



**SFI Standard Review Workshop Summary
Sustainable Forestry Initiative Inc. and The Keystone Center
Sacramento, CA
February 18, 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. Q: Do any changes overlap with the proposed LEED standard? A: SFI Inc. reviewed gaps with the LEED standard and attempted to fill some of the gaps where feasible. SFI Inc. will continue to work with USGBC to ensure the SFI Standard is recognized in the LEED Standard. SFI Inc. also reviewed government and corporate procurement policies, as well as environmental standards recognizing forest certification programs, ensuring the draft 2010-2014 SFI Standard minimizes gaps and addresses important issues.
2. Q: Is the preface auditable, or does the audit start at the Principles, Objectives, Performance Measure? And, should the preface be included in the audit process? A: The intent is to not include the "Preface" in an audit. Whether the preface is included in an audit will be discussed by the SFI Standard Review Task Force. **Proposal:** Clarify where the actual "auditable SFI Standard" begins.
3. Q: Why change the Principles? A: SFI Inc wanted to more accurately map or align the principles to the objectives and to the Montreal Process.
4. Q: What are the major changes between old introduction and the new preface? A: The new preface is expanded to include more information about the entire SFI Standard, as well as addressing emerging issues.
5. **Concern:** The amount of structural changes made to the Standard creates additional costs which are hard in these economic times. **Proposal:** SFI Inc. should look at minimal structural changes to the SFI Standard.

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

1. Objectives 1-7: **Concern:** This is missing a reference to use of professional loggers and/or managers. **Proposal:** Add language.
2. Indicator 1.1.1, F and G - biomass energy: **Concern:** Bioenergy feedstock is not a complete timber issue, but a definitional issue. It may be costly to inventory. **Response:** Bioenergy

feedstock was highlighted to alleviate concerns that as bioenergy become more prevalent the standard needs to clearly show applicability to bioenergy harvests for forest conservation.

Proposal: Address this issue under Objective 4 or in areas dealing more with environmental issues.

3. Objective 2 – carbon management: **Concern:** How will carbon management be measured or audited? Are there any performance measures or indicators directly related to carbon management and climate change? How would this be audited? **Proposal:** Define “productivity” – Add carbon to the definition of productivity, rather than having a full objective dedicated to carbon. **Response:** performance measure 2.4.4 – provides for some carbon management. The intent of adding carbon management was to recognize that forests provide for carbon management.
4. Indicator 2.3.7: **Concern:** The addition of “minimize” implies that roads are bad when they are an asset. **Proposal:** Use “manage roads instead or use language to better address the intent, which should be “participants should construct and maintain a road system.”
5. Performance Measure 2.5 – genetically engineered (GE) and biotechnology: **Concern:** Removing of GE trees and biotechnology from the SFI Standard may leave a gap if they are approved for deployment before the 2010-2014 standards are revised. It will be difficult to be added back in after removed. **Proposal:** Keep GE and biotech references in the 2010-2014 Standard.
6. Indicator 3.2.4 -- vernal pools and ecological significance: **Concern:** The definitions for ecological significance and vernal pool are vague and hard to measure. It is easier to measure pool size with GIS mapping. This will cause confusion and landowners may not have the expertise and data to define what is ecological significance. **Proposal:** Clarify and/or define intent. **Response:** The intent was to give the PP flexibility, rather than providing a one size fits all definition for land managers to address in their forest management plans.
7. Objective 4.1.6 - old growth forest: **Concern:** Alaska’s forests are old, many over 100 years so it will take 50 years to start harvesting new growth. **Proposal:** Leave the language for now; not sure how to address this concern.
8. Objective 4: **Concern:** Stand level and landscape level biodiversity protection has different needs. It will be difficult to manage at every stand. **Response:** The requirements are for both stand and/or landscape level biodiversity. Where there are multiple ownerships, landscape level biodiversity protection is already occurring. Will need to look collectively at stand and landscape levels, but not all at each level.
9. Indicator 4.1.4 – pollinator habitat: **Concern:** “Pollinator habitat” will be different in different regions; this may require a re-inventory. **Proposal:** Remove “pollinator habitat” OR define “pollinator habitat” to clarify it further. If the term remains, include a regional aspect rather than continent wide. **Response:** Inclusion of the term was to address what some perceive as declining pollinator species in some locales.
10. Indicator 4.1.4: **Concern:** Bioenergy feedstock harvesting singled out as unconventional. **Proposal:** Define harvesting more accurately and do not single it out. Workshop participant will provide/propose a definition to the online survey system.

11. Indicator 4.2.3 – collection of information: **Concern:** How will an auditor evaluate an acceptable “information collection?” **Proposal:** Further define or clarify acceptable information collection or change the language to be about becoming more knowledgeable about climate change.
12. Objective 5 – limits on clearcut size: **Concern:** Special sites in Alaska require larger clearcut sizes for economic efficiency (e.g. on islands that require base camps). **Proposal:** Provide exceptions to the objective for economic and extreme situations. Build in some flexibility for these rare occurrences.

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

1. Objective 8: **Concern:** What was the intent behind the drastic change to Objective 8? Why was the approach necessary? **Response:** Procurement only operations felt the one objective related to the fiber sourcing was insufficient. Also there were a number of important issues embedded within Objective 8 that warranted being elevated to Objective level.
2. Performance Measure 8.1: **Concern:** Changing from “encourage” to “shall” seems strong. **Proposal:** Change to “provide for access to the landowner via a logger or wood producer.”
3. Performance Measure 8.1 – after harvest: **Concern:** Implies one only provides information after harvest and not before. **Proposal:** Clarify intent.
4. Indicator 8.1.1: **Concern:** If there is a middle man between buyer and landowner it seems like stepping in the middle to provide information directly to the landowner. **Proposal:** Clarify whether it is acceptable to get information to landowner directly and indirectly (through supplier).
5. Indicator 8.1.2: **Concern:** Landowners is too broad—larger landowners would do SFI, smaller landowners or family forest landowners would do American Tree Farm System. **Proposal:** Clarify that ATFS is for family forest landowners.
6. Objective 9: **Concern:** Use of professional loggers and/or foresters is not just for procurement (objectives 8-13), also for management (objectives 1-7). **Proposal:** Add this requirement to Obj. 1-
7. Indicator 10.1.1: **Concern:** This will preclude the family forest landowner or tribes who provide logs once or twice a year and are not trained. **Proposal:** Clarify language.
8. Indicator 10.1.1; **Concern:** Implies 100% must be qualified logging professionals which may be impossible to achieve or maintain. **Proposal:** Clarify this means showing a plan to move towards 100%. Must be clear that QLPs are not 100% utilized by forest land managers, but only procurement operations.
9. Indicator 10.1.1 – suppliers: **Concern:** Sometimes the supplier is not in the woods, therefore doesn’t need training. **Proposal:** Clarify that supplier means the logger in the woods OR use the term wood producer.
10. Indicator 10.1.3 – Best Management Practices (BMP): **Concern:** There could be an antitrust risk, as it could be viewed as a collective group increasing price and excluding a sector of market. **Proposal:** Clarify language. **Response:** All proposed revisions have been reviewed by antitrust

counsel and will be reviewed again prior to any Board action to ensure the SFI program is in compliance with antitrust laws and regulations.

11. Indicator 10.1.3 – BMP: **Concern:** Requiring BMPs in a contractual agreement that may have unintended consequences or may not be enforceable. **Proposal:** Clarify language.
12. Objective 11 – title: **Concern:** Inconsistency between title and indicator 11.1.1; implication in the title is to promote all three areas (biodiversity, biodiversity hotspots and promoting major tropical wilderness areas), when indicator 11.1.1 doesn't. **Proposal:** Change title to: "Promote Conservation of Biological Diversity".
13. Definition - qualified logging professional (QLP): **Concern:** This doesn't align with new objectives; it is not just objective 8. **Proposal:** Change reference from objective 8 to 16.2.
13. Definitions - Certified logger and QLP: **Concern:** Confusion about whether "an individual or person" is an organization or just one person. In some states, i.e. California, "person" includes the corporation, limited partnerships, etc. It is the company's responsibility to train their loggers and ensure proper training and education. **Proposal:** Add/acknowledge "person and/or organization/company."
14. Definitions - certified logging professionals and QLP: **Concern:** The difference between them is not clear. **Proposal:** Clarify the difference. **Response:** QLP is a logger who has completed the SFI training, but a certified logging professional is an individual who has gone a step above and beyond the QLP and completed a certification program (e.g. Master Logger or ProLogger).
15. Definition – Illegal logging: **Concern:** Embedding the definition of illegal logging within the definition of controversial sources will be confusing for the public; they won't know where to find it. **Proposal:** Keep illegal logging as a stand alone, alphabetical order OR keep illegal logging in alphabetical order and add "see controversial sources".
16. Definition - Illegal logging: **Concern:** The definition seems to preclude even legally logged trees on parks and reserves. **Proposal:** Clarify if it is ok to accept product from parks and reserves if it is legally acceptable, part of management plans for the park or reserve.
17. Definition - Controversial sources: **Concern:** The terms "strong legal framework" is too vague. **Proposal:** Add "strong legal framework that include effective social laws."
18. Definition - Controversial sources: **Concern:** Missing references to immigration status. **Proposal:** Consider or add immigration status to the list of bulleted items.
19. Technical writing issue: **Concern:** The text needs review by a writing professional. **Proposal:** The Standard should undergo a final review by a professional editor to clean up language, structure, etc.

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

1. Indicator 14.1.4 – respect: **Concern:** The term respect is vague and hard to audit. **Proposal:** Define respect and/or protected areas (either in this indicator or in definitions section).
2. Indicator 15.2.1b – added phrase: **Concern:** don't need the added phrase "considering both conventional and bioenergy feedstock harvesting. **Proposal:** Delete added phrase.
3. Objective 16: **Concern:** adding additional training topics will require more course time/days. **Proposal:** Clarify that additional topics will be covered in current training time allotments.
4. Performance Measure 19.1: **Concern:** It is not clear about what type of report to provide. **Proposal:** Add "Audit summary report" to certification scheme. Key change there is actual language about who develops and submits the report to SFI Inc.

Changes to the Audit Procedures and Auditor Qualifications Changes

1. 5.4 Recertification Cycle: **Concern:** 3 year cycle doesn't align with SFI Standards review cycle (5 years). **Proposal:** Change Standards review cycle to 6 years.
2. Annual Surveillance Audit cycle: **Concern:** A surveillance audit would need to touch all four corners. **Proposal:** Clarify how do surveillance audit results factor in to the recertification cycle?
3. Definition - Second party verification: **Concern:** This doesn't exist anymore; it is confusing to still have language about it. **Proposal:** Remove it from definition section.
4. **Concern:** Auditors' interpretation of some of the more vague elements. **Proposal:** provide an interpretation document or workshop for auditors on changes.
5. Auditors prefer to see operations under varying conditions, i.e. seasonal changes. – According to ANAB, IAF Mandatory Document for Advance Procedures may allow for some variation and flexibility in auditing procedures.

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