



**SFI Standard Review workshop
Charleston, S.C.
March 26, 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. Overall: **Concern:** The standards are wordy with lots of “for examples” (e.g.). The “for examples” raise question about why that example was used and not another. **Proposal:** Use better definitions and less verbiage.
2. Overall: **Concern:** There appears to be some conflicting standards – what happens if different standards are in conflict. **Response:** The conflict would be addressed through the interpretations committee process.
3. Overall: **Concern:** The terms protection and conservation seem to be the same thing; why use both? **Proposal:** Use the word “conservation” not “protection”.
4. Overall: **Concern:** The term carbon in the definition of sustainable forest doesn’t work. **Proposal:** Remove it.
5. Overall: **Concern:** There are lots of nebulous terms that don’t improve land management (e.g. pollinator habitat, carbon, climate change). **Proposal:** Focus the document on things that make a difference on the ground.

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

1. Indicator 1.1.1 – climate induced change: **Concern:** The term is vague; how would this get audited. **Proposal:** -- none offered.
2. Indicator 1.1.1: **Concern:** There is redundancy in definitions. **Proposal:** Clarify the definition of conventional harvesting.
3. Indicator 1.1.1g – sustainable levels for bioenergy: **Concern:** What is the definition of “sustainable”? How much is sustainable? This is redundant if bioenergy harvesting is covered by conventional harvesting. **Proposal:** Remove this and add to conventional harvesting definition. **Response:** This was included to recognize increased management and harvesting for bioenergy as part of conventional forest management operations. This was not intended to be for bioenergy operations that follow conventional operations and use logging residue.
4. Indicator 1.1.4 - the e.g. (improved data, long-term drought, etc.): **Concern:** This may not be possible. **Proposal:** Move the e.g. to another place such as in the definitions.

5. Objective 2 – carbon: **Concern:** This will open the door for other single pollutants to be included. **Proposal:** Remove the term and any other single elements.
6. Indicator 2.3.4 - woody debris: **Concern:** This conflicts with 4.1.4 and bioenergy harvests which will create confusion for auditors. **Proposal:** Remove the e.g. in 2.3.4 OR remove woody debris from 4.1.4.
7. Indicator 2.4.4 - regional climate models: **Concern:** Participants will have to take time and resources to search for a model; there are conflicting models; and what are the criteria for a legitimate regional model. How does a model change land management practices on the ground? **Proposal:** Remove. **Response:** The intent, while recognizing this is an emerging issue, was that participants would look for credible models in their regions and determine if they should be included in their plans.
8. Objective 4 – forests with exceptional conservation value: **Concern:** Does this include special sites? **Proposal:** Add “protect special sites”.
9. Performance Measure 4.1 – landscape level: **Concern:** Maintaining view-sheds on a landscape level is very difficult and would create challenges for private landowner rights. **Proposal:** Ensure SFI standard requirements do not infer that program participants have the ability to maintain landscape scale measures such as view-sheds.
10. Performance Measure 4.1 – stand and landscape levels: **Concern:** This will be hard for small land owners and will be different for different size landowners. **Proposal:** Add “at level appropriate to size/scale.”
11. Indicator 4.1.4 – pollinator habitat: **Concern:** There is no definition for the term pollinator habitat. **Response:** It was not defined because critical pollinator habitats can be different in different regions. **Proposal:** Define the term.
12. Indicator 4.2.3: **Concern:** Collection of information doesn’t improve forests or forest management. **Proposal:** Remove.
13. Objective 5 – visual and recreation: **Concern:** Visual and recreation are not linked; they don’t go together. **Proposal:** Split into two.
14. Performance Measure 5.4 – shall: **Concern:** The performance measure requires, but the indicator makes it conditional, “where consistent with forest management objectives”. **Proposal:** Make them consistent. **Response:** The qualifier in the indicators allows for flexibility as to time of year and location, sensitive areas, active operations, etc. while the performance measure makes it clear that recreation opportunities must be provided in some way.
15. Objective 6 – culturally important: **Concern:** There is no definition for culturally important. The example allows for any one to claim a “culturally important” site without evidence. **Response:** There is a definition included in the glossary. **Proposal:** Add “documented” culturally important.

16. Objective 6 – battlefields: **Concern:** Battlefields are considered culturally significant, but their boundaries are often very broad to include troop movements and so are too large to be avoided all together. **Proposal:** Remove battlefields.

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

1. Performance Measure 8.1: **Concern:** --. **Proposal:** Allow participants to utilize SIC's outreach program to meet standard.
2. Indicator 8.1.1 – shall supply: **Concern:** "Shall" implies it must be given to them, whether they have it already or not. **Proposal:** Change to "shall make available".
3. Indicator 8.1.1: **Concern:** Land owners may not understand this. **Proposal:** Change to "management of residue to consider various utilization options."
4. Indicator 8.1.1e – social: **Concern:** It is confusing to know how to manage residue for social factors; the term social is vague and undefined. **Proposal:** Define social OR remove social from the list.
5. Indicator 8.1.1f– invasive exotic: **Concern:** These terms may not mean the same thing. **Proposal:** Clarify.
6. Performance Measure 8.2 - American Tree Farm System: **Concern:** The reference diminishes the intent of the SFI approach to responsible fiber sourcing via procurement activities. **Proposal:** Move the reference to Objective 17—all program participants should be required to do this, not just procurement.
7. Objective 9 – certified and qualified logging professionals: **Concern:** These are confusing; are they interchangeable or separate? How do States' "top loggers" programs fit in? **Proposal:** Be consistent in saying "either/or" or "and". Address State programs.
8. Indicator 9.1.2 – lists: **Concern:** Who keeps the lists? Do the participants have to keep two lists (certified and qualified logging professionals)? How does this improve forests and forest management on the ground? **Proposal:** Clarify OR add "access to a current valid list".
9. Performance measure 10.2 – evaluate BMPs: **Concern:** Why does each company have to cover this? **Proposal:** Add "are monitoring or using state monitoring practices".
10. Objective 10/Definition of other wood suppliers - infrequently: **Concern:** Infrequently doesn't address seasonal suppliers, like farmers that harvest at the same time each year. **Proposal:** Remove the term "infrequently" from the definition.
11. Objective 10/ Definitions of wood producer, supplier: **Concern:** Are they the same or different? **Proposal:** Clarify the difference or sameness. If the intent is to have certified or qualified loggers on the ground say so in the documents.
12. Indicator 10.1.1: **Concern:** Certain regions cannot get as high as 100%. **Proposal:** -- none offered.

13. Indicator 10.1.1 – suppliers: **Concern:** There is no definition for “suppliers”. **Proposal:** Define suppliers OR use the term wood producers OR harvesting professional.
14. Indicator 10.1.3 – require in contracts: **Concern:** This is not practical for indirect sources. **Proposal:** Add “material delivered directly from the forest.”
15. Indicator 10.1.3 – BMPs in contracts: **Concern:** This is not practical when getting fiber from residual sources (e.g. chips). **Proposal:** Add “material that is delivered directly from the forest.”
16. Indicator 10.2.1b: **Concern:** What is the value of monitoring across the landscape, on other participants or other lands? **Proposal:** Change to “evaluate the use of BMPs across the participants wood and fiber supply area”.
17. Indicator 10.2.2 – use information: **Concern:** Rates of BMP compliance are already so high it is very hard to improve. **Proposal:** Change to “use of information... to assist participants and suppliers to maintain BMP compliance and identify areas to improve” OR remove the term “rates” and just leave it at compliance.
18. **Concern:** Licensing boards may be in conflict with laws to practice forestry. **Proposal:** Look at boards to see if there is a conflict with definition of qualified resource professional.
19. Indicator 11.1.2 – direct suppliers: **Concern:** This is a new term; undefined. **Proposal:** Define it.
20. Objectives 12 & 13: **Concern:** Why are these objectives separate? How are these auditable? **Response:** Having separate objective recognizes the importance of these issues. There are external organizations that evaluate and publish reports on the effectiveness of social laws (existence of and enforcement of) in countries throughout the world.
21. Objective 13 – social laws: **Concern:** This seems to exclude companies who have policies and programs in countries without effective social laws which do ensure these social issues are addressed. **Response:** Indicator 2 for Performance measure 13.1 addresses this issue; there needs to be a process in place to assess risk and indicator 2 requires a program participant to have a program to address any significant risk.
22. Indicator 13.1.2: **Concern:** --. **Proposal:** change reference to indicator 8.6.1. to 13.1.1
23. Page 23 – reference to applicability to North America: **Concern:** This reference gets missed. **Proposal:** Make the reference more apparent.
24. Illegal logging: **Concern:** Timber theft. **Proposal:** Emphasize “comply with all laws”; noting that when legal processes exist they should be used. Add language similar to information from APQ regarding when inconsistent practices process is suspended due to litigation.

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

1. Performance Measure 14.2 - shall take appropriate steps: **Concern:** Auditors will interpret this differently which will require significantly more work/burden of proof for program participants without any real change in current practices. **Proposal:** Use the old language; “commitment to comply” rather than “steps taken”.

2. Objective 15: **Concern:** Eliminated university cooperative programs. **Proposal:** Add a comma after cooperative efforts – "...cooperative efforts, SICs, and/or through associations..."
3. Objective 15: **Concern:** Auditors want to see the money spent and don't allow for in-kind services to SICs. **Proposal:** Include internal/proprietary research and in-kind services to SIC.
4. Indicator 15.1.1 Avoidance of illegal logging and controversial sources: **Concern:** These are not research or technology elements. **Proposal:** Move them to another section.
5. Performance Measure 15.1. **Concern:** Current wording seems to dictate that research must be done on the environmental benefits and performance of forest products. **Proposal:** Make it more flexible, add "and/or" environmental benefits
6. Indicator 15.2.1b – bioenergy feedstock harvesting: **Concern:** This is a new issue and currently research in this area is very low or non-existent.; don't know where this is going so how can we have a standard for it. **Proposal:** Remove "bioenergy feedstock", just use "harvesting".
7. Indicator 16.2.1j: **Concern:** There are varying view points on this issue within the SICs. This essentially requires participants to inform their suppliers of other technology and business opportunities. **Proposal:** Remove j.
8. Indicator 16.2.1 – participation in or support of SICs: **Concern:** Some SICs don't exist or are weak; doesn't provide an alternative. **Proposal:** --.
9. Objective 17: **Concern:** This has similar challenges to objective 8, distribute or make available. **Proposal:** Add shall distribute or make available.
10. Objective 17: **Concern:** This gets to landowners in different ways already. **Proposal:** Put this in objective 8.
11. Objective 18 – public lands: **Concern:** Public lands is not defined and how will this address lands that are quasi public (privately owned, managed publically). **Response:** Public lands are defined in the glossary. **Proposal:** Revise the definition of public lands to allow for quasi public lands.
12. Definition of Forests with Exceptional Conservation Value: **Concern:** This needs further clarification. **Proposal:** Change "with" to "of".

Changes to the Audit Procedures and Auditor Qualifications Changes

1. 3 year cycle: **Concern:** Other standards are still on a 5 year cycle. **Response:** It is a new ISO requirement. SFI Inc. is seeking an exemption or delay in implementing this change with the accreditation bodies (ANAB and SCC). **Proposal:** Allow for exemptions.
2. Continuous certification: **Concern:** It is important to keep this option. **Proposal:** Include continuous certification in the standard.
3. Implementation of 3 year cycle: **Concern:** How will this be implemented? 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:** It is likely that participants would start the three years

cycle when their current valid certification period ends. The committee will develop a transition plan. **Proposal:** Clarify that participants will finish their current certification cycle when they recertify the clock will start on the 3 year cycle.

4. Standards Review cycle: **Concern:** If on a 3 year cycle, it will not match the SFI standards review process. **Proposal:** Change standards review process to every 6 years.

Other Issues

1. **Comment:** Need continual education on SFI.
2. **Question:** What is SFI doing to be more competitive, more recognized in the market place?
Response: Overview of SFI Inc.'s 2009 market/outreach strategy presented by Rick Cantrell.
3. **Question:** Any SFI plans for outreach in Europe? **Response:** Have been focusing resources in North America first, doing some work in Europe with customers and via PEFC, but have limited resources for marketing in Europe.
4. **Comment:** Annual conference need to have a session/day for marketing and sales vice presidents and others to get the information face to face. This should have a special price for just this session. **Response:** This year's conference will have a session on marketing.

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