



**SFI Standard Review workshop
Portland, MN
April 7, 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:** How optimistic is it that SFI standard meets LEED standard requirements?
Response: SFI is cautiously optimistic SFI will be recognized in some way. It depends on the final LEED standard and bench marks and the final revisions to the 2010-2014.
2. **Question:** What happens if the Resource Committee or SFI board adds a new piece to the standards or a major overhaul? **Response:** It is unlikely there would be a major overhaul because of the Board's involvement throughout the process. If a significant new section/element was added late in the process it would be distributed for public review. This could mean a delay in activating the revised standard or the standard might be activated and the new piece added later.
3. Principle 1 – ecosystem services: **Concern:** What does this mean? **Proposal:** Clarify.
4. Principle 3 – conform with BMPs: **Concern:** This is a methodology and it is covered in the objectives; not principle level language. **Proposal:** Remove the language.
5. Principle 5 - recreation: **Concern:** Does not need to be elevated; document doesn't support it. Recreation is viewed differently on public and private lands and different states have different requirements. **Proposal:** Remove it from the principle.
6. **Concern:** A company with land wants to be certified and decides to split out the land and not certify it but only certify the mills. The SFI web site does not stipulate what is included and what is excluded. **Proposal:** Find a place to clarify that if the issue exists. **Response:** This is not allowed unless the result is a totally independent company with its own board of directors or ownership is formed that owns the land. The certificates posted on the SFI Inc. website show the scope of the certifications.
7. Term climate change: **Concern:** This is not specific enough – in relation to what. **Proposal:** Clarify the specific about climate change (such as adaptation).

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

1. Performance Measure 1.1 and indicators – plans & planning: **Concern:** There is inconsistent use of the terms plan and planning – is it a thing or a process, and auditors will interpret this

differently. **Proposal:** Clarify OR use one term AND/OR define forest management plan and forest management planning.

2. Performance Measure 1.1/definition of long-term – forest management rotation: **Concern:** For some trees rotation is 100 years. It is difficult to project 100 years forward. **Proposal:** Use “reentry cycle” OR remove it.
3. Indicators 1.1.1h & 1.1.4 – climate change: **Concern:** There is considerable variation in data on this issue and it is unclear how these will improve forests. **Proposal:** Remove the reference to climate change.
4. Indicator 1.1.1g – conventional harvesting: **Concern:** This term could be interpreted in different ways (e.g. the method of harvesting) and could be different regionally. In the past, this term included bioenergy harvesting. **Proposal:** Clarify if/what the difference is between conventional and bioenergy feedstock harvesting OR add “for all products and where applicable bioenergy feedstock harvesting”.
5. Objective 2 – GE Trees: **Concern:** It is not clear that the assumption is that there will be no deployment of GE trees during the new standard cycle. **Proposal:** Clarify the assumption that GE trees are not being commercially deployed OR create a footnote to clarify the assumption.
6. Performance Measure 2.1 – natural regeneration within 5 years: **Concern:** This is too short for some regions and some trees to know if regeneration has occurred. This seems more geared toward plantation farming. Some of the indicators refer to chemicals which are banned in some states (e.g. Vermont). **Proposal:** --.
7. Indicator 2.4.4 – climate models: **Concern:** Seems like auditors will have to decide what is scientifically valid. This implies SFI believes in climate change and that there should be changes for climate change. **Proposal:** Remove the terms. **Response:** The intent is to recognize a variety of models exist, are being developed and participants will use that data to consider management changes.
8. Performance Measure 3.2 – harvesting system and utilization levels: **Concern:** It is unclear how “harvesting system and utilization levels” helps protect riparian areas. Will this come in conflict with state requirements? **Response:** The intent was to clarify bioenergy feedstock harvesting will still protect riparian areas. **Proposal:** Add “, notwithstanding OR emphasize protection of the zones.
9. Indicator 3.2.4 – vernal pools of ecological significance: **Concern:** External jurisdictions (like a town) could define what significance without a scientific basis and participants and auditors may interpret this indicator to mean they have to use that definition. If the definition included all regulations it would be hard to manage across all lands. Be careful in defining the term that it doesn’t become prescriptive. **Proposal:** Define it or clarify who defines it OR remove it OR define ecological significance as “based on scientific data”.
10. Objective 4 – forests with exceptional conservation value: **Concern:** This term seems more nebulous than the old language that referenced G1 and G2. If more than G1 and G2 is meant, than say so somewhere. **Proposal:** Use G1 and G2 language unless the intent is more than that and clarify it AND wherever “critically imperiled and imperiled” terms are used add “G1 and G2”.

11. Indicator 4.1.4 – pollinator habitat: **Concern:** The term is unclear. **Proposal:** Define it.
12. Indicator 4.2.1 – mapping, or participation in: **Concern:** The intent seems confusing – do an inventory, fund an inventory or both. **Proposal:** Move to the research objective OR delete “such as…” clause AND/OR add “have available” instead of “collection of”.
13. Indicator 4.2.3 – collection of information on climate change: **Concern:** Not sure how this to comply with this and it seems duplicative to 1.1.1h. **Proposal:** Remove it OR use “use data” instead of “collection of”.
14. Objective 5: **Concern:** The objective and performance measure language are not properly hierarchical – recreation (5.4) is not covered in objective description. **Proposal:** Incorporate recreation opportunities in the objective description.
15. Indicator 5.2.1 – clear cut size: **Concern:** At what point is clear cut no longer clear cut (when has it grown back). How does this allow for habitats that require larger areas? **Proposal:** Define it OR remove it OR provide exceptions for disturbance regimes or wildlife habitat.
16. Indicator 5.2.1 – 48.6 hectares: **Concern:** --. **Proposal:** Round up the number to 49 hectares.
17. Performance Measure 5.4 – recreation opportunities: **Concern:** This will be very difficult for private land owners, particularly if recreation can be a revenue generator. In Maine the legislature is trying to attach public access to tax credits. **Proposal:** Remove OR use “should” instead of “shall”.
18. Performance Measure 7.1 - appropriate: **Concern:** Application varies by region; “appropriate” can differ by state. **Proposal:** Add language to clarify regional significance.
19. Objective 7 – efficient use of: **Concern:** Utilization is market driven. **Proposal:** --.
20. Indicator 7.1.1b – training: **Concern:** This is the first time training is referenced and there are other areas earlier in the standards that could benefit from training. **Proposal:** Add to other areas.
21. Indicator 7.1.1d – underutilized species: **Concern:** What does this mean? What does it mean to over utilize? **Response:** The intent was to have participant do smart utilization; use waste if it can be used and strike a balance between utilization and environmental goals. **Proposal:** --.

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

1. Performance Measure 8.1 – shall provide: **Concern:** Information is onerous to develop or gather; it is challenging to find a way to get the information to everyone; and it overloads the landowner with information every year. “Shall provide” is easier language to audit. **Proposal:** Use “shall provide access to” instead of “provide”.
2. Indicator 8.1.2 – encourage: **Concern:** It is difficult to audit - how does a participant demonstrate encouragement. **Proposal:** Create a verification baseline for how to audit this

indicator OR use "provide information" instead of encourage OR remove it from the standards and make it a core mission of SIC.

3. Indicator 8.1.2 – American Tree farm: **Concern:** This seems like promoting another system besides SFI. If the intent is for family forest owners, then state that. **Proposal:** Add "encourage family forest owners" AND/OR add "such as SFI program and American Tree Farm.
4. Performance Measure 9.1 – encourage: **Concern:** It is difficult to audit; how does a participant demonstrate encouragement. **Proposal:** --.
5. Performance Measure 9.1 – certified and qualified logging professional: **Concern:** There is lack of clarity on the difference between qualified and certified logging professionals, and about the difference (or sameness) of qualified and trained loggers. **Proposal:** Clarify the difference/sameness between trained, qualified and certified logging professionals.
6. Performance Measure 9.1 – certified or qualified: **Concern:** It is unclear if this is for an organization and/or an individual. **Proposal:** Clarify.
7. Performance Measure 9.1 – certified logging program: **Concern:** It is unclear what determines a certified logging program. **Proposal:** SICs need to define certified programs.
8. Performance Measure 9.1 – certified loggers: **Concern:** This highlights/promotes third party programs like the Master Logger program that has their own standards. **Proposal:** Remove certified logger requirement.
9. Performance Measure 10.1 – mill inventories: **Concern:** This term doesn't adequately cover all facilities. **Proposal:** Use "facilities" instead of "mill inventory"
10. 10.1.1 – suppliers that have training programs: **Concern:** If supplies are short there will be a loss if participants can't use suppliers that have raw material. **Proposal:** --.
11. Indicator 10.1.3 – use of BMPs, included in contracts: **Concern:** It will be very difficult to verify if BMPs are being used. In some states BMPs are voluntary (e.g. Maine and New Brunswick). In other states they already have requirements for BMPs. If not able to verify BMP use, it could nullify the contract. **Proposal:** Remove it OR use "promote" OR include it in information to land owners.
12. Indicator 10.2.1 – verifiable monitoring system: **Concern:** It is unclear what this means. Would state's system cover this requirement? **Proposal:** Define it AND/OR provide some criteria for clarification.
13. 11.1.2 & 3: **Concern:** It is unclear what criteria are used for meeting these indicators – how do you verify something has been prompted. **Proposal:** Clarify the intent so that it is auditable.
14. Indicator 12.1.2 – significant risk: **Concern:** how is the auditable? **Proposal:** Clarify this is outside the US and Canada.
15. Objective 12 – controversial sources: **Concern:** This term should be defined in a way that is unique from FSC. **Proposal:** Define it with a list of the key components - "wood harvested

illegally; wood harvested without authorization on lands protected by law or planned for protections; and wood harvested on parks and reserves without legal authorization”.

16. Indicator 13.1.2 – significant risk: **Concern:** It is unclear how an auditor would measure compliance and how significant risk would be assessed. **Proposal:** Define significant risk OR provide criteria.

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

1. Objective 14: **Concern:** There is an interpretive difference between “commitment” and “compliance”. To some compliance is too strong. To others, either terms will end up with the same auditing results. **Proposal:** --.
2. Indicator 14.1.4 – respect: **Concern:** This term is vague – how do you audit. **Proposal:** Clarify.
3. Performance Measure 14.2 – shall: **Concern:** The performance measure and indicator are inconsistent – performance measure is steps and the indicator is a policy. **Proposal:** --.
4. Indicator 15.1.1 – some of the following: **Concern:** It is unclear how many is “some”. **Proposal:** --.
5. 15.1.1 to 15.1.4: **Concern:** Typo in numbering, missing 15.1.2 and 15.1.3. **Proposal:** Change “15.1.4” to “15.1.2”.
6. Objective 17 – community involvement: **Concern:** This seems to imply an involved stakeholder process that can be hard to control unless you hire a facilitator like the Keystone Center to help us. **Proposal:** Rename it “To broaden the practice of sustainable Forestry.”
7. Objective 17.1: **Concern:** This is missing supporting SIC economic viability. **Proposal:** Add “financial support for SICs”.
8. Performance Measure 17.1 – and other landowner cooperative programs: **Concern:** --. **Proposal:** Use “and/or” instead of “and”.
9. Indicator 17.1.4 – forest legacy: **Concern:** --. **Proposal:** Add Forestry Legacy “program” to clarify it is the Forest Service program.
10. Performance 19.1 – prepared by the certification body: **Concern:** This will put more burden for the certification body to create a finalized report. **Proposal:** Use “prepared and/or approved by” instead of “prepared by”.

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. 5 year cycle is better for chain of custody and costs. This would also be difficult to conduct joint audits for participants with dual certification with Forest

Sustainability Council. **Response:** It is a new International Standards Organization (ISO) requirement. SFI Inc. is seeking an exemption or delay in implementing this change with the accreditation bodies (ANAB and SCC).

2. Continuous certification: **Concern:** Without this option it is more costly and onerous. **Response:** Through conversation it seems that even under ISO there are ways to have continuous certification although it may not use that term.
3. APQ 7.1 – certification, recertification, or surveillance: **Concern:** This language is not consistent with the principles section that doesn't talk about all three. **Proposal:** Make it consistent.

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