



**SFI Standard Review workshop  
Minneapolis, MN  
March 3, 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. Preface: Page 8, second paragraph: **Concern:** Confusion between require or encourage in the preface (require) and objective 9 (encourage). **Proposal:** Be consistent.
2. Preface: Page 8, second paragraph: **Concern:** -. **Proposal:** Add in "qualified logging professionals and certified logging professionals".
3. Preface, Paragraph 1 – social: **Concern:** The term "social" is being used throughout in different ways and not always accurately (e.g. civic/civil benefits as opposed to a true "social" benefit). What is the definition of social? **Proposal:** Consider the best term and be consistent throughout.
4. **Concern:** many of the proposed changes seem to be politically motivated, as opposed to a science and research based change. **Proposal:** -.
5. Objectives' Titles: **Concern:** Titles are inconsistent, some use verbs some don't. **Proposal:** Make the "verb/action" more consistent in Objective titles.
6. Term - harvesting: **Concern:** "Harvesting" is not an accurate term because sometimes it goes beyond harvesting. **Proposal:** Use the term "forest operations" more often than "harvesting".
7. Terms - plan and program: **Concern:** "Program" and "plan" are being used interchangeably; program is often more appropriate. **Proposal:** Consider changing "plan" to "program" throughout the document.
8. Terms - procurement and fiber sourcing: **Concern:** These terms are being use interchangeably. **Proposal:** Pick one and use it throughout.
9. Terms - carbon and carbon management: **Concern:** Terms are unclear. **Proposal:** Add a definition of "carbon" or "carbon management."

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

1. Objective 1 Management plans: **Concern:** This will become a paper chase for auditors. **Proposal:** Clarify intent that the management plan can be on paper or in electronic form.
2. Indicator 1.1.1.g: **Concern:** This indicator is a leap with respect with bioenergy feedstock harvesting. **Proposal:** Leave 'g' as "Recommended sustainable harvest levels" and add an additional qualifier regarding bioenergy feedstock harvesting (e.g. "consideration for bioenergy feedstock supply and utilization" or "for purposes of impact on harvest levels").
3. Term - bioenergy feedstock: **Concern:** The term is not clear; it means different things to different people (e.g. in Minnesota it means wood for electricity). **Proposal:** Clarify "for any bio produced" OR use the word "biofeedstock."
4. Indicator 1.1.3: **Concern:** Seems duplicative to Objective 1.1.1.e. **Proposal:** Remove 1.1.3.
5. Performance Measure 2.1 – five year natural regeneration: **Concern:** The "five-year" requirement is inadequate for some forest types. **Proposal:** Add ", or appropriate length of time based on forest type and/or region" OR add "generally" before five years  
Clarify "Site specific environmental" to meet this.
6. Indicator 2.2.4 – integrated pest management: **Concern:** The definition is not consistent with the commonly used definition in Wisconsin and it is not consistent with the degree to which is used. **Proposal:** Define it as inclusive of chemical, biological control agents, mechanical, etc. AND/OR move up to Indicator 1.
7. Objective 3 – BMPs (Best Management Practices): **Concern:** It is confusing to know which BMPs – water quality, soils, etc. **Proposal:** Clarify what BMPs are used for in relation to the SFI Standard. **Response:** The BMP definition was updated to clarify use for water quality purposes only.
8. Indicator 3.2.4. – vernal pools of ecological significance: **Concern:** The terms are very broad and it is unclear who defines significance. **Proposal:** Define "ecological significance" OR use a different term (e.g. "indication and protection of vernal pools..."); use the word "program" to help with the definition; and clarify who can define "ecological significance" (e.g. program participant or stakeholders). **Response:** Intent is to give Program Participants flexibility to use the best available science to define the term that is relevant to their area or region.
9. Objective 4 – forest with exceptional conservation value: **Concern:** This term is unclear. It is not in alignment with other standards which could create unintended consequences. Does this include G1 & G2 species? **Proposal:** Consider a term that is more in line with other standards, add "special sites" and clarify the relation to G1 and G2 species.
10. Indicator 4.1.4 – pollinator habitat: **Concern:** The term is unclear. **Proposal:** Add "pollinator habitat" to the Glossary.
11. Indicator 4.1.3: **Concern:** Program and plan are being used interchangeably, and the term plan should be program. **Proposal:** Review the use of the terms.

12. Indicator 4.1.5: **Concern:** Many caveats in the wording, makes the indicator confusing to follow. **Proposal:** Reduce wording to be clearer.
13. Indicator 5.2.1 - clearcut size: **Concern:** Clearcuts are not only a visual quality issue, but addresses other resource management values (e.g. caribou habitat where larger clearcut sizes are used to emulate natural disturbance patterns). Minnesota has visual quality guidelines, making it hard to stay within the clearcut size average. **Proposal:** Remove size limit OR acknowledge it can be larger if part of a government adopted management plan.
14. Indicator 5.2.1: **Concern:** --. **Proposal:** Add the word "documented" before "forest health" and replace everything after "forest health" and replace with: ", biodiversity, or other ecological considerations." OR amend objective 4 to address this issue.
15. Objective 5.3 – green up: **Concern:** The term "green up" is defined differently by different auditors. **Proposal:** Remove "or alternative methods that provide for visual quality." and replace with "for defining the boundaries of clearcuts." Clarify "green up requirements" – possibly: "A rule for determining when adjacent clearcuts are to be considered a single clearcut for purposes of computing clearcut size."
16. Objectives 6 – program participant lands: **Concern:** This is the only place this is mentioned. **Proposal:** Add in all objectives OR remove from Objective 6.
17. Objective 7: **Concern:** --. **Proposal:** Add an indicator including language to capture mortality and timber management due to insect and disease.
18. Performance Measure 7.1: **Concern:** Too much focus on technology and not enough on result. **Proposal:** Add language to focus more on results, research and science and less on than technology.
19. Indicator 7.1.1f: **Concern:** --. **Proposal:** Add "process to salvage timber to capture mortality due to insect, disease or fire."

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

1. Performance Measure 8.1: **Concern:** Biodiversity is in the indicators, but not in the performance measure. **Proposal:** Add the word "biodiversity" to wildlife in the performance measure.
2. Objective 9 and Objective 16: **Concern:** --. **Proposal:** Combine these objectives.
3. Terms – certified and qualified logging professional: **Concern:** There is no clarity on the difference between qualified and certified logging professionals. Why isn't this being encouraged by all program participants, including forest landowners? **Proposal:** Clarify the difference between a wood producer, a qualified logging professional and a certified logging professional. Add language to encourage use of qualified and certified logging professionals by all program participants.
4. Performance Measure 9.1 – certified logging professional: **Concern:** This term is vague and doesn't define elements of an acceptable logger certification program. **Proposal:** Clarify what a certification program must cover. (Workshop participant submitting comments online)

5. Objective 10 – mill inventories: **Concern:** Seems unnecessary in this economic climate. **Proposal:** -.
6. Objective 10.1 - policy: **Concern:** The term policy should be program; a program is easier to generate in an organization than a policy. **Proposal:** Use “program” instead of “policy.”
7. Indicator 10.1.1: **Concern:** It is unclear whether it is require or promote. **Proposal:** Add language to show the intent is to move towards 100% OR add language “to show an increase in the % of qualified logging professionals. Change language in the preface (p.8) to reflect whether it is required or promoted. **Question:** Would “require” violate antitrust issues? **Response:** All new provisions and changes have been reviewed by antitrust counsel. Additional reviews will occur prior to final consideration by the Board.
8. Indicator 10.1.1: **Concern:** This would preclude use of fiber from tribes, small and family forest landowners or farmers. **Proposal:** Clarify the intent.
9. Indicator 11.1.1: **Concern:** This language is weak. **Proposal:** Use stronger language. (Workshop participant provided written comments on this issue in written comments submitted online)

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

1. Objective 14.1 & 2: **Concern:** These two performance measure seen very similar in nature. **Proposal:** Lump 14.1 and 14.2 together.
2. Indicator 14.1.4: **Concern:** It is unclear why this was added. Much of the work in Canada is done on government lands and the government has regulations that protect government identified lands. **Proposal:** Remove this indicator.
3. Objective 16: **Concern:** Objective 9 and 16 are linked. **Proposal:** Keep Objective 9 and 16 together OR move Objective 9 just ahead of to Objective 16.
4. Objective 18: **Concern:** First nations need to be acknowledged as nations and not just a stakeholder; there needs to be increased emphasis on tribal and first nation status. **Proposal:** Strengthen the language on first nations and indigenous people; add a dedicated objective or performance measure; add language to acknowledge their status; and add “limited to substantiated rights”. Suggest more enhancement and strength on the issue.

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

1. 3 year cycle: **Concern:** It will be costly for large organizations to conduct complete audits on everything every three years. Why is this change necessary? A three year cycle will burn out an already small number of auditors. **Response:** It is a new ISO requirement. A case might be made that things and plans do not change as rapidly in the forestry community—SFI Inc. is seeking an exemption or delay in implementing this change with the accreditation bodies (ANAB and SCC).

2. Implementation: **Concern:** Participants will have to conduct full audits immediately, even if they are still on a valid 5-year certification. What is the transition period/plan? **Response:** The committee will develop a transition plan. It is likely that participants would start the three years cycle when their current valid certification period ends.
3. Auditor interpretation: **Concern:** There is variation in auditors' interpretations and qualifications. **Proposal:** Strengthen the interpretation process and make it easier to access and provide an interpretations document.

### **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