual quality management: Minimization of the adverse visual effects of forest management activities.

Rationale for proposed change:	Proposed New Language:

wildlife: Marine and freshwater aquatic and terrestrial fauna.

Rationale for proposed change:	Proposed New Language:
Awkward definition.	Wildlife: Aquatic (marine and freshwater) and terrestrial fauna.

wood and fiber supply area: The geographic area from which a Program Participant procures, over time, most of its wood and fiber from wood producers.	
Rationale for proposed change:	Proposed New Language:

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.	
Rationale for proposed change:	Proposed New Language:
The terms “certified logging professionals”, and “qualified logging professionals” are used throughout Objective 9, Objective 10 and the term “wood producers” is used in Objective 16. This is very confusing and requires clarification as to what applies where and to whom. Additionally it would provide more clarity if it states and/or when referring to certified logging	

professionals, qualified logging professionals if they are interchangeable.	
	<p>harvest plan - The harvest plan is a written document that addresses landowner objectives and reflects the requirements in the logger certification program standard. The harvest plan should include a sale map identifying the cutting area, cutting specifications and pertinent operational requirements and restrictions. In addition, the harvest plan should specifically address: regeneration, water quality, riparian, wildlife, endangered and threatened species and OSHA requirements.</p> <p>management plan - a detailed plan developed by a professional forester for a landowner which provides long range planning for the property, addresses landowner objectives, soil types, water & visual quality, wildlife, forest health, riparian areas and endangered and threatened species.</p>
Clarification of the differences between “wood producer” and “wood supplier” is necessary. “Wood supplier” is not in the definitions. As “wood supplier” and “wood producer” are not the same, the Standard needs a definition for “wood supplier”	“Wood Supplier: A person or organization that enters into a direct contract/agreement with a Program Participant for the sale and delivery of certain quantities of wood. A wood supplier can be a wood producer but a wood producer is not a wood supplier without the direct contract relationship to the Program Participant.”

Use this space to propose any new definitions:
Direct Supplier p. 25
"Carbon" and "Ecosystem services" is not currently defined and should be included.
ecosystem services - components of nature, directly enjoyed, consumed, or used to yield human well-being
agroforestry
biotechnology

direct supplier

“Wood Supplier: A person or organization that enters into a direct contract/agreement with a Program Participant for the sale and delivery of certain quantities of wood. A wood supplier can be a wood producer but a wood producer is not a wood supplier without the direct contract relationship to the Program Participant.”

The introduction makes a distinction between “agroforestry” and “bioenergy feedstock” but the Standard only defines the latter. To avoid confusion, “agroforestry” should be defined.

As “wood supplier” and “wood producer” are not the same, the Standard needs a definition for “wood supplier,” which is set out below under “wood producer.” The term “Direct Supplier” is used on page 25, but is not defined.

The term “ecosystem services” is not defined, and should be added.

pollinator habitat
ecosystem services

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

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

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

We recommend that you add definitions for “visual quality objectives,” “aquatic flora,” and “biomass.”

Audit report. Task force noted elements suggested were already included in the requirements for audit reports. Not the case. See above.

Representation—Task Force said no as this term is not used in the standard and therefore does not need to be defined.

Introduction

All certification, recertification and surveillance audits to the SFI Standard shall be conducted by certification bodies accredited by the SCC or 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.

Rationale for proposed change:	Proposed New Language:
<p>There is a strong concern that there will be a significant cost added when the recertification moves to 3 years from 5 years. It is unclear if participants still have the ability to have continuous certification over the 3 year time frame. The five year certification cycle should be retained. If that is not possible, then surveillance audits should be allowed during the three-year cycle.</p>	

Use this space to propose any additions to the Introduction:

<p>1. Scope</p> <p>This SFI Audit Procedures and Qualifications document supports the International Standard ISO 19011:2002 Guidelines for quality and/or environmental management systems auditing by providing specific requirements to Program Participants and certification bodies. It is applicable to all forest management and wood procurement organizations when conducting third-party certification, recertification, or surveillance audits to the SFI Standard.</p>	
Rationale for proposed change:	Proposed New Language:

Use this space to propose any additions to Section 1:

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 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.

Rationale for proposed change:	Proposed New Language:

Use this space to propose any additions to Section 2:

3. Terms and Definitions

Definitions of terms can be found in the 2010–2014 edition of the Sustainable Forestry Initiative Standard.

Rationale for proposed change:	Proposed New Language:

Use this space to propose any additions to Section 3:

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 any 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 an audit any prior land appraisal or assessment work or land brokerage activity they or their employers conducted related to the property to be audited.

Certification bodies must successfully complete annual witness audits to maintain accreditation status from ANAB or SCC.

Rationale for proposed change:

The disclosure requirements focus on land appraisal or assessment work.

Proposed New Language:

Add: "or other professional forestry services" before "they or their employers

Other conflicts are not specified.

conducted ...".

Use this space to propose any additions to Section 4:

5. SFI Audit Activities

5.1. Initiating the SFI Audit

5.1.1. 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 to the certification body, which is responsible for ensuring that revised indicators are consistent with the spirit and intent of the SFI Standard performance measures and indicators, and that changes are appropriate for the specific local conditions and circumstances and the Program Participant's scope of operation and consistent with the principles of sustainable forestry.

Additional indicators beyond those identified in the SFI Standard, if included by the Program Participant, shall be audited like all other indicators.

5.2. Determination of Conformance

The certification body shall assess conformance to each element of the SFI Standard's, objectives performance measures and indicators within the scope of the audit. SFI Standard elements are objectives, performance measures, and indicators.

Evidence shall be compiled by examination of operating procedures, study of materials relating to forestry practices, and on-the-ground examination of 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 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 is in conformance with SFI principles, policies, objectives, performance measures, and indicators, and any additional indicators that the Program Participant chooses; and
- verify whether the Program Participant has effectively implemented its SFI Standard program requirements on the ground

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.

5.3. 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. 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 7, below, regarding the development and release of public reports.

5.4. Recertification

To maintain a current SFI certificate, Program Participants shall recertify their SFI Programs. Recertification to the SFI Standard is required every three years.

Rationale for proposed change:	Proposed New Language:
Just a comment: Have you considered the cost implications	
Enhance credibility of the Standard	In the briefing notes released with the draft standard, #22 "Audit Procedures and Qualifications" it is mentioned that annual surveillance audits are clarified to be 12 months. However, all language regarding surveillance audits seems to have been removed. There needs to be language making it clear that companies may still be on a continuous certification cycle over the three year period.
Concern that as an organization we are "audited to death". There is a backlash. Why do we need to send precious money increasing audit frequency once the program is up and running and has a proven track record? Periodic rather than annual should be the standard.	Recommend return to the previous wording. SFI should aggressively communicate with ISO to recind or modify the ISO 17021 auditing requirements.
This is a major concern for the XXXXX. Recertification every 3 years adds significant expense and additional effort toward maintaining certification. It is not in alignment with other programs such as FSC. XXXXX strongly recommends maintaining a 5 yr cycle.	"To maintain a current SFI certificate, Program Participants shall recertify their SFI Programs. Recertification to the SFI Standard is required every five years."
Inclusion of deleted language to provide clarity as to intent of survalliance audits, and to affirm that a three year cycle of survalliance audits can complete the recertification process, provided certain criteria are met	
5.4 - Recertification every three years will impose more unnessary audit costs on companies that are already stretched to the max.	Recertification should remain every five years. There is little to no risk here.

<p>5.4 recertification time period. Was this period not 5 yrs at one point? What is the justification of reducing to 3 yrs? Are we heading towards an annual recertification--with more cost and time?</p>	
<p>It is our strong preference to keep the re-certification cycle at 5 years. The SIC believes that a 3 year re-certification process is unnecessary, especially since annual surveillance audits will be performed every 12 months.</p> <p>Audits are expensive. By changing the re-certification cycle to 3 years, this will place additional financial costs onto SFI Program Participants, creating a disincentive to additional membership. Given the current economic climate, and taking into account the possible financial burdens a Program Participant may need to incur with updating their operation to be in compliance with the 2010 SFI standard, the SIC believes that mandating additional auditing costs is not reasonable.</p> <p>Also, a 3 year recertification process does not logically align with the 5 year standard revision process. The shorter (3 year) cycle is inconsistent with the long-term nature of the forest industry, particularly as applied to forest land management.</p> <p>The certification cycle has been a 5 years since SFI inception. PEFC endorsed the SFI Standard in 2005 with this 5 year certification cycle. The SIC doesn't see the need change this in order to simply be consistent with other PEFC or other accreditation body standards.</p> <p>Regarding the elimination of the continuous certification option – The XXXXX feels this has been a useful tool in the past and has logic relative to a continuous improvement program. Annual surveillance audits have more impact at the individual program level when tied to a continuous certification</p>	<p>To maintain a current SFI certificate, Program Participants shall recertify their SFI Programs. Recertification to the SFI Standard is required every five years.</p>

<p>than if done solely to meet an annual requirement. We would highly encourage retention of the continuous certification option.</p>	
<p>Requiring recertification every 3 years will add considerable cost and administrative effort to the SFI forest certification process. This is a huge concern for XXXXX in Wisconsin. It would be in our best interest if SFI auditing remained aligned with FSC audits; on a 5-year cycle.</p>	<p>To maintain a current SFI certificate, Program Participants shall recertify their SFI Programs. Recertification to the SFI Standard is required every five years.</p>
<p>Under 5.4 above the proposed 3-year audit cycle will impose a giant cost burden on SFI participants, nearly doubling the cost of auditing. Participants will have difficulty justifying that additional expense. Under the current five-year cycle, six audits will be required in thirty years. Under the proposed 3-year cycle, ten audits will be required in the same period. Taking the Continuous certification away will have the same level of cost impact and resource drain on personnel. Adding the additional costs today will not be well accepted. I suspect several participants will be forced by such a cost increase to evaluate and negotiate with other certification schemes.</p>	<p>Leave the current 5-year audit cycle unchanged</p> <p>Restore the continuous certification provision</p>
<p>5.2 Clarify that the introduction is not included as part of the audit.</p> <p>5.4 Pursue ANAB exception to allow recertification every 5 years as certification is a significant expense.</p>	<p>5.2 . . . assess conformance to each element of the SFI Standard's objectives, performance measures and indicators, specifically excluding the introduction, within the scope of the audit.</p> <p>5.4 Recertification to the SFI Standard is required every five years.</p>
<p>I understand that 5.4 was modified to match up with PEFC but it is a costly change that I do not feel is justified. We utilized continuous certification and found it to be very workable and effective without being overly intrusive. There were still annual surveillance audits and the entire standard was covered.</p>	<p>Keep the current standard's language regarding 5.4.</p>
<p>XXXXX does not support this change from a 5-year certification cycle to a 3-year certification cycle. XXXXX's review and analysis of this change suggests that the annual surveillance audits will be more intensive and that in a 15-year period, the number of re-assessment certification audits would essentially double. Such a change would cause the SFI auditing cycle to be incompatible</p>	

<p>with the FSC certification cycle (5-year period). For large dual-certified land management agencies, such as XXXXX, this change will result in additional auditing, process and operational costs, while also requiring additional staff and resources. Furthermore, it is unclear to XXXXX exactly how this change will result in a higher level of compliance with the performance measures / indicators or a improvements in responsible / sustainable forest management. XXXXX was encouraged to hear that SFI has asked for an exemption from this requirement. XXXXX believes that should this change be enforced, SFI may run the risk of losing current certificate holders, especially in this time of tight budgets and declining markets. XXXXX hopes that SFI continues to fight this change / requirement and that SFI considers the impact this change will have on current certificate holders. XXXXX would appreciate being kept up-to-date with the status of SFI's appeal of this change and any other additional information that SFI can provide.</p>	
<p>preference to maintain the recertification process of 5 years. Concern was expressed over the additional cost burden of moving from a 5 to a 3 year recertification process. See discussion from Minneapolis workshop for more detail.</p>	

<p>Use this space to propose any additions to Section 5:</p>
<p>5. SFI Audit Activities - XXXXX strongly recommends the language struck from the 2005-2009 Standard be included in the 2010-2014 Standard as follows: "Surveillance audits may be used to complete the recertification if, over the three year period, conformance with each relevant SFI Standard objective, performance measure, and indicator is fully assessed as appropriate to the scope and scale of the certificate at least once during the three year period."</p>
<p>I liked the deletion of the prior notification to SFI Inc. requirement</p>

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 audit. Additionally, at least one member of the audit team shall have knowledge of forestry operations in the region undergoing the audit, at least one member shall have knowledge of applicable laws and regulations, and at least one member shall be a professional forester as defined by the Society of American Foresters (SAF), the Canadian Institute of Forestry, or licensed or registered by the state(s) or province (s) in which the certification is conducted. For forest management audits, the audit team shall have expertise that includes plant and wildlife ecology, silviculture, forest modeling, forest operations, and hydrology. One specialist per discipline is not required to meet any of the above requirements.

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 2005-2009 SFI 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, etc.;
- b. international and domestic sustainable forestry management systems and performance standards; and
- c. certification requirements related to the SFI.

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 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.

Rationale for proposed change:	Proposed New Language:
incorrect reference	2010-20104 SFI Standard
<p>There is no expertise required on social issues. Auditors have no knowledge and thus can enforce the standards</p>	<p>6.1...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.</p> <p>In addition, for certifications to the 2005-2009 SFI Standard, audit team members shall have the education, formal training, and experience that promotes competency in and comprehension of</p> <ul style="list-style-type: none"> a. forestry operations as they relate to natural resource management, including wildlife, fisheries, recreation, etc.; b. international and domestic sustainable forestry management systems and performance standards, including occupational safety and health, and labor standards, native (first nations) cultures; and c. certification requirements related to the SFI.

<p>need to add “knowledge of the socio-demographics and cultural issues in the region”</p>	<p>Change to: “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.”</p>
<p>Under 7.2 of the APQ, it mentions wildlife ecology. It is unclear why it would not be appropriate to include ecology under 7.3.a, as well. A summary of the findings as currently worded does not include evidence of conformance. This is the meat of an audit report, and provides the transparency for credible certification systems.</p>	<p>Add ecological expertise to audit team, additional requirements for audit report including conformities and nonconformities.</p>

Use this space to propose any additions to Section 6:

7. Public Communication and Claims

7.1. Preparing and Submitting a Public Report

A Certified Program Participant shall provide a report (one copy must be in English) to SFI Inc. after the successful completion of certification, recertification, or surveillance audit to the 2005-2009 SFI Standard. The public report will be posted on the SFI Inc. website and available for public review.

The certification body shall prepare the public 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 forestland and manufacturing operations included in the audit;
- e. the name of the certification body and lead auditor (names of the audit team members, including technical experts may be included at the discretion of the audit team and Program Participant);
- f. the dates the certification was conducted and completed;
- g. a summary of the findings, including general descriptions of any nonconformities and corrective action plans to address them, opportunities for improvement, and exceptional practices; and
- h. the certification decision.

Rationale for proposed change:	Proposed New Language:
incorrect reference	2010-2014 SFI Standard
Should the 2010-2014 SFI Standard not be referenced instead of the 2005-2009?	

Use this space to propose any additions to Section 7:

8. Interpretations, Public Inquiries, and Official Complaints

8.1. Interpretations

From time to time, a formal process may be needed to interpret the SFI Standard and its supporting documents. As part of SFI Inc.'s commitment to continual improvement of both the SFI certification process and the SFI Standard, such concerns shall be submitted promptly to the SFI Inc. Interpretations Committee at the SFI Inc. website. The SFI Inc. Interpretations Committee shall respond within 45 days of receipt.

It is neither the intent nor the responsibility of the SFI Inc. Interpretations Committee to resolve disputes arising through certification; nevertheless, the committee will provide opinions and direction to assist parties in answering interpretive questions. Through this process, the SFI Program shall maintain a record of opinions and concerns available to both Program Participants and certification bodies to assist with certification planning. SFI Inc. shall periodically review this record and, where appropriate, recommend changes for inclusion in the SFI Standard or SFI APQ.

8.2. Public Inquiries Regarding Inconsistent Practices

Any party with information or claims about a Program Participant's individual practices that may be in nonconformity may seek to have those claims investigated.

The complainant shall present specific claims of nonconformity in writing and in sufficient detail to the Program Participant. Within 45 days of receipt of the complaint, the Program Participant shall respond to the complainant and forward a copy of the complaint and its response to the Program Participant's certification body for future review via surveillance or certification audits. The certification body shall investigate the validity of the complaint and the Program Participant's response and resolution of the claim at the time of the next scheduled surveillance audit.

A complainant who believes the issue has not been satisfactorily resolved may provide its original documentation and the response from the Program Participant to the appropriate SFI Implementation Committee Inconsistent Practices Program, which shall investigate and respond to the allegations within 45 days of receipt of documentation. If no appropriate SFI Implementation Committee Inconsistent Practices Program exists, the complainant may address the issue to the SFI National Inconsistent Practices office via the External Review Panel Secretariat. The SFI Implementation Committee or National Inconsistent Practices Program shall provide copies of its findings and any recommended actions to both the Program Participant and the complainant.

In the event litigation is involved between the external party and program participant, the inconsistent practices process shall be suspended pending resolution of the litigation. It shall be re-started following resolution of the litigation if SFI nonconformity issues remain.

8.3 Official Complaints Questioning the Validity of a Certification

The complaint process is an important component of any legitimate certification program, including the SFI. The complaint process enables individuals or organizations to have their complaint openly investigated. It is a credit to the transparency requirements of the SFI Standard that individuals and organizations can bring forward their concerns under a complaint process. A complaint does not challenge the credibility or the content of the SFI Standard, but rather it challenges the audit findings and the decision to grant the certification, or events that have happened since the last audit, that questions the maintenance of the certification.

8.3.1 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:

ANAB - ANSI-ASQ National Accreditation Board as being competent to conduct certifications to the 2005-2009 SFI Standard.

ANSI - American National Standards Institute as being competent to conduct certifications to the SFI Chain of Custody Standard.

SCC – Standards Council of Canada as being competent to conduct certifications to the 2005-2009 SFI Standard and the SFI Chain of Custody Standard.

8.3.2 Complaint Process

The complainant outlines their concerns in a letter to the certification body responsible for the audit.

The certification body may request additional specifics associated with the concerns and will investigate the issue in accordance with their procedures that were approved by their accreditation body.

If the certification body finds a sound basis for the complaint then it would require the Company to take correction and corrective action to address the complaint and advise the complainant accordingly.

If the certification body did not find a sound basis for the complaint and felt the certification was appropriately granted and performance has not changed since the certification, it would inform the complainant of this.

If the findings of the certification body do not satisfy the complainant then they can move to the higher authority which is the body that accredited the certification body, which is either the ANSI-ASQ National Accreditation Board (ANAB) (www.anab.org) or the Standards Council of Canada (SCC) (www.scc.ca). The accreditation body would then conduct its own investigation into the complaint as the highest authority.

In the event litigation is involved between the external party and program participant, the complaint process shall be suspended pending resolution of the litigation. It shall be re-started following resolution of the litigation if SFI nonconformity issues remain.

Rationale for proposed change:	Proposed New Language:
incorrect reference	2010-2014 SFI Standard

Use this space to propose any additions to Section 8: