



**SFI Standard Review Workshop Summary
Sustainable Forestry Initiative Inc. and the Keystone Center
Vancouver, British Columbia, Canada
February 19, 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.

Standard Review Process

1. **Question:** How are the members of the Review and Writing Committee chosen? **Response:** the committee members are chosen from the Resources Committee members and their designees. Initially Resource Committee members volunteered then, if there were gaps in representation, people were nominated by Resources Committee members.
2. **Question:** How will SFI meet their deadlines and address the International Labor Organization (ILO) Conventions issue? **Response:** SFI Inc.'s plan is to have the ILO issue resolved by May 30th, 2009 to include in the draft that will be sent to the SFI Inc. Board at that time. It is likely there will be another comment period announced to specifically review changes that are proposed to resolve the ILO issue.

Organization and Principles of Revised Draft Standard

1. Preface: **Concern:** The preface is silent on what procurement certification is all about; who. **Proposal:** Clarify that procurement certification could include non land owners; can become procurement certified without certifying to the other objectives.
2. Preface: **Concern:** References to Best Management Practices (BMPs) could be for anything. **Proposal:** Clarify BMPs are in reference to water quality.
3. Indicators - increase in numbers: **Concern:** Increase in indicators increase administrative costs. **Proposal:** In the next standards review, analyze indicators and remove those that are not as effective.
4. Broad language: **Concern:** Broad Language is better for large organizations and more difficult for small ones. **Proposal: -- none**

Presentation and Discussion: Changes to Forest Management Objectives & Associated Definitions (Objectives 1-7)

1. Climate change and carbon management references: **Concern:** The science is changing and we may not know enough now. The standards may create requirement that can't be planned for or unable to fulfill and not rooted in sound sustainable forestry science. **Proposal:** Add more detail in the performance measures and indicators noting "where applicable."
2. Indicator 1.1.1g - conventional harvest: **Concern:** 'Conventional harvesting' is vague. For example, is cable logging considered conventional logging? **Proposal:** Add a definition of conventional harvesting.
3. Indicator 1.1.g – bioenergy feedstock: **Concern:** How does one track "bioenergy feedstock"; unsure how the harvesting would be tracked in British Columbia. **Proposal:** --
4. Objective 2 – carbon management: **Concern:** "Carbon management" is vague; how will it be audited. **Proposal:** Clarify what carbon management actually is, and/or a definition to support the term.
5. Performance measure 2.1: **Concern:** The wording is very prescriptive and not long enough for hardwood. Seems out of sync with "BC reforestation standard". **Proposal:** Clarify the intent (prompt reforestation) OR remove it and extend timeline to 7 years.
6. Indicator 2.1.5 – program: **Concern:** The term "program" – what about those that don't produce their own trees? What is the interpretation and are the regional aspects (i.e. species makeup and competition)? **Proposal:** Add "as applicable" OR change the term program to information gathering OR reference Canada's system.
7. Comment: add qualifying language noting reforestation requirements may be different from those stated in order to meet "legal compliance" in some locales (e.g. British Columbia).
8. Indicator 2.4.4 – climate model: **Concern:** This is vague and doesn't account for targets set by British Columbia. **Proposal:** Clarify climate models.
9. Indicator 2.5.1: **Concern:** This puts program participants in uncomfortable position in asking for information from their producers. How will it be audited? **Proposal:** Add "as appropriate" OR clarify how the program would be developed for a company without direct relations on this issue.
10. Indicator 3.1.2 – BMPs: **Concern:** BMPs is not a term commonly use BC **Proposal:** Define the term OR add "where laws exist."
11. Indicator 3.2.4 – vernal pools of ecological significance: **Concern:** The terms are vague leaving a lot of room for interpretation. Assessing "significance" will require a different expertise. This will increase costs if have to hire an expert. **Proposal:** Define "vernal pools" and "ecological significance" OR add "use local definitions where they exist" OR include all five Canadian classifications or lump all together. **Response:** Wording was intended to allow flexibility for regional definitions of ecologically significant.

12. Indicator 4.2.1 – forests with exceptional conservation value: **Concern:** The term is vague, is “conversation value” about forests or species? Does this remove references to G1 and G2 classifications? Forests with exceptional conservation value and G1 and G2 are different things. **Proposal:** Clarify the term “forests with exceptional conservation values” and how it relates to G1 and G2.
13. Indicator 4.2.3 – information collection: **Concern:** This is vague and will be hard to audit. It is hard to find good information. **Proposal:** Clarify how this will be measured.
14. Indicator 4.2.3: **Concern:** Climate change isn’t the only thing that affects wildlife habitat. **Proposal:** Add language to clarify there are other impacts on wildlife habitat.
15. Performance measure 5.2 – shall provide recreation: **Concern:** “Shall” is strong language, what about non-land owners or manufacturers or private land owners. **Proposal:** Replace with “access and recreation should be up to the landowner” OR use old language OR define the term recreation OR add “if there are no issues of risk to the asset, environment or safety” OR add “consistent with management plan and no land or resource degradation.” **Response:** Only landowners have to meet this performance measure since it is in Objective 5
16. **Concern:** 5.2.1. – Applaud the broadness and flexibility for changes to meet legal requirements. Recognition of jurisdictional concepts should be added. **Proposal:** add language around “jurisdictional requirements”.
17. Indicator 5.3.3 – feet: **Concern:** This is not reflective of Canadian system of measurement. **Proposal:** Add equivalent in meters.
18. Indicator 6.1.1. – natural heritage data: **Concern:** “Natural heritage data” system doesn’t exist in all of Canada. British Columbia has conservation data center. **Proposal:** Add “or equivalent.”

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

1. Performance Measure 8.1 - BMPs: **Concern:** BMPs don’t always exist and sometime BMPs are covered by regulations. **Proposal:** Add “or regulation, where it exists.”
2. Indicator 8.1.1f - invasive exotic: **Concern:** “Invasive exotic” terminology doesn’t fully apply to British Columbia. The two terms can be defined differently, as some exotics are not technically invasive and vice versa. **Proposal:** Add “where applicable” and clarify.
3. Performance Measure 8.2 – American Tree Farm System: **Concern:** The term is too US focused; it includes “US only” aspects. **Proposal:** Remove OR add a Canadian equivalent as a suggestion.
4. Objective 9: **Concern:** How do you address the small landowner/other wood supplier (e.g. clearing for agricultural use)? **Proposal:** --
5. Performance measure 9.2 – certified logging professional: **Concern:** What certification program would be addressed in Canada? **Proposal:** Remove “of a certified logger certification program” OR add a “where applicable”

6. Performance measure 9.2 – certified and qualified logging professional: **Concern:** The difference between “certified” and “qualified” is not clear and is considered the same by some participants. **Proposal:** Add “and/or qualified logging professionals”; and clarify the difference.
7. Indicator 10.1.1 – suppliers: **Concern:** A supplier isn’t always the logger, but sometimes the program participant. **Proposal:** Remove “supplier” OR decrease the direct ties to manufacturing facilities.
8. Indicator 10.1.3 – BMPs in contracts: **Concern:** Intent is to limit the audit at the contract level; However 10.1.3 takes the next step by requiring BMPs in all contracts. This will be hard to enforce. **Proposal:** --
9. Definition - Procurement: **Concern:** “Procurement” suggests you are only purchasing logs for a manufacturing facility. What about log brokers? **Proposal:** Remove direct ties to manufacturing facility.

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

1. Indicator 14.1.4 – respect: **Concern:** “Respect” is a vague term. The statement decreases credibility of the standard. If the government identifies a protected area, and the participant doesn’t comply with the law, the participant will suffer the consequences. **Proposal:** Remove the language OR clarify the term respect.
2. Indicator 14.1.4 – government process: **Concern:** “Government processes” is too broad it could leave auditing open to outcomes from internal government processes (e.g. species wish lists). **Proposal:** Remove OR define government processes to exclude informal/internal processes.
3. Indicator 14.1.2 – system: **Concern:** Use of term “system” instead of program is inconsistent with the rest of the document. **Proposal:** Use the term program instead of system.
4. Indicator 14.2 – policy: **Concern:** Policies are covered under the principles section for all other issues; it is inconsistent to use it here. **Proposal:** Change the word “policy” to more appropriate term OR move to the principles section.
5. Performance measure 15.2.1. – cooperative efforts with SIC and/or associations: **Concern:** What if there is neither an SIC or an association in the state or province? (e.g. does Manitoba have an SIC)? **Proposal:** Needs to be more flexible.
6. Indicator 15.2.1 a & b: **Concern:** It is difficult to find recent data and information and many states do not collect the information any longer. **Proposal:** Add “some of the following” (many states use US Forest Service Forest Inventory and Analysis data).
7. Indicator 16.2.1c – invasive exotic: **Concern:** “Invasive exotic” plants and animals terminology doesn’t fully apply to British Columbia. The two terms can be defined different, as some exotics are not technically invasive and vice versa. **Proposal:** Add “where applicable” and clarify OR split them out.
8. Indicator 16.2.1d – habitat protection: **Concern:** It is unclear whether this is species specific. **Proposal:** Add “where applicable” OR add “wildlife habitat protection”.

9. Indicator 16.2.j – carbon offsets: **Concern:** carbon management and bioenergy feedstocks awareness training not necessary in all locations. **Proposal:** Add “where applicable”.
10. Indicator 17.1.1: **Concern:** Development of education materials for “landowner organizations” seems unnecessary. Participants internally interpreted this to mean for family forest landowner. **Proposal:** Add “small forest landowner” OR clarify this is for non-landowners.
11. Performance measure 19.1: **Concern:** This will be difficult to audit because the report is written by the auditor not the participant. **Response:** The participant ensures the report is provided to SFI, Inc. and includes all the listed items.

Changes to the Audit Procedures and Auditor Qualifications Changes

1. Recertification: **Concern:** A three year cycle will be more costly, more administration and hardest on small companies. **Proposal:** Add a clause that if the participant has been in good standing for a number of years they can continue with the five year cycle.
2. Annual surveillance audit: **Concern:** There is not enough flexibility for small organizations or for times when operations are down; it would be cost prohibitive if all operating units are required to be covered. **Proposal:** Maintain an 18 month cycle and directly reference the external document/interpretation used for allowing flexibility.
3. Transition to new standards: **Concern:** How will the transition occur – day-one compliance or phased? (e.g. does a participant need to recertify on day one or recertify three years after the new standards are published)? **Proposal:** Clarify how the transition will occur (e.g. a participant finished their five year cycle then is on a three year cycle). **Response:** SFI Inc. will prepare a transition plan for auditors and program participants, once the Standard is finalized. All new standard provisions have a one year implementation period.

Parking Lot

1. Auditors/Auditing

- a. **Concern:** Auditors will not be fully informed of the changes and the intent; therefore they may interpret the broad language in unintended ways that cause increase in costs and administration. **Proposal:** Provide an interpretation document and/or an auditors’ workshop to explain the changes and intent. **Response:** The changes will be communicated and explained at meetings, the SFI conference and the auditors meeting at the SFI conference.
- b. **Question:** What is the interpretations process and how are interpretations updated? **Response:** Interpretations process is to review issues and provide interpretation within 45 days. If there are significant interpretation issues, the Interpretation Committee makes a recommendation to be reviewed by the Resource Committee and the Board. All interpretations documents are dated and posted on the website.

- c. **Concern:** Auditors are not consistent from audit year to audit year (e.g. on year no comment, next year same indicator audit says not in compliance). **Proposal:** Provide a checklist of auditors to use and host an auditors' workshop and/or webinar to discuss changes and provide the intent of the revisions.

2. Public Consultation – Talking Points

- a. It would be good to have some talking points on how SFI program addresses community and public involvement. Would like to address the issue and provide for additional community involvement. SFI Inc. Comment: SFI Inc. is addressing this issue and currently developing a fact sheet on the issue. Fact sheet will be provided to all program participants when completed.

Next Steps

- Summary of each workshop will be posted
- Public comment period ends 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 encourage 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