



**SFI Standard Review Workshop  
Montreal, Quebec, Canada  
April 16, 2009**

**Welcome and Introductions**

Rick Cantrell, SFI Inc., provided background information on the standards review process and the proposed changes. Jody Erikson, The Keystone Center, provided facilitation and asked participants to provide their concerns and their proposals to address those concerns. The following summary records the key questions and concerns and proposals raised during the workshop.

**Organization and Principles of Revised Draft Standard**

1. **Question:** What Canadian environmental groups are involved in SFI? There should be more Canadian environmental groups. **Answer:** SFI has been working with several Canadian environmental organizations to secure interest in serving on the SFI Inc. Board of Directors. There are 6 US environmental organizations on the SFI Inc. Board: The Trust for Public Lands, Wildlife Management Institute, Ruffed Grouse Society, Theodore Roosevelt Conservation Partnership, The Conservation Fund, and Resources for the Future.
2. Terms – program, process and plan: **Concern:** These terms seem to be used sometimes interchangeable, some times discretely (e.g. performance measure 13 and indicator 13.1.1). **Proposal:** Establish the right terms and be consistent throughout the standard.
3. **Concern:** Some stakeholders believe the SFI does not adequately address aboriginal/indigenous people. This emphasis is necessary to make SFI certification more competitive in Canada as the perception by some is that SFI does not go far enough. Governments are the right entity to deal with indigenous issues, not sure it is a certification organization's role to work them. **Proposal:** Add additional emphasis, review CSA new standard language for aboriginal/indigenous people and work done by the Global Forest Alliance elements OR include additional context in the Preface.
4. **Concern:** There appears to be a lack of measures concerning plantation establishment particularly for converting to another species. Also, where is conversion to non forest uses covered? **Response:** 2.1.5 requires program participants to consider the ecological impacts of converting from one species to a different one. Conversion to non forest uses is covered in the SFI on-product labeling requirements. **Proposal:** Clarify in 2.1.5.

**Changes to Forest Management Objectives & Associated Definitions (Objectives 1-7)**

1. Performance Measure 1.1/Definition – long term: **Concern:** This could be different for different species. Is that the intent? **Response:** Yes, it could be 50-100 years depending on the species and operation.
2. Performance Measure 1.1 – forest management plans: **Concern:** This implies a written/printed document will be required in all cases; the expectation by auditors will be a written document. **Proposal:** Define "forest management plans" and clarify the intent that the plans can be computer based (electronic) and/or written/printed documents.

3. Indicator 1.1.1g – sustainable harvest level for bioenergy: **Concern:** There is a lot of controversy over what is a sustainable level of harvest for bioenergy. In Canada bioenergy feedstock harvesting deals with residue, so this term is confusing. **Response:** The intent is that it is the same as conventional harvest and was added to give additional emphasis that it is covered in this indicator and is not about “sustainable residue harvesting”. **Proposal:** Clarify this is not for residue management.
4. Indicator 1.1.1h – nontimber issues: **Concern:** It is not clear if this indicator covers Canada’s definition of nontimber issues (e.g. tourism). **Response:** Yes, the term covers the Canadian definition. The e.g. is only an initial list of potential items and is not intended to be all encompassing.
5. Objective 2 – carbon management: **Concern:** This is hard to work with. Is a participant covered if they have carbon management policies/agreements with the government? **Response:** This is not intended to add significant new requirements for program participants; rather it is acknowledgement that these provisions for reforestation are “carbon management” tools. **Proposal:** Define carbon management.
6. Indicator 2.1.1 – forest management units: **Concern:** In some parts of Canada the term “management unit” is used to define the entire organizations’ operating region. **Proposal:** Use “harvested areas” instead of “management unit” OR define it.
7. Indicator 2.1.3 – exotic trees: **Concern:** It is not clear whether this is about invasive exotic species or about managing exotic species. **Response:** The intent is to minimize planting trees outside their natural range to protect biodiversity. Invasive exotics are addressed in objective 4.
8. Performance measure 2.2: **Concern:** It is a critique of SFI that some herbicides are not banned from use. **Response:** The SFI program allows the use of herbicides that have been approved for such uses by state and federal regulatory agencies.
9. Indicator 2.4.4 – climate models: **Concern:** There are conflicting regional models and may vary significantly within a region. This will be hard to audit. **Proposal:** Remove until there is further consensus on climate change modeling.
10. Objective 4, Performance measure 4.1 and Indicator 4.1.1 – stand and landscape levels: **Concern:** It is redundant to say it three times. **Proposal:** Leave it at the objective and performance measure level; remove from indicator. The performance measure says “shall” which implies it must be done.
11. Indicator 4.1.1 – native biological diversity: **Concern:** The term is confusing. What is native and how is it determined? Does it mean pre-industrial? **Proposal:** Remove “native”.
12. Indicator 4.1.3: **Concern:** This is wordy. **Proposal:** End second sentence at collaboratively; remove “and may include....strategies”.
13. Objective 5 – harvesting and other operations: **Concern:** Don’t need both terms; “operations” is broad enough to encompass harvesting. **Proposal:** Use only “forest operations”.

14. Indicator 5.2.1 – 120 acres (48.6 hectares): **Concern:** Doesn't include management for natural disturbance which requires larger areas to simulate natural fire. There doesn't seem to be a scientific basis for the size limitations. **Proposal:** Remove the size restriction OR use language that allows larger sizes when adhering to regulations when the intent is ecological benefits OR address the differences by distinguishing between large public lands and private lands.
15. Indicator 5.3.3: **Concern:** Size and age criteria are not consistent across all forest and tree types and regions of operations. **Proposal:** Use "to address operational, environmental and economic considerations" instead of size and age criteria.
16. Performance measure 5.4 – shall: **Concern:** In Canada, it will be difficult to audit who is suppose to be providing the opportunities for recreation. On Crown land in Canada, participants do not control access by the public. **Proposal:** Separate requirements for private and public lands - clarify that "shall" applies to private land owners, and those with public lands will work with appropriate agencies to promote recreation.
17. Indicator 7.1.1a – residue management: **Concern:** It is unclear whether this is the same as biomass and the term social is abstract. **Proposal:** Use "residue management and consider various utilization options".

#### **Changes to Fiber Sourcing Objectives & Associated Definitions (Objectives 8-13)**

1. Performance measure 8.1: **Concern:** It is hard to understand the intent. **Proposal:** Use "program participants shall provide information to landowners for: a) reforestations; b) use of BMPs; and c) identification and protection of important habitat elements for wildlife including forests with exceptional value".
2. Indicator 8.1.1e: **Concern:** Residue is not defined and social is vague. **Proposal:** Define "residue", use "management of residue of various utilization options" and remove "social".
3. Indicator 8.1.1g – potential: **Concern:** The phrase "potential for special sites" is not definitive and will be hard to audit. **Proposal:** Remove "potential for".
4. Indicator 8.1.2 – American Tree Farm System: **Concern:** This doesn't apply to Canada. **Response:** "Such as" is used so that if there are similar systems they can be used. **Proposal:** Add language for similar Canadian systems (e.g. CSA Z804)
5. Performance measures 9.1 and 16.2 – qualified logging professionals: **Concern:** This has been difficult in Canada because there are no or few third party training organizations like the US has with many logging and forestry associations at the state and regional level. This means large organizations do training internally. This raises challenges for small participants without training opportunities. It may be awkward for a single program participant to do training programs and include items like "business management" which is required. **Proposal:** --. Better coordination by the SICS and perhaps encouraging larger organizations to open their training programs to all logging professionals.
6. Indicator 9.1.2 – list of: **Concern:** This is hard to do in Canada. Some provinces are very large and would be very hard to build and maintain a province-wide list. And all the SICs in Canada are not set up in a manner to efficiently manage lists. **Proposal:** Use "keep working to ..."

7. Objective 10 – BMPs: **Concern:** BMPs in SFI refers only to water quality, but there are BMPs for various other things. It is misleading to say “broaden the practice of sustainable forestry” because this goes well beyond water quality. **Proposal:** -- Modify language to clarify the intent is just for water quality.
8. Performance measure 10.1 – policies: **Concern:** Seems like this is supposed to be “programs”, not policies. **Proposal:** Use “programs” instead of “policies”.
9. Indicator 10.1.1: **Concern:** This implies 100% qualified professionals. This would be really hard to achieve. **Proposal:** Use “promote” OR clarify intent is a program to try to reach 100% AND/OR use intent boxes.
10. Indicator 10.1.2 – harvest: **Concern:** The term harvest is too narrow. **Proposal:** Use “operations” instead of “harvest”.
11. Indicator 10.1.3: **Concern:** May be hard to audit and may lead to requests for proof of compliance (from downstream suppliers) with that contract element. **Proposal:** --.
12. Indicator 10.1.3 – raw materials: **Concern:** This term is not clear. **Proposal:** Define raw materials.
13. Indicators 11.1.2 & 3 – direct suppliers: **Concern:** Is in italics but is not defined. **Response:** It is in the current standard and should not have been deleted. **Proposal:** Put the definition in the current standard back in.
14. Objectives 12 & 13: **Concern:** These both deal with controversial sources. **Proposal:** Combine into one objective on illegal logging outside the US and Canada.
15. Objectives 12 & 13: **Concern:** Why do these not apply for illegal logging that occurs in the US and Canada. **Response:** From a risk assessment standpoint, the risk of illegal logging in the US and Canada is comparatively small compared to some other countries around the world. The SFI Standard relies on the laws and regulations, and enforcement of those laws and regulations by government authorities, to address illegal logging in North America, focusing greater efforts in other countries without effective laws and or enforcement of those laws. **Proposal:** Include US and Canada.
16. Objectives 12 & 13 – avoidance: **Concern:** Is the term “avoidance” strong enough? **Response:** Avoidance is the correct term along with having established programs to identify areas of significant risk and to address problems if they are discovered.
17. Indicator 13.1.2 – reference to 8.6.1: **Concern:** Typo. **Proposal:** Fix it.

### **Changes to Forest Management and Fiber Sourcing Objectives & Associated Definitions (Objectives 14-20)**

1. Indicator 14.1.4: **Concern:** This is duplicative because participants have to comply with all laws and regulations; doesn’t add value. **Proposal:** Remove.

2. Performance measure 14.1 – social: **Concern:** This term is vague. **Proposal:** Remove “forestry and related social and environmental”.
3. Performance measure 17.1 – shall support and promote...American Tree Farm System (ATFS): **Concern:** This isn’t possible in Canada. **Proposal:** Add “such as” before ATFS.
4. Indicator 17.1.3: **Concern:** Doesn’t include Canadian term “species at risk”. **Proposal:** Add “species at risk”.
5. Objective 20: **Concern:** Too loose, not strong enough. **Proposal:** Add “shall” and some specifics/tangibles to ensure effective systems are in place and supported by and used by management.
6. Performance measure 20.1 – management review system: **Concern:** It is unclear what this means or at what level. **Proposal:** Add specifics.

#### **Changes to the Audit Procedures and Auditor Qualifications Changes**

1. 3 year re-certification cycle: **Concern:** Canada has 5 year plan requirements for relicensing. CSA Z809 requirements are exempt from the 3 year cycle as the case was made that SFI is not a management system it is a performance based system and so 5 years is acceptable. **Proposal:** Check the Australian and Chilean forestry standards and IAF’s position.

#### **Next Steps**

- Summary of each workshop will be posted
- Public comment period ended on March 2, 2009
- Completion of the 7 workshops (final workshop on April 16)
- Review of the comments and workshop summaries
- Final Standard released at the SFI Annual Conference in September 2009
- Program participants are encouraged to discuss changes in the Audit Procedures and Qualifications with their respective certification bodies and provide additional feedback to SFI Inc. staff on the impacts of these changes on their operations