SFI Standards Revision Public Comment Survey

Comments Received during October 23 – November 22, 2019 Public Comment Period

The Standards revision process ensures credibility and transparency allowing everyone to participate. Broad involvement from the conservation community, Indigenous communities, forest products industry, brand owners, private forest landowners and public forest managers, government agencies, trade associations, landowner associations, academia, and others are integral to the development of the SFI 2022 Standards. Public comment periods are part of this process. All SFI Standards and Guidance documents were available for comment.

The working draft of the SFI 2022 Standards released May 1, 2020 was the result of input from comments submitted during the first 30-day public comment period which ran from October 23 – November 22, 2019.

Please direct any questions to Gregor Macintosh (gregor.macintosh@sfiprogram.org), SFI Senior Director, Standards.

Table of Contents:

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
		Comments #1 - # 7 relate to requirements for diversity of forest cover types and landscape level biodiversity.		
1	PM 1.1 1.1.1/ PM 4.2	The current Standards incorporate various considerations of landscapes, including documentation of forest cover types and age or size classes at the individual ownership or landscape scale. It requires participants working individually or collaboratively to support diversity of native forest cover types and age or size classes that enhance biological diversity at the landscape scale. However, in the guidance section, only wildlife habitat diversity is discussed, with the only example given of providing early successional conditions where these can help add a needed landscape condition. The ambiguity with this and the lack of additional specificity in defining what is meant by supporting diversity of native forest cover types or age or size classes that enhance biological diversity at the landscape scale is a significant deficiency in the standards. In many landscapes, the needed forest conditions are not early successional stages, but instead are late successional conditions. In many landscapes, adding early successional conditions will not contribute to landscape biodiversity needs. While the expectation should not be for program participants to provide the needed native forest cover types or age or size classes, they should at least collaboratively support the identification of these needs and possible ways that they could be provided. / / Further confusion exists in identifying appropriate scales for analysis of landscape considerations. While flexibility is needed in defining landscapes, effective consideration of conservation objectives at landscape scales needs better clarification. Standards should / / help define appropriate scales for application in terms of landscape considerations of biodiversity and species habitat. Similarly, expectations of program participants for addressing biodiversity and threatened and endangered species at landscape scales needs clearer definition and guidance. Finally, as discussed further under FECV,		**Comment addressed with edit to Indicator 4.1.4**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
		guidance for appropriate use of classification systems of forests applied to landscape assessments is needed. I believe that SFI as an organization should provide assessments and tools that support certificate holders in fulfilling this requirement.		
2	4.1	More development of and/or attention to the landscape context relative to biodiversity. Landscape was new in 2015 - time to advance the concept.		**Comment addressed with edits to Indicator 4.1.3**
3	Obj 4	The objective is a long sentence that is unclear and open to interpretation. Much of the text describes how the objective of conserving biological diversity will be achieved. Objectives should be clear and concise, in its current form this objective is very confusing to the reader. Most other objectives do not include how the objective should be met in the description of the objective, the 'how' is addressed in the Performance Measures and Indicators. In addition, if the definition of conservation is to "protect plant and animal habitat" then "conservation" and "protection" are essentially the same and it would be helpful for Program Participants to identify them as being the same in Section 13. For example, FSC provides a joint definition for Conservation/ Protection and indicates that they are used interchangeably. Because "conservation" has two meanings in the SFI definitions, when the first of these definitions is intended (protect plant and animal habitat) then consider using "protection" for consistency. If they are intended to be different, recommend removing the word 'protection' from the definition of 'conservation'.	Consider rewording: *"To conserve native biological diversity at the stand- and landscape-level and across a diversity of habitat types and successional stages including the conservation of forest plants and animals, including aquatic species, threatened and endangered species, Forests with Exceptional Conservation Value, old-growth forests and ecologically important sites"*	**Comment addressed with edit to Objective 4 text.**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
4		"SFI Program Participants are now required to work individually or collaboratively to support the diversity of native forest cover types and age or size classes that enhance biological diversity at the landscape scale (Indicator 4.1.3)." A forester must first understand exactly what the outcome of this standard looks like, before they can apply specific management techniques to accommodate this – in other words, not many foresters totally understand the concept of "biological diversity". The definition seems to vary considerably from the preferred "Longleaf Pine Ecosystem". Most landowners who are not foresters would have difficulty understanding how this would apply to their land management with the verbiage that is used here.		**Comment addressed with edit to Indicators 4.1.3 and 4.4.3.**
5	4.1.1	This indicator refers to 'native biodiversity', which is good and should be the focus of biodiversity of conservation efforts; however, the title and the description of the objective along with other indicators only refer to 'biological diversity'. Consistent use of 'biodiversity' or 'native biodiversity' in the wording of Objective 4, associated Performance Measures, and Indicators will increase clarity and reduce confusion for Program Participants.	Consider using 'native biological diversity' consistently where the term 'biological diversity' currently occurs. If choosing to use both terms, it should be made clear (e.g., through definitions in Section 13) why the terms are being used in different places within the Standard.	**Comment addressed with edit to Indicator 4.1.1**
6	4.1.2	"Development of criteria and implementation of practices, as guided by regionally based best scientific information". This description of practices guided by 'regionally based best scientific information' sounds very similar to the definition of "best management practices" (a more inclusive definition than the one currently defined in Section 13). The use of similar, but different, terminology in different parts of the Forest Management Standard (e.g., best management practices, practices guided by best scientific information, management	Consider choosing a single term to use to signify practices based on the best available information, define in Section 13, and use consistently throughout the Forest Management Standard. If separate terms are needed, each of the terms used should be defined in Section 13.	**Comment addressed by review the Standard requirements to ensure consistent and correct use of these terms.** **Additionally, new defined term "practices" added to SFI Section 14 - Definitions.**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
		practices, etc.) reduces clarity for Program Participants and makes the objectives feel disconnected.		
7	4.3	A few of the terms used in this Performance measure and associated indicators are unclear including: • Natural heritage data • Ecologically important Natural heritage data would benefit from a definition to provide direction to Program Participants. 'Ecologically important' should be defined as this is something that Program Participants will be audited on.	Recommend defining these terms in Section 13 (glossary).	**Comment addressed with new defined term "ecologically important" added to Section 14 - Definitions and edits to Performance Measure 4.1 and Indicator 4.3.1.**
		Comments #8-#19 relate to Standard requirements for Threatened & Endangered Species / Species at Risk (SAR).		

SFI Standards Revision Public Comments

October-November 2019 Public Comment Period   **Section 2: Forest Management**   **SFI Review Task Force Recommendations**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
8	4.2	Standard should consider NatureServe G-listings to prioritize T&E species		**Comment addressed with edits to Performance Measure 4.2 and the clarification that the concept of Forest with Exceptional Conservation Value includes critically imperiled and imperiled species and natural communities.** **"Natural communities" is now a defined term in Section 14 - Definitions.**
9	4.2	Promote awareness of G3 species where management actions can prevent further decline and regulatory restrictions.		**Comment addressed with edits to Performance Measures 4.1. and 4.2.**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
10	4.2	Prioritize and call out specific endangered species and species at risk, such as Caribou and requirements for their management.		**Task Group determined that prioritizing some species for management over others was not sound science and that all threatened and endangered species should be considered equally.** **See edits for Performance Measures 4.1 and 4.2.**
11	4.2	Change T&E Species to G-ranking across PMs and Indicators.		**Comment addressed with edits to Performance Measures 4.1. and 4.2.**
12	4.2	Increasingly Global Standards are using the IUCN Red List and CITES as the basis for species of concern - Should SFI consider doing the same?		**Comment addressed with edits to Performance Measures 4.1. and 4.2.**
13	4.2	Standard should address inconsistencies between federal and state/provincial SAR regulation.		**Comment addressed by edits to PM 4.1.and 4.2.**
14	4.1.5	Standard should focus on species that are vulnerable but not yet listed.		**Comment addressed with edits to PM 4.1 and PM 4.2**
15	4.2	Cross border T&E /SAR - how to treat?		**Comment addressed by edits to PM 4.1.and 4.2.**
16	4.2	Ensure info is adequate to evaluate the T&E / SAR species status to be sure if meets the standard.		**Comment addressed with edits to Indicator 4.3.1.**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
17	4.1.5	Standard should be more inclusive and not restricted to T&E / SAR - abundance is an important aspect of biodiversity in addition to rarity.		**Comment addressed by edits to PM 4.1.and 4.2.**
18	4.2	available data for T&E that's accurate/updated & includes follow-up of status after management occurs.		**Comment addressed by edits to PM 4.1.and 4.2.**
19	4.2	Standards should not consider S1 and S2 species		**Comment addressed with edit to Indicator 4.1.5.**
		Comments #20 - #34 relate to Standard requirements for Biodiversity and Forest with Exceptional Conservation Value (FECV).		
20	4.1	Look at how successive harvest strategies (e.g. shelterwood / 2nd entry removal of residuals) can benefit different T&E species through time. (e.g. shelterwood benefits Cerulean Warbler; 2nd entry residual removal creates Gold Winged Warbler habitat.		**Comment addressed with edits to Indicators 4.4.2 and 4.4.3.**
21	4.1.5	"Program to address conservation of known sites with viable occurrences of significant species of concern". It is unclear what constitutes a "significant species of concern", this term should be defined in Section 13 (glossary).	Define significant species of concern in Section 13 (glossary) or provide more clarity of what qualifies as 'significant' within this indicator.	**Comment addressed with edits to PM 4.1 and 4.2.** **New defined terms ecologically important and natural communities added to Section 14 - Definitions to replace the former term _significant species of concern._**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
22	4.2	Training for foresters for at risk species more defined around management		**Comment addressed with edits to PM 12.1 and 12.2.** **Note: Preamble to Standard to be rewritten in the next version of the Standard.**
23	4.1	Forest Management activities should not: 1) diminish a FMU/FME native biodiversity; 2) negatively impact a FMU/FME rare, threatened or endangered species.		**Comment addressed with edits to PM 4.1 and 4.2.**
24	11.2	Standard should address training for T&E species for operators and education on operations for biologists		**Comment addressed with edits to PM 12.1 and 12.2.**
25	4.2	Clearly define FECV and broaden to all forest harvests		**Comment Addressed by Fiber Sourcing Task Group.**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
26	4.2	FMU/FME should recognize areas of Exceptional Conservation Value and only conduct activities which maintain or improve the associated conservation value. Should include Old Growth as appropriately defined for the FMU/FME.		**Comment addressed with edits to Performance Measure 4.2 and the clarification that the concept of Forest with Exceptional Conservation Value includes critically imperiled and imperiled species and natural communities.** **"Natural communities" is now a defined term in Section 14 - Definitions.**
27	4.2	FECV flexibility at local level important		**Comment addressed with edits to Performance Measure 4.2 and the clarification that the concept of Forest with Exceptional Conservation Value includes critically imperiled and imperiled species and natural communities.** **"Natural communities" is now a defined term in Section 14 - Definitions.**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
28	4.2	Can local areas add context beyond G1/G2 categories		**Comment addressed with edits to Performance Measure 4.2 and the clarification that the concept of Forest with Exceptional Conservation Value includes critically imperiled and imperiled species and natural communities.** **"Natural communities" is now a defined term in Section 14 - Definitions.**
29	4.2	Keep away from setting strict standards for % amounts of FECV.		

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
30	4.2	Provide regional identification of FECVs and away from certificate holders identification.		**Comment addressed with edits to Performance Measure 4.2 and the clarification that the concept of Forest with Exceptional Conservation Value includes critically imperiled and imperiled species and natural communities.** **"Natural communities" is now a defined term in Section 14 - Definitions.**
31	4.2	Move to data-based determination of FECV and away from subjective determination		**Comment addressed with edits to Performance Measure 4.2 and the clarification that the concept of Forest with Exceptional Conservation Value includes critically imperiled and imperiled species and natural communities.** **"Natural communities" is now a defined term in Section 14 - Definitions.**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
32	4.1	Recognition of forest ecosystem dynamics/change, and concern about static mapping of locations.		**Comment considered but not adopted.**
33	4.2	Can active management be used to create/maintain FECV		**Comment addressed with edits to Performance Measure 4.2 and the clarification that the concept of Forest with Exceptional Conservation Value includes critically imperiled and imperiled species and natural communities.** **"Natural communities" is now a defined term in Section 14 - Definitions.**
34	4.2	Standard should define FECV in terms of their value.		**Comment addressed with edits to Performance Measure 4.2 and the clarification that the concept of Forest with Exceptional Conservation Value includes critically imperiled and imperiled species and natural communities.** **"Natural communities" is**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
				now a defined term in Section 14 - Definitions.
		Comments #35 - #40 relate to Standard requirements regarding use of forest chemicals.		
35	2.2	Quantify use of herbicides.		**Comment considered but not adopted.**
36	2.2	List pesticides / herbicides that SFI will not accept?		**Comment considered but not adopted.**
37	2.2	"Indicator 2.2.4 prohibits World Health Organization 1A and 1B pesticides, except where no other viable alternative is acceptable, and Indicator 2.2.5 bans pesticides listed under the Stockholm Convention on Persistent Organic Pollutants." Are any of these pesticides available in the over-the-counter markets, or do licensed pesticide applicators have access to them? IF the answer is "No", then does this really need to be mentioned in a Standard? As a landowner, I do not want to go to reference a website to find out that none of the pesticides that I use are subject to this standard. IF there are certain pesticides that are disastrous and still available, why not list their names?		**Comment considered but not adopted.**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
38	2.2	Minimized chemical use' does not provide adequate direction to Program Participants to effectively reduce chemical use as there is no quantitative direction (e.g., threshold) or qualitative direction (e.g., document current use, strategies to reduce, and use after strategies are applied).	Suggest "Minimized chemical use required to achieve management objectives. Document chemical use, strategies applied to minimize use, and reduction in chemical use as a result of the strategies."	**Comment addressed with edits to PM 2.2.** **New definition of "integrated pest management" adopted - see Section 14 - Definitions.**
39	2.2	FSC goal of "eventual elimination" of pesticide use ins not feasible - SFI approach is better.		**Comment addressed with edits to PM 2.2.** **New definition of "integrated pest management" adopted - see Section 14 - Definitions.**
40	10.1	standard should allow/provide for use of best available tools: GMO where appropriate (ID?), Herbicides/chemicals when appropriate (keep 2.2 as stated)		**Comment considered but not adopted.**
		Comments #41 - #44 relate to Standard requirements regarding use of genetically modified trees (forest tree biotechnology).		

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
41	4.4	allow GMOs to conserve threatened species (i.e. American Chestnut)		**Comment considered but not adopted.** **However, Indicator 11.1.2 was edited to reflect use of the term genetically modified in lieu of genetically engineered. SFI Policy on Forest Tree Biotechnology has also been edited to reflect his change.**
42	10.1.2	allow GMOs to conserve threatened species (i.e. American Chestnut)		**Comment considered but not adopted.** **However, Indicator 11.1.2 was edited to reflect use of the term genetically modified in lieu of genetically engineered. SFI Policy on Forest Tree Biotechnology has also been edited to reflect his change.**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
43	10.1.2	Why are GE (genetically engineered) trees an issue? IS this an extension of the "Non-GMO" movement? What is the difference between GE and GM (genetically modified) trees, or are they the same? IS this referring to clones? How are genetically enhanced tree seedlings classified, such as "improved Loblolly pine"? How is a purchaser of seedlings for forest regeneration able to discern the difference? Why is their use being limited, if SFI is still researching the effects? More and more GM (genetically modified or enhanced) seedlings are being used every day. PEFC has restrictions on GE trees until 12/31/2015 – what happened after that? Did PEFC make a determination that was not communicated, so that the limitation could be removed? Are the "GE" tress still restricted by PEFC?		**Comment considered but not adopted.** **However, Indicator 11.1.2 was edited to reflect use of the term genetically modified in lieu of genetically engineered. SFI Policy on Forest Tree Biotechnology has also been edited to reflect his change.**
44	10.1.2	Openness to using genetics/transgenic materials. Could be used for conservation of forest species threatened by invasive pests and pathogens (e.g. Am. Chestnut)		**Comment considered but not adopted.** **However, Indicator 11.1.2 was edited to reflect use of the term genetically modified in lieu of genetically engineered. SFI Policy on Forest Tree Biotechnology has also been edited to reflect his change.**
		Comments #45 - #51 relate to Standard requirements regarding conversion of forest cover type and conversion to non-forest use.		

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
45	1.2	The Resources Committee worked on forest conversion language in 2019, that was eventually adopted as guidance to Performance Measure 1.2. That language explicitly described a hierarchical process for justifying forest conversion. I propose that the guidance be more formally codified into the revised Standards language.	**SFI Forest Management Standard and Conversion of Forest Cover Types, Recommended Principles and Guidance (February 19, 2019).**	**Comment addressed with edits to PM 1.2.**
46	**Section 13**	Define Land Use change		**Comment considered but not adopted.**
47	1.2	Standard needs more stringent requirements for conversion incorporating consideration of social and aesthetic impacts and demonstrate an ecological advantage- only use native species		**Comment addressed with edits to PM 1.2.**
48	1.2	Standard needs alignment with PEFC on issue of "conversion".		**Comment addressed with edits to PM 1.2.**
49	1.2	Conversion of Forest Cover types needs clarity; currently broad interpretations. If the original intent was for small forests/ native pine conversions, limit the PM to address this.		**Comment addressed with edits to PM 1.2.**
50		Address conversion to different cover type in a clearer way.		**Comment addressed with edits to PM 1.2.**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
51	1.2	I am not sure that I understand that the standards prohibit conversion of forest types, but they encourage ecological community diversity. The standards use of the word forest cover type change in reference to a restriction on conversions is confusing. For example, as an example, the standards suggest that changing the species mix to possibly avoid Emerald Ash Borer. Changing species mixes (or forest cover types) is not a conversion – very confusing. A conversion is when an area that was growing a forest cover type (or other form of agricultural use) out of production for something other than another agricultural purpose – development is the correct example. Developments are conversions; they are NOT sustainable agricultural purposes. Forest cover type changes occur, and they can be sustainable, since the area was not taken out of production. "Justified circumstances could exist if the conversion: c. does not create significant long-term adverse impacts on Forest with Exceptional Conservation Value, old-growth forests, forests critical to threatened and endangered species, or special sites." These justifications are difficult to interpret and hard to apply to on the ground situations. Who determined that these practices justify conversions? Does a landowner have to pay to have someone make this determination? Does a landowner have to ask for forgiveness if their management has the appearance of a conversion?		**Comment addressed with edits to PM 1.2.**
		Comments # 52- # 56 relate to standard requirements for definition of best management practices and consistent use of the term.		

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
52	3.1	There are a number of references within the standard related to "best management practices", "practices", "best practices", "forest management practices", "management practices", and "protection measures". Best management practices is the only term defined and the definition is related only to water quality. The use of these different terms is confusing and could result in inconsistent application of the standard. The definition of best management practices needs to be more inclusive of practices to protect water quality and water quantity but also forest productivity, soils and biodiversity and needs to include BMPs developed internally (company and/or industry let) and externally (NGOs and/or government led).	Consider redefining "best management practices" and using the term more consistently within the standard and/or define the other similar terms used within the standard.	**Comment addressed by review the Standard requirements to ensure consistent and correct use of these terms.** **Additionally, new defined term "practices" added to SFI Section 14 - Definitions.**
53	2.2.8	The term "management practices" is not defined. If *any* management practice can be used, these indicators can become very difficult to evaluate in an audit. There needs to be an established minimum standards for the practices.	Recommend using the term "Best management practices" and expanding the definition of best management practices to be inclusive of other environmental values (not just water quality) or including a definition of "management practice" in Section 13 (glossary). Consider: "Use of best management practices appropriate to the situation, for example…"	**Comment addressed by review the Standard requirements to ensure consistent and correct use of these terms.** **Additionally, new defined term "practices" added to SFI Section 14 - Definitions.**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
54	3.1.1	The current wording of the indicator is very narrow and does not acknowledge that best management practices may be developed by industry, non-profits, or other groups, not just by governments. To apply best management practices effectively, there is a need to first identify potential impacts. Best management practices can be developed by a wide range of groups, including industry, non-profits, and others. Best management practices can be used to avoid or minimize impacts to a wide range of environmental values. By making the definition more inclusive this term can be used throughout the Forest Management Standard, which would help standardize language in the document.	Consider rewording: "Program to identify potential impacts on water resources during all phases of forest management activities and to implement regionally relevant best management practices during all phases of forest management activities to avoid or minimize potential impacts." *This suggested wording requires an update to the definition of best management practices in Section 13 (glossary)	**Comment addressed with edits to PM 3.1.**
55	3.2	It is unclear what a 'protection measure' is and how 'protection measures' differ from best management practices. As well, the Performance measure states that "protection measures are based on soil type, terrain, vegetation, ecological function, harvesting system, state best management practices, provincial guidelines, etc." Some of the items in this list are practices/ guidelines and some are environmental variables that should guide practices/ guidelines. Suggest breaking them apart to increase clarity. Protection measures or BMPs should consider local and landscape level hydrology to ensure water quality, quantity and function is maintained.	Consider rewording: "Program Participants shall implement best management practices (BMPs)to protect water bodies, wetlands, and riparian areas. BMPs should be based on soil type, terrain, hydrology, vegetation, ecological function, and harvesting system and meet or exceed regionally applicable requirements (e.g., federal, state, provincial or other rules and regulations).	**Comment addressed by clarifying that the term "protect" has the same meaning as protection which was already a defined term. See edit to definition of "protection" in Section 14 - Definitions. Also, the term "practices" is now defined in Section 14.**

56	3.2	The definition of "Best management practices" included in Section 13 (glossary) and referenced several times under Objective 3 is specific to water quality. The term best management practice can be used to describe a wide range of practices (e.g., practices for soil conservation, water quantity management, invasive species management, etc.), not just practices for the protection of water quality. Other forest management standards (e.g. FSC, CSA) do not limit their definition of best management practices to water quantity. Updating the definition so that it is not specific to only water quality practices would allow the term best management practices to be used more consistently throughout the SFI Standard (e.g., could be included under Objective 2). This would increase the consistency of the language across the different objectives and strengthen the standard. Currently the definition focuses on practices determined by governments and 'responsible entities', but does not provide examples of who these are. Recommend including industry and non-profits as examples of responsible entities.	See Section 13 (glossary) comments for a suggested definition.	**Comment considered but not adopted.**
		Comments # 57 - # 64 relate to the definition and use of the term "Program".		

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
57	**Program definition**	(Similar to above comment and to the comment below) The current wordings of Objectives, Performance Measures, and Indicators sometimes often reference the development of programs, plans, or practices. It is not clear what the differences are between these three terms nor do they seem to be used consistently within the Standard. For example, Objective 2 indicates the outcomes (ensure long term forest productivity, carbon storage and conservation of forest resources) and also includes the mechanisms (practices) for meeting the outcomes. Indicators under Performance measure 2.1 require 'reforestation plans' but 'afforestation programs'. Indicators under Performance measure 2.2 include 'management practices' but no plans or programs. Performance measure 2.3 refers to 'forest management practices' but no plans or programs. Performance measures 2.4 and 2.5 have indicators related to a 'program' but not to plans or practices.	Carefully consider what is meant by "program", "plan", "practice" and when and how to use these terms within the standard. Clearly defining and consistently using these terms will decrease confusion and increase transparency.	**Comment addressed by edits throughout the Standard where the requirement for a plan was replaced with the more comprehensive requirement for a "program" which is a defined term in Section 14.**
58	**Program definition**	There are many requirements for Programs, Plans, or Practices throughout the Standard without much guidance on the minimum requirements for these Programs, Plans and Practices. It is not clear how an auditor would assess whether a Program Participant has sufficiently developed (and implemented) their Programs, Plans, and Practices to consider an indicator as being met (minimum practices).		**Comment addressed by edits throughout the Standard where the requirement for a plan was replaced with the more comprehensive requirement for a "program" which is a defined term in Section 14.** **Also, the term "practices" is defined - see Section 14.**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
59	**Program definition**	Many objectives/performance measures require develop a "program" but do not specifically require the programs be implemented and be monitored for effectiveness, with suggested targets to be met and stipulations for adaptive management practices to be employed. Effective adaptive management requires that programs and practices be implemented, monitored, evaluated, and adapted.	Consider: 1) where mention of a "program", indicate that the program must be implemented and 2) redefining the term "program" to explicitly indicate the minimum components of the program - implementation, monitoring, evaluation, and adaptation.	**Comment addressed by edits throughout the Standard where the requirement for a plan was replaced with the more comprehensive requirement for a "program" which is a defined term in Section 14.** **Also, the term "practices" is defined - see Section 14.**
60	2.3	Several terms are used in the Performance Measure and associated Indicators and it is not always clear why one term is used over the others. These include: - Protect - Maintain - Minimize loss - Minimize impacts - Avoid excessive disturbance It is unclear whether different terms have different meanings or requirements. Defining 'maintain', 'avoid' and 'excessive' in Section 13 would help reduce confusion. Improve clarity for Program Participants by providing definitions for commonly used (but easily misinterpreted) terms and consistently using terminology throughout the Forest Management Standard.	Suggest reviewing the use of these terms throughout the Forest Management Standard, and where it makes sense reducing the number of terms used. Define all terms used that relate to protection, conservation, or avoiding or reducing impacts in Section 13.	**Staff reviewed the terms and phrases referenced in the comment to ensure clarity of intent in the requirement and made edits as necessary.**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
61	2.4	As per previous comments related to the term "programs" and the need for adaptive management to be part of any program.	Consider rewording: "Program Participants shall implement a program to protect forests from…"	
62	3.2.1	It is not clear what is "program" means here. It seems to mean the use of best management practices and it is not clear what the differences between "programs", "plans", and "practices" are.	Consider: 1) clearly defining what a "plan" is and what a "program" is; 2) consistently applying the terms "plan" and "program", and; 3) indicate that program participant must use adaptive management when implementing "plans" or "programs" (if not adaptive management is not included within the definitions of these terms).	**Comment addressed by edits throughout the Standard where the requirement for a plan was replaced with the more comprehensive requirement for a "program" which is a defined term in Section 14.** **Also, the term "practices" is defined - see Section 14.**
63	4.1.1	It is unclear what is meant by "Program to incorporate". In addition, It is not clear what is "program" means here.	Consider rewording: "Program to conserve native biological diversity…" Consider: 1) clearly defining what a "program" is; 2) consistently applying the term and "program", and; 3) indicate that program participant must use adaptive management when implementing "programs" (if	**Comment addressed with edits to PM 4.1.** **The term program is defined in Section 14.**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
			not adaptive management is not included within the definitions of these terms).	
64	4.1.1 - 4.1.3	it is not clear what is "program" means here and it is not clear what the differences between "programs", "plans", and "practices" are.	Consider: 1) clearly defining what a "plan" is and what a "program" is; 2) consistently applying the terms "plan" and "program", and; 3) indicate that program participant must use adaptive management when implementing "plans" or "programs" (if not adaptive management is not included within the definitions of these terms).	**Comment addressed by edits throughout the Standard where the requirement for a plan was replaced with the more comprehensive requirement for a "program" which is a defined term in Section 14.** **Also, the term "practices" is defined - see Section 14.**
		Comments #65 - # 69 relate to requirements for addressing maintenance of soil productivity including the need for a definition of soil productivity and the need to mitigate erosion post-harvest.		
65	2.3.2	Standard should be clear that erosion needs to be mitigated.		**Comment addressed with edit to Indicator 2.3.6.**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
66	2.3	This Performance measure focuses on forest and soil productivity, with productivity defined as capacity to generate trees (The inherent capacity of a particular site or ecosystem to produce a crop or tree stand, often measured in volume or height). Healthy soils are critical for supporting many ecosystem services, of which producing trees is just one. Other roles include water storage and transport, supporting non-tree species, and storing carbon. Because the definition of 'productivity' provided in Section 13 is so tightly linked to producing a crop of trees, consider using a different term to modify 'soil' that addresses its other important roles. 'Soil productivity' is also used in several Indicators (2, 5, and 6), consider replacing with a broader term such as 'soil quality' or 'soil conservation' that promotes conservation of the range of values and services soils provide.	"Program Participants shall implement forest best management practices to protect and maintain forest productivity and soil quality." Soil quality could be included in Section 13, suggested definition "The continued capacity of soil to function as a vital living ecosystem that sustains plants, animals and humans. Soil quality is important for regulating water, sustaining plant and animal life, filtering potential pollutants, cycling nutrients, and physical stability and support."	**Comment addressed with new defined term "soil health" in Section 14 - Definitions**
67	2.3	Three different, but similar, terms are used in the performance measure and indicators - 'site productivity', 'forest productivity' and 'soil productivity'. The use of these three terms is inconsistent and not well defined, only productivity is defined. For example, 'forest productivity' is used in the performance measure, but is not used in any of the six indicators to support the measure. The lack of consistency and clarity in how these terms are used can create confusion for Program Participants. Providing separate definitions in the glossary and/ or minimizing the number of terms used in the Performance Measure and Indicators can reduce confusion.	If all three terms are necessary and distinct, include separate definitions in the glossary to clarify the terms. As per above comment, consider replacing 'soil productivity' with 'soil quality' to encompass all components of Objective 2 (i.e. carbon storage and conservation of forest resources).	**Comment addressed with edits to PM 2.3 and with the new defined term "soil health" in Section 14 - Definitions**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
68	2.3.6	Impacts to soils can be avoided or minimized throughout all stages of resource road and skid trail layout, construction and operation. Consider broadening this indicator to include these stages. By focusing this indicator on only road construction and skidding layout, Program Participants aren't required to consider avoidance and minimization opportunities at other stages.	Consider rewording: "Road planning, design, construction, operations, and decommissioning and skidding planning and operations to minimize impacts to soil quality."	**Comment addressed with edits to PM 2.3 and with the new defined term "soil health" in Section 14 - Definitions**
69	2.3.1	This indicator focuses on soils vulnerable to compaction; however, it would be more helpful for this process to be used to identify soils vulnerable to different types of disturbance, not just compaction. Compaction is one type of soil disturbance, vulnerability of soils to other disturbances such as rutting, and erosion can also be identified using similar methods. Soil disturbance is important to avoid and minimize because it can influence site productivity, water quality and other environmental factors. It is unclear what would be considered excessive disturbance to soil. Providing guidance on what constitutes 'excessive disturbance' is important because auditors will need a standard to assess relative to.	Consider : "Process to identify soils vulnerable to compaction, rutting, erosion, or other types of disturbance, and use of appropriate methods…" Suggest including an example of what would be considered excessive or including a definitions of 'excessive' in Section 13.	**Comment addressed with edits to PM 2.3 and with the new defined term "soil health" in Section 14 - Definitions**
		Comments #70 - #81 relate to requirements for the recognition & respect of Indigenous Peoples Rights.		

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
70	8.3	"The SFI 2015-2019 Forest Management Standard has added a new objective called "Recognize and Respect Indigenous Peoples Rights." This new objective reflects existing SFI forest management requirements regarding respect for Aboriginal and Tribal rights and values on public lands but now has enhanced provisions for private lands." How does a landowner put this into practice? Does a landowner's concern diminish IF he has no "indigenous" property owners adjoining his property? IF he does, is he expected to manage his property in "lock-step" to his neighbors? Again, with this verbiage, it is not understandable to the point where it becomes irrelevant to sustainable forestry practices.		**Comment addressed with edit to PM 8.1, 8.2 & 8.3.** **Also, definition of Indigenous Peoples in Section 14 has been updated with up to date links to federally recognized tribes (US) and First Nations (Canada)**
71	6.1.1	Indigenous peoples should also be consulted for information on special sites as stakeholders. Indigenous peoples have extensive landscape knowledge and areas of cultural significance as defined in what special sites are.	Consider: Ind. 6.1 "…..existing natural heritage data, expert advice, stakeholder consultation and consultation with Indigenous peoples in identifying or selecting special sites…".	**Comment addressed with edit to Indicator 6.1.1.**
72	8.2	Can we have Cultural Survival Areas Identified?		**Comment considered but not adopted. However, see edits to PM 8.2.**
73	8.2	Should Standard require the development of protocols and agreements with Indigenous communities?		**Comment addressed with edits to PM 8.2.**
74	8.1	Does this indicator require that Program Participants transmit this policy or otherwise publish it in any specific way?	Incorporate Interpretation	**Comment addressed with edits to PM 8.1.**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
75	8.2	PM 8.2 - the term "Confer" doesn't seem strong enough language as it does not oblige companies to consider, respect, protect, etc.		**Comment considered but not adopted. Term confer is considered the correct term in this context.**
76	8.2	PM 8.2 - who is the company supposed to consult or confer with?		**Comment addressed with edit to PM 8.1, 8.2 & 8.3.** **Also, definition of Indigenous Peoples in Section 14 has been updated with up to date links to federally recognized tribes (US) and First Nations (Canada)**
77	8.1	Would be an improvement if companies on public lands gave prior notification of SFI audits to First Nations with traditional territory in the scope of the FM audit.		**Comment addressed with edit to Indicator 8.2.1**
78	8.2	Staff and contractors would benefit from training in indigenous values and rights.		**Comment addressed with edit to Indicator 8.2.1.**
79	8.2	PM 8.2 and 8.3 require communications with affected Indigenous groups - what are culturally appropriate methodologies for engagement?		**SFI working with subject experts to develop the needed tools. Expectation is to have these available in Q4 2020.**
80	8.2	Inviting Indigenous groups for tours of forest operations could be an effective tool for building / improving relationships with the company.		**Comment addressed with edit to Indicator 8.2.1.**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
81	8.2	PM 8.2 refers to "Affected Indigenous Peoples" - need to clearly define the term "affected".		**Comment addressed with edit to PM 8.1, 8.2 & 8.3.** **Also, definition of Indigenous Peoples in Section 14 has been updated with up to date links to federally recognized tribes (US) and First Nations (Canada)**
		Comments # 82 - # 87 relate to climate change mitigation and adaptation and carbon footprint.		
82	1.1	Standard should require forest owners and managers to conduct an inventory of Green House Gas for their operations. This requires tools for collecting and reporting on GHG.		**Comment addressed with proposed Climate Smart Forestry Objective - Objective 9.**
83	1.1	Standard needs provisions for a climate change risk assessment & scenario analysis. Using these a company can develop a climate change adaptation & climate change mitigation plans.		**Comment addressed with proposed Climate Smart Forestry Objective - Objective 9.**
84	1.1	Use of available adaptation & mitigating tools. Understanding impacts of disturbance risks, Grow & Yield, etc. Sustainability includes future forest projections.		**Comment addressed with proposed Climate Smart Forestry Objective - Objective 9.**
85	1.1	Integrate climate specific assessment into long-term program planning for owned / managed lands.		**Comment addressed with proposed Climate Smart Forestry Objective - Objective 9.**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
86	10.3	Companies partner with NGOs, State / Provincial agencies and Educational Institutes to support research into climate change mitigation.		**Comment addressed with proposed Climate Smart Forestry Objective - Objective 9 and corresponding guidance.**
87	10.3	"broaden the awareness of climate change impacts on forests, wildlife and biological diversity." Disregarding any social or political implications "climate change" may have; there exists broad differences in the opinions in the greater forestry community whether climate change exists. Since the Chicago Climate Exchange became an extinct species a few years back, there must not have been any climate change effects that people were willing to pay for. Does the awareness of the effects of climate change go beyond what effects climate change assumptions are at this point? Creating awareness of a scientific phenomenon that may or may not exist (depending on which political scientific community that you happen to hail from) tends to make forest management seem irrelevant.		**Comment addressed with proposed Climate Smart Forestry Objective - Objective 9 and corresponding guidance.**
88	1. General	Scope needs to discuss how the SFI FM Standard aligns with the applicable UN Sustainable Development Goals.		**Document to be completed by Q4 2020.**
		Comments #89 - #91 relate to the need to address Urban Forests and the potential mitigation to climate change.		
89	1.1 Scope	Have urban forestry management module: Develop urban forestry working group to build recommendations. What's the role of food forests?		**Urban Forest task group to begin work in July 2020.** **SFI conducted Urban Forest webinar June 9th.**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
90	1.1 Scope	Role of urban forests and climate change- document benefits to communities		**Urban Forest task group to begin work in July 2020. SFI conducted Urban Forest webinar June 9th.**
91	2.4	Include/support ensuring urban forests are proactive for exotic species & Ensure food forests are protected from pests		**Urban Forest task group to begin work in July 2020.** **SFI conducted Urban Forest webinar June 9th.**
		Comments # 92 - # 110 relate to protection of water quality and water quantity.		
92	3.2	The term 'water bodies' is used in Objective 3 and its associated indicators without being defined. Without a definition it is unclear whether 'water bodies' includes wetlands.	See Section 13 comments for a suggested definition.	**Comment addressed with revised definition of "wetlands" in Section 14 - Definitions.**
93		Missing acknowledgement of water quantity as a key ecosystem service. Water quantity is equally as important as water quality and maintaining both water quality and quantity are important for providing the wide range of values that water resources support.	"These requirements include measures to protect water quality <u>and quantity</u>,…"	**Comment addressed with edits to Objectives 3, PM 3.1 and 3.2.**
94	Obj. 3	Objective 3 is the only Objective in the SFI Standard that addresses water resources; however, the Objective is focused only on water quality. Water quantity and ecological functions of water bodies (including wetlands) are not addressed in the standard. Maintaining water quantity and quality are both important for the effective protection and maintenance of water resources. Protecting and maintaining both water quantity and quality is directly linked to	Consider rewording : "To protect the water quality and quantity and maintain the ecological function of rivers, streams, lakes, wetlands, and other water bodies through meeting or exceeding widely accepted best management practices to avoid	**Comment addressed with edits to Objectives 3, PM 3.1 and 3.2.**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
		protecting and maintaining the ecological functions and services water bodies (inclusive of wetlands and temporary water features) provide. This objective and associated best management practices (Performance Indicator 3.1) should not be restricted to those which act to protect water quality alone. Other beneficial ecosystem services of water resources, most importantly the protection or maintenance of water quantity/ hydrologic function, should be included.	or minimize impacts to water quantity and quality, as well as other ecosystem services."	
95	3.1	The performance measure should be reworded to include water quantity and ecological function and/ or a new performance measure should be developed to address these issues. Companies are only required to meet government legislation or government approved best management practices. There is no room in the wording to encourage companies to develop their own best management practices (or source better practices from non-government sources). In addition, it is not clear what would be considered a Canadian approved water quality program – who would this need to be approved by? Also, the current wording of indicates Program participants shall meet best management practices - by definition are you able to exceed a best management practice? Maintaining water quantity and quality are both important for the effective protection and maintenance of water resources. Protecting and maintaining both water quantity and quality is directly linked to protecting and maintaining the ecological functions and services water bodies (inclusive of wetlands and temporary water features) provide.	Consider rewording: "Program Participants shall meet all or exceed applicable federal, provincial, state and local water quality laws, and implement best management practices developed to protect water quality, quantity, and ecological functions."	**Comment addressed with edits to Objectives 3, PM 3.1 and 3.2.**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
96	Principle 3	The Standard should bring end goals (ex. clean water for cities) into standards. This would help demonstrate the positive impacts SFI standard(s).		**Staff have reviewed and where appropriate updated with revisions to the SFI Forest Managements Principles. To be incorporate into the revised SFI Section 1.**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
97	3.2	Consider a program to manage the size and cumulative effects of clear-cuts in relation to the size of the surrounding first- or second-order watershed. Since clear-cut size is already limited, this might have minor application, but a proportional area limit such as 25% of the relevant watershed area for any individual clear-cut could indicate a direct attempt to have minimum impact on watershed stability and streamflow. The existing green up requirement creates a time delay between adjacent clear-cuts, but it could be extended by requiring that the green up requirement must be met before another clear-cut is done within the relevant watershed area.		**Comment considered but not adopted.**
98	3.2	Consider a program to plan, locate, and manage forest roads and their drainage features to minimize adverse impact on subsurface flows and limit direct channel connections to streams wherever possible.		**Comment addressed with edits to PM 3.2.**
99	3.2	The standard needs to address downstream water quality - downstream of the ownership or managed forest.		**Comment addressed with edits to PM 3.2.**
100	3.1	Currently no quantitative measures for water quality. How do we know if were achieving what we want?		**Comment considered but not adopted.**
101	3.2	Need to test BMPs to ensure they are effective.		**Comment considered but not adopted.**
102	3.1	Need consistency between state and provincial water quality monitoring program. System relies on the adequacy of existing water quality programs which are not guaranteed - SFI should track the adequacy of water quality monitoring.		**Comment considered but not adopted.**
103	3.2	How to measure water health - need quantitative measures		**Comment considered but not adopted.**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
104	3.1.1	We commend SFI for including monitoring BMPs as an indicator; however, this indicator would be strengthened by promoting more specific monitoring and adaptive management responses that requires Program Participants to improve on practices that might not result in positive environmental outcomes. Monitoring the implementation of BMPs is an important next step, but effective adaptive management requires Program Participants to act on the results of monitoring activities	Consider rewording: "Monitoring of best management practices implementation to ensure practices are effectively protecting water quality and quantity." "Demonstrate adaptive management, when practices are ineffective document problems and identify potential solutions, and alter practices." Or "Monitor BMP implementation, including identifying unanticipated environmental impacts which could trigger an adaptive management response."	**Comment addressed with edits to PM 3.1 and 3.2.**
105	3.2	Standard requirements need to recognize that response of streams to harvest is very dynamic. This needs to be taken into account in the BMPs without being too prescriptive.		**Comment addressed with edits to PM 3.1 and 3.2.**
106	3.2	Need to be sensitive that natural disasters that are out of the foresters hands can affect water quality.		**Comment addressed with edits to PM 3.1 and 3.2.**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
107	3.2	The Standard should consider a program to manage the size and cumulative effects of clear-cuts in relation to the size of the surrounding first- or second-order watershed. Since clear-cut size is already limited, this might have minor application, but a proportional area limit such as 25% of the relevant watershed area for any individual clear-cut could indicate a direct attempt to have minimum impact on watershed stability and streamflow. The existing green up requirement creates a time delay between adjacent clear-cuts, but it could be extended by requiring that the green up requirement must be met before another clear-cut is done within the relevant watershed area.		**Comment considered but not adopted.**
108	3.2	The Standard should consider a program to plan, locate, and manage forest roads and their drainage features to minimize adverse impact on subsurface flows and limit direct channel connections to streams wherever possible.		**Comment addressed with edits to PM 3.1 and 3.2.**
109	2.2.8	Wetlands are not included in this indicator. Like other water bodies (e.g., streams and lakes) mentioned in this indicator, wetlands and wetland associated species are sensitive. As well, wetlands are often hydrologically connected so chemicals that enter a wetland can be transported beyond the location of entry. Recommend that wetlands be added to this indicator or that wetlands are included in a definition of water bodies and indicate that the use of chemicals in or near streams, lakes, water bodies and wetlands should be avoided.	Consider alternate wording: "avoid chemical use in streams, lakes, water bodies and wetlands, monitor water quality, and apply safeguards to ensure proper equipment use when working near these features."	**Comment considered but not adopted. PM 2.2 addresses wetlands (aquatic habitats).**
110	3.2	Standard should allow for more variation in stream buffer widths with justification (e.g. 20m vs 30m buffer based on available research).		**Comment considered but not adopted.**
		Comments # 111 - #115 relate to Standard requirements for forest management planning.		
111	1.1	Standard should address spatially explicit modeling in forest management planning.		**Comment considered but not adopted.**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
112	1.1	Does the forest management planning cycle (Objective 1) and continual improvement requirements (Objective 15) require identification and mitigation of potential negative impacts of management practices?	Incorporate the interpretation.	**Comment addressed with interpretation in PM 1.1.**
113	1.1	Should the standard address satellite imagery for monitoring of forestry practices?		**Comment considered and Task Group decided to no include in the list at Indicator 1.1.1 as this list is illustrative and it would not be practical to list all tools available to a forest manager.**
114	1.1	Does the Standard require the monitoring of revisions to forest management plans?		**Comment considered but not adopted.**
115	1.1	We need to critically reassess our reference to some of these NGOs (CI, WRI, etc.) ensuring that we know their orientation and focus areas moving forward so that we do not negatively impact our PPs. We need research the mission, values of the organizations cited the Standard to ensure that these organizations are still compatible with those of SFI Inc.		**Staff have reviewed and are satisfied that the values of the organizations cited in the Standard align with those of SFI.**
		Comments #116 - # 118 relate to Standard requirements for control of invasive species.		

SFI Standards Revision Public Comments

October-November 2019 Public Comment Period   **Section 2: Forest Management**   **SFI Review Task Force Recommendations**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
116	2.1	PM 2.1 - add restoration of native species after eradication of invasives.		**Revised text in Performance Measure 2.4 considered to address the comment: Ind. 2.4.2** *Management to promote healthy and productive forest conditions to minimize reduce susceptibility to damaging agents.*
117	2.4	The standard should require that the eradication of invasive plants should be followed with the concerted restoration of native cover crops / understory vegetation to mitigate reoccurrence.		**Revised text in Performance Measure 2.4 considered to address the comment: Ind. 2.4.2** *Management to promote healthy and productive forest conditions to minimize reduce susceptibility to damaging agents.*

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
118	2.4	Does the Standard need an additional indicator for invasive species? "Take proactive and preventative measures to reduce the spread of invasive, exotic species (especially plants)".		**Comment addressed with revised definition of "invasive species" to replace the former definition of** *invasive exotic plants and animals.* **See definition in Section 14 - Definitions.**
		Comments #119 - #121 relate standard requirements for regeneration timelines.		
119	2.1.1	According to forest composition and/or the intensity of the sylvicultural scenario, a delay of 5 years could be insufficient to cover all cases of reforestation by planned natural regeneration methods. For example, with extensive sylvicultural scenarios, where the target composition is softwood (Fir-Spruce-Pine-Larch) and when deciduous tree competition is not an issue, the delay could reach up to 10 years.	Documented reforestation plans, including designation of all harvest areas for either natural, planted or direct seeded regeneration and prompt reforestation, unless delayed for site-specific environmental or forest health considerations or legal requirements, through planting within two years or two planting seasons, or by planned natural regeneration methods within ten years.	**Comment considered but not adopted.**
120	2.1.1	Regeneration timeline in current standard may not be feasible for all forest types in N Am. "Prompt" may take longer that 5 years. Is there a way to create an exception in circumstances where the best available science suggests natural regeneration at longer intervals.		**Comment considered but not adopted.**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
121	2.1.5	It is not clear why program participants must develop a reforestation plan but develop an afforestation program, what is the difference between plans and programs? It is not clear if the plans and programs developed are required to be implemented, monitored, evaluated and adapted.	Consider: 1) clearly defining what a "plan" is and what a "program" is; 2) consistently applying the terms "plan" and "program", and; 3) indicating that program participant must use adaptive management when implementing "plans" or "programs" (if adaptive management is not included within the definitions of these terms).	**Comment addressed with edit to Indicator 2.1.5.** **Also, a new definition of afforestation has been adopted - see Section 14 - Definitions.**
		Comments #122 - #126 relate to standard requirements for research.		
122	**Obj 10**	Forestry Research, Science and Technology – because of the important connections between forests and the areas that surround them (e.g., forest-water connections) suggest including investing in forestry research that supports this type of information (related to productivity, water quality, biodiversity, etc.)	It may be hard to add this to the wording of the objective but suggestion for wording of Performance Measure 10.1, indicator 1 "…Examples could include, but are not limited to, areas of forest productivity, water quality, biodiversity, *connections between forests and surrounding ecosystems,* community issues..."	**Comment addressed with edits to PM 11.1**
123	12.1	Standard needs to engage with students who are the industry's future employees.		**Comment addressed with edit to PM 13.2.**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
124	Obj 10	This objective and associated performance measures/indicators do not foster adaptive environmental management whereby the results of research and monitoring efforts are incorporated into future forest management planning and best management practice development to improve the protection of non-timber forest values. It would be beneficial to provide a feedback loop mechanism in which results of the research could be shared with SFI and other program participants and which could also help inform future revisions of the SFI Standard. Perhaps there should be a requirement to share this information; however, this would mean SFI would need to provide the mechanism for sharing.		**Comment addressed with edit to PM 10.1.**
125	10.1	Standard should support research and its application that are driven by need and taken up by forest managers.		**Comment addressed with edit to PM 10.1.**
126	10.1	Standard should promote Interdisciplinary research partnerships and collaboration. Also, 3rd party research aids SFI credibility.		**Comment addressed with edit to PM 10.1.**
		Comments # 127 - # 130 relate to forest health and fire.		
127	2.1.3	As currently worded, this statement is unclear and reads like a best management practice. Currently the statement seems to indicate that planting exotic tree species aids in minimizing a risk to native ecosystems.	Recommend rewording the statement to provide clarity (e.g., "Exotic tree species should be planted in a manner that minimizes risk to native ecosystems" or "Exotic tree species should *be used only when the risk to native ecosystems is minimal"*)	**Comment addressed with edit to Indicator 2.1.3.**
128	2.2	To what degree are forest managers given discretion to employ techniques to manage damaging agents based on the dynamics of their specific geography and the characteristics of that specific landscape?		**Comment considered but not adopted.**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
129	2.1.4	Proposed new Indicator at 2.1.4	new text - Protection of desirable or planned advanced natural regeneration during harvesting a*nd prescribed burning*.	**Comment considered but not adopted.**
130	2.4	As the boreal forest is naturally evolving with fire and pest cycles, keep an open management approach that allows harvest operations to imitate those cycles preventing fires from occurring on a larger area.		**Comment considered but not adopted.**
		Comments # 131 - #132 relate to protection of Special Sites.		
131	6.1	• There is no requirement to protect special sites as there is in other objectives relating to soil and water. Management does not guarantee the sites won't be damaged. • There is no requirement to protect/ manage all special sites leaving the door open to pick and choose which sites to protect. • There is no guidance as to what may constitute an ecological special site, a geological special site, or a culturally important special site. Examples should be provided as part of the definition. • The objective does not define what "manage in manner appropriate" and does not require effective management or protection, There is no requirement for monitoring to insure they are protected.	Consider rewording: "Program participants shall identify special sites and develop a management plan to protect special sites from destruction or damage. Management plans should consider the unique features of special sites."	**Comment addressed with edits to PM 6.1.**
132	6.1	New Indicator for special places protection.	Consider new indicator: "Develop, implement, and monitor a program to protect special sites from destruction or damage due to forest management activities. Results of monitoring should be used to	**Comment addressed with edits to PM 6.1.**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
			assess the effectiveness of protection measures."	
		Comments #133 - #136 relate to legality and legal requirements.		
133	9.1	Regional legal requirements included in standards		**Comment considered but not adopted.**
134	9.1	Crosswalk to EU/Lacey Regulations: Referenced or in standard? Optional indicators? Show how standards help EUTR/Lacey? Where is SFI meeting other sourcing requirements.		**Comment addressed with new definition of "local" when used in a legal context. See Section 14 - Definitions.**
135	9.2	Provide national/state level details of legal aspects applicable to all certificate holders in that area.		**Comment considered but not adopted.**
136	9.2	call out gender equality specifically. Recommended language in red following PEFC discussions on same topic in related standards.	PM 9.2 Indicator 1. Written *policy* demonstrating commitment to comply with social laws, such as those covering civil rights, equal employment opportunities including the promotion of gender equality, anti-discrimination and anti-harassment measures, workers' compensation, *Indigenous Peoples'* rights, workers' and communities' right to know, prevailing wages, workers' right to organize, and occupational health and safety.	**Comment addressed with edit to PM 10.2.**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
137	Section 13	The phrase 'Protect and Maintain' is used in a few of the Objectives and in a several Performance Measures and Indicators. However, the distinction between the terms 'Protect' and 'Maintain' is unclear. 'Protection' is defined in Section 13 as 'Maintenance of the status or integrity over the long-term…'. Maintain is not defined in Section 13 and it is unclear how the definition would differ from that of Protection.	Recommend considering if both terms are necessary. If both terms are to be included, recommend defining 'Maintain' in Section 13 so that it is clear to Program Participants how it is different from 'Protect'.	**Comment addressed with revised definition for "protection" - see Section 14 - Definition.**
138	12.2	Education/outreach to marginalized communities and younger school children		**Comment addressed with edit to PM 13.2.**
139	Objectives	The wording of some Objectives (i.e., Objectives 2, 3, 4, 11, 15) includes both outcomes to be achieved and mechanisms (practices) to be employed. Other Objectives state only the outcomes.	Consider using consistently language for the wording of each objective; either only state the outcomes or include both outcomes and mechanisms.	**Staff have reviewed and where appropriate updated with revisions to the SFI Forest Managements Objectives.**
140	12.1	Survey of SFI network participants to identify urban partnerships (i.e. biomass)		**Urban Forest task group to begin work in July 2020.** **SFI conducted Urban Forest webinar June 9th.**
141	12.2	Provide local forest education for communities		**Comment addressed with edit to PM 13.2.**
142	12.2	education/outreach to local government on responsible SFM		**Comment addressed with edit to PM 13.2.**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
		Comments #1 - #4 relate to Standard requirements for increasing the role of FECV throughout the entire fiber procurement chain.		
1	1.1	Standard should place more emphasis on Forest with Exceptional Conservation Value (FECV) in fiber sourcing.		**Comment addressed with new Performance Measure 1.2.**
2	1.1	Should not be restricted to purchase stumpage only. All harvest types would include all wood producers and wood dealers		**Comment addressed with a new PM 1.2.**
3	1.1	Indicator 1.1.2 should be revised to read: Program to address FECV values in harvests of all types		**Comment addressed with a new PM 1.2.**
4	1.1.b	Add notes to this section that if someone else does a regional assessment that it can be used in place of the program participant doing this.	Add note to standard to allow for flexibility in using other resources to meet this.	**Comment addressed with a new PM 1.2.**
		Comments #5- #6 relate to Standard requirements for water quality Best Management Practices across the entire procurement network and verifiable monitoring system for water quality BMPs.		
5	2.1	Rewrite standards to include BMPs compliance for all procured wood. Not just current language about stumpage.		**Comment considered but not adopted.**
6	2.2	There are instances where the states already have a verifiable monitoring system and SFI has a hotline. The wording in this section should be made more clear that in instances where that is happening what the program participants are allowed to do.		**Comment addressed by edits to PM 2.2.**
		Comments #7- #15 relate to Standard requirements for training of Qualified Logging Professionals (and Qualified Resource Professional)		
7	6.1	Revise the Qualified Logging Professional (QLP) definition to require more than one person trained on site.		**Comment addressed by edits to PM 6.1 and PM 6.3.**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
8	6.1	Clarify the QLP definition to state more than 1 trained person per crew is needed.		**Comment addressed by edits to PM 6.1 and PM 6.3.**
9	6.1	Standard should state we require more than 1 logger/crew to be trained. Also, we need awareness of the rest of the crew to be better.		**Comment addressed by edits to PM 6.1 and PM 6.3.**
10	6.1	Standard should clarify what constitutes "on site regularly"?		**Comment addressed by edits to PM 6.1 and PM 6.3 and Guidance in Section - Guidance.**
11	6.1	"Must strive to have a trained logger on the job" don't need to specify 100% but imply		**Comment addressed by edits to PM 6.1 and PM 6.3 and Guidance in Section - Guidance.**
12	6.1	Standard should clarify whether it is the company or the logger that is trained in order for that crew to be considered a trained.		**Comment addressed by definition of "Qualified Logging Professional" and new definition for "Certified Logging Company".**
13	6.1	QLP definition: Crew or person trained? Clarify which one.		**Comment addressed by definition of "Qualified Logging Professional" and new definition for "Certified Logging Company".**
14	6.1	Clarify that trained logger refers to the individual operation supervisor. This individual must be listed as the trained logger on an available web site listing other trained loggers in the individual company.		**Comment addressed by definition of "Qualified Logging Professional" and new definition for**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
				"Certified Logging Company".
15	6.1	Should training for other in-woods service contractors (tree planters, road prep, etc.) be based on their activities and potential for risk the resources?		**Comment considered but not adopted.**
	Comments #16- #19 relate to Standard requirements for Certified Logging Professionals.			
16	6.3	Standard should do away with the certified logger - the number of states with certified loggers has not increased in 10 years.		**Comment considered but not adopted.**
17	6.3	Don't want "certified logger" in the standard.		**Comment considered but not adopted.**
18	6.3	Addition of certified logger in the standard has diluted emphasis on education. Gives the impression that if you are certified then you do not need ongoing education.		**Comment considered but not adopted.**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
19	6.1	As you are aware, timber operations on private lands in California are subject to a very comprehensive and stringent set of Forest Practice Rules (CFPRs). The California SIC encourages SFI, during the Standard Revision Process, to consider logging professionals in states like California that must acquire and maintain a Timber Operators License (LTO) to be Certified Logging Professionals. LTOs are subject to all of the CFPRs when they are conducting harvest activities and are subject to enforcement actions if they violate any of those rules. LTOs participate in annual training and are subject to extensive mandated oversight of their timber operations both by licensed foresters representing landowners as well as foresters employed by the State of California (CAL FIRE) to enforce the CFPRs and therefore receive 3rd party evaluations on a frequent basis throughout the work season.		**Comment considered but not adopted.**
		Comments #20 - # 41 relate to requirements for i) quality of SIC approved training (core and continuing ed.), ii) need for consistency of training between jurisdictions & iii) need for an online trained logger database.		
20	6.2	BMP implementation - are we adequately reaching loggers and foresters with guidance in BMP implementation?		**Comment addressed with PM 6.1, PM 6.2 and PM 6.3 which clarify the need for core and continuing education requirements for logger training.**
21	6.2	Control the cost of training for loggers- some charge tuition, some require association membership, some are no cost.		**Comment considered but not adopted. Cost of training is controlled by**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
				the SIC and outside of the scope of the Standard.
22	6.2	Allow only hands-on training not online training.		**Comment considered but not adopted. Cost of training is controlled by the SIC and outside of the scope of the Standard.**
23	6.2	Focus exclusively on training to operator impacts "on the ground".		**Comment considered but not adopted. Cost of training is controlled by the SIC and outside of the scope of the Standard.**
24	6.2	Only have face to face core training		**Comment considered but not adopted. Cost of training is controlled by the SIC and outside of the scope of the Standard.**
25	6.2	Differentiation between logging roles in training		**Comment considered but not adopted. The standard at 6.1.4 currently allows for differentiation in training depending on the in-woods responsibilities of the person.**
26	6.2	Specify in the standard the core training and continuing education requirements.		**Comment addressed with PM 6.1, PM 6.2 and PM 6.3 which clarify the need for core and continuing education requirements for logger training.**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
27	6.2	Develop a program that works with wood producers to provide information utilizing Nature Serve data.		**Comment considered but not adopted. Standard addresses already at 6.2.1 e.**
28	6.2	Standard needs more emphasis on emerging technologies for QLP training.		**Comment considered but not adopted. Standard addresses already at 6.2.1 e.**
29	6.2	Core training- state specific		**Comment considered but not adopted.**
30	6.2	Better consistency of training between SICs would allow reciprocity for QLPs across state borders.		**Comment addressed with PM 6.1, PM 6.2 and PM 6.3 which clarify the need for core and continuing education requirements for logger training.**
31	6.2	Make training curriculum available to public online		**Done using SIC listserv.**
32	3.1	trained loggers database should be public, online and available in real time		**Done using SIC listserv.**
33	3.1	SFI manages a national trained logger database		**Staff have determined that a national database of trained loggers is not feasible at this point in time. Could be revisited at a later date.**
34	6.2	Consistency among SFI SIC training programs: Curriculum for core and continuing ed, access to training in person and online (Also, Canada PPs do training and need materials).		**Comment addressed with PM 6.1, PM 6.2 and PM 6.3 which clarify the need for core and continuing education requirements for logger training.**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
35	6.2	More consistency with specificity of logger training topics.		**Comment addressed with PM 6.1, PM 6.2 and PM 6.3 which clarify the need for core and continuing education requirements for logger training.**
36	6.2	We need more/better data on logger training effectiveness.		**Comment addressed with edit to PM 6.2.**
37	6.2	Continued education is not consistent across SICs - standard should address this.		**Comment addressed with edits to PM 6.2.**
38	6.2	Logger training effectiveness should be measured.		**Comment addressed with edits to PM 6.2.**
39	6.2	Define what constitutes continuing education (frequency) and the role of the SIC. Is it best addressed with a Standard revision change or SIC governance change?		**Comment addressed with edits to PM 6.2.**
40	6.2	How can SICs be used for enhancing promotion of biodiversity for small landowners and how awareness of biodiversity can be further enhanced via logger training?		**Comment addressed with edits to PM 6.2.**
41	6.2	Should SICs look at means of managing workforce recruitment/outreach/		**Comment considered but not adopted. Decided this is beyond the scope of the Standard.**
42	2.1	I don't think that the inventory wording is needed anymore. This is just about adherence to BMP's in the field and monitoring these. It doesn't add value to the standard.	remove inventory wording in performance measure 2.1. Remove line in 2.1 part 3 "program to address adverse weather conditions. This section needs to either be removed or talk about a risk based approach to	**Comment considered but not adopted.**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
			addressing BMP compliance. This section should only be about compliance and monitoring.	
	Comments #43 - #46 relate to comments regarding the Scope of the Fiber Sourcing Standard.			
43	1. General	Scope needs to discuss how the SFI FS Standard aligns with the applicable UN Sustainable Development Goals.		**Document to be completed by Q4 2020.**
44	1.1 Scope	This section states: "The SFI 2015-2019 Fiber Sourcing Standard applies to any organization with a fiber sourcing program that acquires roundwood and field manufactured or primary-mill residual chips, pulp and veneer to support a forest products facility." It may be helpful if the wording is changed in order to embrace other than roundwood, field manufactured or primary-mill residual chips, pulp and veneer to support a forest products facility.	The SFI 2015-2019 Fiber Sourcing Standard applies to any organization with a fiber sourcing program that acquires roundwood and field manufactured or primary-mill residual chips, pulp and veneer to support a forest products facility OR, IN PART, TO THOSE ORGANIZATIONS THAT SOLELY INTEND TO SOURCE, MANUFACTURE (IF APPLICABLE) AND SELL SFI CERTIFIED SOURCING MATERIAL .	**Comment considered but not adopted.**
45	Scope	If my company does not own a manufacturing facility, does not remanufacture round wood (saw-logs, pulp wood) but we do purchase certified and non-certified round wood for re-sale are we required to be certified to the SFI 2015-2019 Fiber Sourcing Standard? We do not intend to make any SFI claims for the non-SFI certified logs we resell.		**Interpretation incorporated into Standard.**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
46	Scope	My organization manages forestland and has manufacturing facilities & we source all of our primary sources from forests certified to the SFI, CSA or ATFS Standards. Are my mills still required to be certified to the SFI 2015-2019 Fiber Sourcing Standard?		**Interpretation incorporated into Standard.**
47	4.2	Regional legal requirements to be part of Program.		**Canadian inventory of legal requirements for forest management completed. US inventory is ongoing.**
48	Principle 12	The standards working group should revisit what the public report requirements are and what ability their is to add to public reporting requirements to add transparency to the standard.	Revisit public reporting requirements within working group.	**Section 11 edited to include the requirement that a summary of the FECV assessment by included in the Public Audit Summary.**
49	10.1	The management review requirements are overly lengthy and should be revised to a single item. A system for reporting does not need documented. This is overly excessive.	Remove all three lines of 10.1 and change to "certificate holder to review their fiber sourcing program on an annual basis with top management including internal audits and changes to any monitoring items.	**Comment considered but not adopted.**
50	Principle 13	Should continual improvement be part of these standards or does it have a place in a risk management standard. I am wondering if this needs revisited.	This sends a message that things improve and there are no metrics tied with it. Unless there are going to be metrics tied to this it should be removed as a principle especially if this is about risk mitigation.	**Staff have reviewed and where appropriate updated with revisions to the SFI Fiber Sourcing Principles. To be incorporate into the revised SFI Section 1.**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
51	All Sections	Section 3 is missing requirements for Central Office functions for multi-site and group certificates. It is unclear what the certification body should be verifying at the central office level.		**Multi-site and group certification requirements are in Section 10.**
52	All Sections	Include an Appendix that states Certificate Requirement (i.e. copy Appendix 2 of CoC Standard).		**Certificate requirements moved in Section 10.**
53	5.1.1	Right now these are points that are both audited and also reported on. Do they need to be audited on site or should the data reporting be removed from the audit section and made it's own item? I think that de-coupling the reporting may be needed. Also is there a value to auditing this every year?	Is there opportunity to reduce efforts here and better target the datasets.	**Process is ongoing. To be concluded before next reporting period Certified Organizations for the SFI annual Progress Report in Q1 2021.**
*	5.1.1	The USFS Forest Inventory and Analysis (FIA) program includes three components: (1) the collection of forest inventory data from field plots, (2) survey collection of roundwood production data through the Timber Products Output (TPO) program, and (3) collection of data about private landowner demographics and intentions through the National Woodland Owner Survey (NWOS).	"In-kind support through sharing of information with the USFS Research and Development Forest Inventory and Analysis (FIA) program. Examples could include, but are not limited to, cooperation with voluntary surveys such as the Timber Products Output survey and the National Woodland Owner survey."	**Comment addressed with edits to PM 5.1.**
**	7.1.2	Proposing an additional example (i) for PM 7.1.2, (Community Involvement and Landowner Outreach):	"2. Support, individually or collaboratively, education and outreach to forest landowners describing the importance of and providing implementation guidance on: " i. cooperation with research and data collection programs like FIA and TPO that	**Comment addressed with edit to Indicator 7.1.3.**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
			require public cooperation (e.g., access to land for taking plots, responding to surveys, etc.);"	
***		Guidance para 14 - SICs in Section 6.		**This is still in process. Could involve potential revisions to the SFI Implementation Committee governance documents. This is beyond the scope of the Standards revision process so not possible to assign a firm timeline.**
54	6.1	The wording has the standard being named. The commitment should be to the program participant meeting the SFI Fiber Sourcing. Not the 2015-2019. This causes unnecessary updates of documents that should not include the full wording.		**Name of Standards have been edited to remove standard application period.**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
		Comments #1 - #8 relate to moving Fiber Sourcing Standard Appendix 1 to the COC Standard.		
1	**1.1 Scope / Appendix 1: Rules for Use of SFI Certified Sourcing Label**	Remove Certified Sourcing from the Fiber Sourcing Section	Create a separate section for Certified Sourcing.	**Comment addressed with draft Certified Sourcing Standard.**
2	**1.1 Scope / Appendix 1: Rules for Use of SFI Certified Sourcing Label**	Programmatically can appendix one be moved to the CoC section 4? If remote audits are allowed for non complex sites does having a stand alone appendix make sense?	Can these areas be combined so that a customer type stakeholder only has to look in one area to understand the need and design of their policy? Suggest moving to section 4 and moving trademark items to trademark standard.	**Comment addressed with draft Certified Sourcing Standard.**
3	**1.1 Scope / Appendix 1: Rules for Use of SFI Certified**	Appendix should be moved into CoC standard. Fiber Sourcing Standard should focus on procurement.		**Comment addressed with draft Certified Sourcing Standard.**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
	Sourcing Label			
4	**1.1 Scope / Appendix 1: Rules for Use of SFI Certified Sourcing Label**	Appendix 1 Parts 6 and 7 have lots of similarity to Parts 4 and 5 of Chain of Custody. Why not move Appendix 1 into CoC?		**Comments 1-8 in this workbook addressed in the Section 3 SFI Fiber Sourcing Standard Appendix 1 worksheet.**
5	**1.1 Scope / Appendix 1: Rules for Use of SFI Certified Sourcing Label**	Reduce redundancy between Fiber Sourcing & CoC Standard by separating out the DDS elements that exist in both standards into a separate appendix, focused on those that are known to be risks in North America. Reduce redundancy by moving definitions out of these sections and into the Definitions section. Also reduce redundancy and make a clearer/strong tie between objective 4 and the definition of controversial sources (which currently all stems back to legality thus it is already addressed by conformance to Objective 4). Combine the identification of controversial sources with the risk mitigation.		**Comments addressed with draft Certified Sourcing Standard.**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
6	**1.1 Scope / Appendix 1: Rules for Use of SFI Certified Sourcing Label**	SFI should highlight the intent of Annex 1 publicly. Why is it needed. May not be needed in the future.	SFI to be more public on standards use intent	**Comment addressed with draft Certified Sourcing Standard.**
7	**1.1 Scope / Appendix 1: Rules for Use of SFI Certified Sourcing Label**	Merge the CoC standards, Certified Sourcing (SFI Section 3, Appendix 1) and Multi-site Requirements SFI Section 9, Appendix 1) into one section		**Comment addressed with draft Certified Sourcing Standard.**
8	**1.1 Scope / Appendix 1: Rules for Use of SFI Certified Sourcing Label**	Move Appendix 1 of Fiber Sourcing into CoC Standard		**Comment addressed with draft Certified Sourcing Standard.**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
		Comments #9 - #16 relate to i) the Scope of the SFI CoC Standard and ii) degree of alignment with the PEFC CoC Standard.		
9	Scope 1.1	Address in the Scope section text in Section 6, 14.3 Exemption from SFI CoC		**Interpretation incorporated into the Standard in the Scope section.**
10	Scope 1.1	PEFC recognition of the SFI CoC Standard?		**Comment addressed with numerous edits to align the Standard with PEFC CoC Standard.**
11	Scope 1.1	Treat Brokers in the same way that PEFC CoC does.		**Comment addressed with edit in Scope section.**
12	Scope 1.1	Address in Scope section the text in SFI Section 6, 14.6 Scoping in Suppliers into a CoC		**This item remains in the Guidance section - was not moved into the Standard.**
13	1.2	Are organizations certified to SFI Chain of Custody Standard required to demonstrate compliance with all applicable social laws at the federal, provincial, state and local levels in the country in which they operate?		**Interpretation incorporated into the Standard in 8.2.**
14	1.1	Clarify that loggers do not need CoC and how that needs to be documented		**Comment addressed with edit in Scope section.**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
15	2.2 / 3.3	Clarify how claims from SFI certified forests can pass through uncertified suppliers to CoC mills.		**Comment considered but not adopted.**
16	2.2.2	It may be a good idea to state SFI's website link for the database here: http://www.sfidatabase.org/PublicSearch/MainSearch.aspx		**SFI Certificate database is easily accessed via the SFI website. Currently no plan to include the link in the Standard.**
	Comments #17 - #26 relate to the requirement for risk assessment.			
17	4	Develop SFI regional / national risk assessment process that reflects a harmonization of competing approaches and improves efficiencies and credibility.		**Comment addressed with revised definition of Controversial Sources and expanded requirements for Due Diligence System.**
18	4	There could be an additional note stating something like that those companies that are solely sourcing already SFI-certified input as per 2.2.1 are not required to apply Part 4.		**Comment addressed with revised definition of Controversial Sources and expanded requirements for Due Diligence System.**
19	4.3	Section 4.3.2 requires a risk assessment of sourcing forest-based products from illegal logging. Are there guidelines that would indicate what kind of risk assessment is necessary for an appropriate assessment of risk?		**Comment addressed with revised definition of Controversial Sources and expanded requirements for Due Diligence System.**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
20	4.3	4.3.2 should be expanded to include specific evidence of due care systems. For example, legality evidence, transportation documents, import declarations.		**Comment addressed with revised definition of Controversial Sources and expanded requirements for Due Diligence System.**
21	4.3	Review and incorporate into 4.3 the text at Section 6, 14.5 Controversial Sources and De Minimis Amount		**Comment addressed with revised definition of Controversial Sources and expanded requirements for Due Diligence System.**
22	4	Exempt recycled content from DDS - impossible to trace origins.		**Comment addressed in the Standard at 7.2.2.**
23	4.3.1	Do we need to have a reference to inputs form CITES habitat in the due diligence in COC standard? Is it a benefit?		**Comment addressed with revised definition of Controversial Sources and expanded requirements for Due Diligence System.**
24	4	Should DDS make a reference to the ILO?		**Comment addressed with revised definition of Controversial Sources and expanded requirements for Due Diligence System.**
25	4	Can we have blanket declarations for low risk of certain elements that are not issues in N. AM. And only include items that do not represent protected sites.		**Comment addressed with revised definition of Controversial Sources and expanded**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
				requirements for Due Diligence System.
*	4.2	Increasingly Global Standards are using the IUCN Red List and CITES as the basis for species of concern - Should SFI consider doing the same?		**Decision made to retain references to the Endangered Species Act definitions for threatened and endangered species as these are legally defined whereas the IUCN lists do not have legal status in US.**
26	4.4	Is a signed contract and/or self-declaration sufficient to mitigate risks identified through the due diligence system?		**Comment addressed with revised definition of Controversial Sources and expanded requirements for Due Diligence System.**
	Comments #27 - #36 relate to requirements for materials from conversion sources.			
27	4.1	Enable wise utilization of fiber from necessary conversion (pipeline) and recognize forestry is not the cause of a majority of conversion.		**Comment addressed with revised definition of Controversial Sources and expanded requirements for Due Diligence System.**
28	4.1	Legality: Keep as is especially regarding conversion and biodiversity, OR go beyond legal requirements		**Comment addressed with revised definition of Controversial Sources**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
				and expanded requirements for Due Diligence System.
29	4.1	Conversion: Currently SFI has a much different view than PEFC on Conversion. How important is endorsement of SFI by PEFC? I'm in favor of leaving SFI stance on conversion alone, if it is acceptable to PEFC.		**Comment addressed with revised definition of Controversial Sources and expanded requirements for Due Diligence System.**
30	4.1	Fiber outside of North America needs better definition (possibly beyond reliance on legality) and consistency.		**Comment addressed with revised definition of Controversial Sources and expanded requirements for Due Diligence System.**
31	4.1	Sourcing fiber and only focusing on legality is a risk to SFI brand.		**Comment addressed with revised definition of Controversial Sources and expanded requirements for Due Diligence System.**
32	4.1	Keep conversion related to "legal" issues around conversion.		**Comment addressed with revised definition of Controversial Sources and expanded requirements for Due Diligence System.**
33	4.1	Consider looking beyond a strict definition of controversial sources based solely on legal compliance.		**Comment addressed with revised definition of Controversial Sources and expanded**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
				requirements for Due Diligence System.
34	4.1	Move from legal to beyond legal with controversial sources.		**Comment addressed with revised definition of Controversial Sources and expanded requirements for Due Diligence System.**
35	4.1	Where do we stand on the legal and limited conversion? Positive lens on utilizing wood generated for public use and states the use of it is not the driver.		**Comment addressed with revised definition of Controversial Sources and expanded requirements for Due Diligence System.**
36	4.1 / 4.3	Eliminate redundancy between 4.1 and 4.3		**Comment addressed with revised definition of Controversial Sources and expanded requirements for Due Diligence System.**
	Comments #37 - #47 relate to requirements for labels and claims.			

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
37	2.2 / 3.3	I think that the claims needs to be made more clear and in a single section of the standards to give the standard a customer focus. The claims also need to be streamlined and shortened as much as possible.		**Comment addressed with edits (matrix) in draft 2022 Section 6 - Rules for Use of SFI Labels and Marks.**
38	2.4.2	Remove having to make CoC claims between facilities of same company		**Comment addressed with edits in part 4.1.**
39	2.4.2	Add an a new claim as 2.4.2 vii. "100% from a SFI certified forest".		**Comment addressed with edits in part 4.1.**
40	2.4.3	Non-timber forest products: Add a new clause 2.4.4 "If the organization uses the SFI on-product label on a non-timber forest product the label at 2.4.2 d) vii. shall be used".		**Comment addressed with edits in part 4.1.**
41	2.2. / 3.3	This section may want to illustrate the peculiarity of SFI X% Certified Sourcing and difference to SFI X% Certified Content. That is one aspect secondary manufacturers often get confused about.		**Comment addressed with edits in part 4.1.**
42	2.2 / SFI Section 5	full acceptance of PEFC fiber for SFI claims		**Comment addressed in 3.5.1.**
43	2.2	Provide optional item to allow SFI Fiber Sourcing claim be placed on documents to start a chain and communicate fiber sourcing in conventional ways to customers.	Add new standard item with "optional" so that it is not compulsory.	**Comment addressed by edits in Part 5 of the Standard.**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
44	2.2	Unclear if the 2/3 fiber requirement coming from certified sourcing can include CoC-certified inputs under any credible standard (FSC, SFI, ATFS, PEFC). Given that CoC is a higher claim, this should meet the eligibility requirements. Common understanding is no - that it needs to be direct from the forest and/or sold with a Certified Sourcing claim to the secondary producer. As written, a mill that procured only purchased pulp with a mixture of SFI Volume Credit and FSC Mix Credit claims on all inputs, is not eligible to use the Certified Sourcing label, even if they are part of a multi-site SFI CoC certificate and doing so would create efficiencies in labeling for them and their customers. This seems a bit contradictory to the last sentence in 3.4 which recognizes fiber from an acceptable forest management standard as eligible inputs to a certified sourcing claim.		**Comment considered but not adopted. 2/3 must meet definition of Certified Sourcing - FSC CoC does not meet this definition.**
45	2.2.1	2.2.1 d ii. refers to SFI Certified Sourcing, but 2.4.2 v. refers to SFI X% Certified Sourcing. Unless there are other compelling reasons, it may be better to state SFI X% Certified Sourcing in both cases (more consistent) or even state both options, AND in both cases.		**Comment addressed with edits to 4.1.**
46	2.2. / 3.3	Need to address the scenario where the Primary producer makes a product which is 100% certified sourcing but is an interim product (e.g. bleach board). Product is going to be converted by the customer to another product and all trace of the label is lost. Does it make sense for the producer of the interim product to label for Certified Sourcing?		**Comment addressed in Section 6 - Rules for Use of SFI Labels and Marks.**
47	2.2	Have an option for CS label on products if the product is manufactured by a facility holding CoC and not Fiber Sourcing.		**Comment addressed in 5.2 of Standard.**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
		Comments #48 - #52 relate to requirement for Volume Credit		
48	3.6.1	The wording within the credit system section on SFI volume credit needs to be strengthened and clarified so that it is acknowledged that inputs can be received with SFI/PEFC dual claim.		**Comment considered but not adopted.**
49	3.6	SFI Volume Credit should align with the PEFC CoC Credit method and move from 12 months to 24 months lifespan.		**Comment addressed with edits to 3.5.7. Now 24 months.**
50	3.6	Review the text in Section 6, 14.4 (Eligibility of Credits - VC Method) and incorporate into 3.6.		**Comment addressed with edits to 3.5.7.**
51	3.6.2	Clarify elements related to multi-site credit and percentage sharing of inputs within a shared product group. Formalize ability to do this under a multi-site. Currently this is only addressed in a note and is not very prominent.		**Comment addressed with edit to 3.2.4.**
*		Adopt Structure like PEFC for identifying Methods / Systems: i.e. Physical Separation, Percent, Credit.		**Comment addressed with edits to Parts 4 and 5 of the Standard.**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
52	3.6.1 / SFI Section 5	The standard needs to be modified to allow for something sourced as PEFC CoC to be added to an SFI Credit account or SFI accounting method at full value or whatever it's respective claim is. The standard needs to recognize that program participants sourcing PEFC manufactured products should get credit.		**Comment addressed in 3.5.1.**
		Comment #53 - #57 relate to pre-consumer recycled definition and use of salvaged / recycled wood.		
53	2.2 / 3.3	Definition of Pre-consumer recycled content, is in conflict with the definition of a primary source.		**Comment considered but not adopted.**
54		Reuse of wood from deconstruction of urban buildings		**Comment addressed with edit to post-consumer definition in Section 14 - Definitions.**
55		Recover wood from urban forests: made them certifiable for CoC and consider additional "green points".		**Comment partially addressed with edit to post-consumer definition in Section 14 - Definitions.** **SFI also investigating an Urban forest module or standard.**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
56		need some level of assurance related to Recycled Content		**Comment addressed in 5.2 of Standard.**
57	2.4.2	Recognition of fiber that is recycled		**Comment addressed in 5.2 of Standard.**
		Comments #58 - #65 relate to internal audits and system requirements.		
58	5.6	Allow internal audits to be done annually (in a calendar year) rather than every 12 months		**Comment addressed with edits to 8.6 in the Standard.**
59	5.5	Need provision that allows new sites to be added to multisite certificate without trigger an out of cycle audit.		**Comment addressed in SFI Section 10, Appendix 1, 3.7.**
60	5.6	Need to allow remote internal audits.		**Comment addressed by edit to 8.6.3 in the Standard.**
61	5.1	Separate system-wide audit requirements from outsourcing internal auditing requirements.		**Comment addressed by edits to Part 9 in Standard.**
62	5.2	Get rid of management commitment language.		**Comment addressed by edit to 8.2.1 of the Standard.**
63	5.2	Review text in Section 6, 14.2 Exemption from Surveillance Audits for inclusion in 5.2		**This guidance text is unchanged - remains in the Guidance Section (Section 7).**
64	5.6	Flexible requirements for auditing central site.		**Comment considered but not adopted.**
65	6.1	Clarify what outsourcing documentation is required		**Comment addressed with edits to Part 9 of Standard.**

SFI Standards Revision Public Comments

October – November 2019 Public Comment Period   **Section 4: Chain of Custody**   **SFI Review Task Force Recommendations**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
66	**Part 1. General**	Scope needs to discuss how the SFI CoC Standard aligns with the applicable UN Sustainable Development Goals.		**Document to be completed by Q4 2020.**
67	**Appendix 2**	Requirements for certificates are to be met by CBs. Move to Section 9.		**Comment addressed by Appendix 3: Certificate Requirements in Section 10.**
68	**Appendix 3**	Clarify the purpose of this appendix (Criteria for the Evaluation of Chain-of-Custody Certification Standards for Use in the SFI Program) or remove from the standard.		**After review, this Appendix has been removed.** **Covered by the definition for: "other credible chain of custody standards".**
69	**Appendix 1**	review text in Section 6, 14.1 (Defining the Product Group) for inclusion in Appendix 1 (Definition of the Product Group)		**Comment addressed with edit to Appendix 1: Definition of the Product Group.**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
1	Parts 1, 2 & 3	Move Section 5 to COC Standard as an Appendix.		Comment considered but not adopted. Decision made to have Label Use remain as its own Section.
2	Part 1 & 2	Consider opportunities to streamline and combine part 1 & 2. The distinction is not clear between these two parts and actually part 1 is more general and high-level than part 2.		Comment addressed with edits throughout SFI CoC Standard.
3	Part 2	create SFI-PEFC dual clam simplified wording		Comment addressed by the SFI Label Recognizing Global Standards.
4	2.2	Make it easier for annual label approval or allow it do be for more than one year.		Staff are designing tools to makes this easier with the new SFI database. Design of tools to be completed by Q4 2020.
5	2.2	Need to clarify process for label approvals template and for blanket approvals.		Staff are designing tools to makes this easier with the new SFI database. Design of tools to be completed by Q4 2020.
6	2.2	Need to allow approved company staff to do own label approvals		Comment considered but not adopted. SFI Office of Label Use to remain entity solely responsible for Label approval.

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
7	2.7	Section 5 needs clarity on private label use.		**Comment addressed with edits to paragraph 2.16.**
8	2.30	Allow companies to add text to labels to provide info on how manufacturer meets/supports SFI.		**New descriptive text contained in paragraph 5.2.**
9	Part 2	Need to clarify what labels can be used with each certification.		**Comment addressed with edits to paragraphs 3.1 and 3.2.**
10	Part 2	No changes to labels or claims		**Comment considered but not adopted.**
11	2.26	Need to address the scenario where the Primary producer makes a product which is 100% certified sourcing but is an interim product (e.g. bleach board). Product is going to be converted by the customer to another product and all trace of the label is lost. Does it make sense for the producer of the interim product to label for Certified Sourcing?		**TG agreed that this comment may be based on a false assumption. Label use is not mandatory as part of the SFI standards.**
12	Appendix 1, 3.1 and 3.2, 4.2 and 4.3	Primary and Secondary producers are not treated the same: Primary Producers must account for 100% of their primary sources as coming from certified sourcing. For Secondary Producers they only need to account for 2/3 from certified sourcing.	Remove the requirement to be a Program Participant in order to be certified to Certified Sourcing.	**Comment addressed with the creation of the new SFI Certified Sourcing Standard primary producers and secondary producers users wishing to use the SFI Certified Sourcing Label.**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
1	10.1.1	Need to review the utility of Biodiversity Hotspots		**References to Biodiversity Hotspots reviewed with the decision taken to remove them from Guidance.** **New SFI Due Diligence System (DDS) addresses sourcing from off-shore sources.**
2	10.1.2	As with Biodiversity Hotspots - need to review utility of High Biodiversity Wilderness Areas.		**References to Biodiversity Hotspots reviewed with the decision taken to remove them from Guidance.** **New SFI DDS will address sourcing from off-shore sources.**
3	10.2	How update to date are the references in this section of Section 6?		**References reviewed and updated as necessary, otherwise they were removed.**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
1	illegal logging	get rid of policy and incorporate into definitions of controversial sources and objective 4 in fibre sourcing and CoC standard		**Comment considered however, policy remains.** **Definition of "illegal logging" has been revised.**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
1		1. During the SFI Standard development, does SFI take into account the ISEAL Impact Code for Good Practices? Yes. The SFI Standard is periodically reviewed through an open and public process that addresses research, responds to emerging issues and ensures continuous improvement of SFI program participants' performance. SFI takes into account many guides and documents during the review. Currently, SFI follows ISO Guide 59 - Code of good practice for standardization – for its own standard setting process. In 2018 SFI became an ISEAL subscriber. ISEAL Subscribers must commit to ISEAL's mission. For SFI's next standard development and revision process, SFI will also take into account ISEAL's Impact Code for Good Practices. (April 2018)		**Interpretation incorporated and is now a requirement of `SFI Section 11**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
1	1. Scope	Clearly state that the requirements of Section 9 apply to the CoC Standard.		**Comment addressed with Scope section of SFI Section 10.**
2		I personally believe that elements of the audit process leave SFI vulnerable to external criticisms that ultimately undermines credibility of the standard. I think the process is flawed in two ways: 1) inconsistent interpretations on indicators that are not easily quantified (like landscape impacts), and 2) the fact that auditors are selected and paid by the organization being audited. / / To address the first flaw, I would like to see auditors attend annual mandatory training that emphasizes correct and consistent interpretations of contentious indicators (like forest conversion, landscape-level impacts, among others). I note that most of these indicators are difficult to quantify, however, they often form the basis for critics to undermine credibility of the standard. I have firsthand experience with lack of consistency in interpretations across auditors, which ultimately adds confusion to certificate holders and provides ammunition for SFI critics. I am aware that auditors have annual meetings at the SFI conference where they talk about auditing practices. I am suggesting more rigorous structure to those meetings, where SFI takes an active role on what is acceptable and not acceptable under the standard. / / Inconsistent auditing practices partially leads to the second flaw in the process, i.e., certificate holders hiring audit firms/auditors that they are "comfortable" working with. I acknowledge that the number of audit firms/auditors are limited (perhaps something else that SFI should work on, i.e., expanding audit capabilities), but in my opinion companies requiring audit services should be assigned an auditor through a process with less apparent conflict of interest. This would reinforce the "external, third party, independence" claim of the audit process.		**Comment considered but not adopted. SFI Auditors conduct an annual calibration session (SFI Auditors Forum) in addition all CBs conduct annual internal training of all auditors as required by and verified their Accreditation Bodies. Second, all major SFM schemes use independent third-party certification bodies and these CBs are paid for by the certified organization. For SFI to be involved with assigning CBs to a company compromises its independence as a standard development organization.**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
3		1. My organization manages forestland and operates manufacturing facilities. Do I need to certify both my forestland to the SFI 2015-2019 Forest Management Standard and my manufacturing facilities to the SFI 2015-2019 Fiber Sourcing Standard? Yes. Per the requirements in the SFI 2015-2019 Forest Management Standard (1.2 Additional Requirements) and SFI 2015-2019 Fiber Sourcing Standard (1.2 Additional Requirements), SFI Program Participants that own or have management authority for forestlands must also conform to the SFI 2015-2019 Forest Management Standard and SFI Program Participants with fiber sourcing programs (acquisition of roundwood and field-manufactured or primary-mill residual chips, pulp and veneer to support a forest products facility) must also conform to the SFI 2015-2019 Fiber Sourcing Standard. However, we understand that an organization might manage multiple forest management units/tenures and operate multiple manufacturing facilities. As such, an organization can choose which forest management units/tenures obtain SFI Forest Management certification. Isolated small forest management units in which the primary purpose is to buffer a manufacturing facility are not required to be certified to SFI Forest Management Standard. These forest management buffer areas may include wood production as an additional goal but not the primary goal and activities in these buffer areas should reflect the commitment to SFI and be in compliance with the requirements of the SFI 2015-2019 Fiber Sourcing Standard. Furthermore, only those manufacturing facilities that are sourcing from the wood and fiber supply area of the land units/tenures that are certified to the SFI 2015-2019 Forest Management Standard are required to obtain SFI 2015-2019 Fiber Sourcing certification. Organizations with multiple forest management units/tenures and multiple manufacturing facilities have 2 years to ensure certification to	Incorporate Interpretation	**Interpretation incorporated into SFI Section 10.**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
		the respective SFI Standards. Any certification claims, statements or use of the on-product label must follow the rules outlined in SFI's Rules for Use of SFI On-Product Labels and Off-Product Marks (Section 5). (January 2016)		

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
4		Returning to third party independent audits, mentioned in the opening statement, it appears that those following the SFI standards have to make life easier for the auditor to audit. As an example, an AFF/ATFS Tree Farm certification must create unique inspection records for landowners that have more than one non-contiguous landholding. This creates a great deal of extra work and highly confusing to landowners when you tell them that they have multiple tree farm numbers to account. Why not allow multiple parcels under 1 Tree Farm, per landowner, but place a data entry section where all of the parcels can be adequately described within the principal certification. This way an auditor can review all of the parcel locations and pick the one or two parcels that they choose to visit, from the Tree Farm that they select to audit.		**Comment does not pertain to the SFI Standards.**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
5		3. I operate a sawmill and we would like to become certified to the SFI 2015-2019 Chain of Custody standard to meet market demand for SFI COC product. Due to the cost and limited staff, the requirements to also obtain a certification to the SFI 2015-2019 Fiber Sourcing Standard are unobtainable at this time. Moreover, I am being asked for SFI COC product. Can my organization get certified to the SFI 2015-2019 Chain of Custody Standard without having to obtain a certification to the SFI 2015-2019 Fiber Sourcing Standard? No. Per the requirements in the SFI 2015-2019 Chain of Custody Standard (1.2 Additional Requirements), primary producers must also conform to the SFI 2015-2019 Fiber Sourcing Standard if they choose to get certified to the SFI 2015-2019 Chain of Custody Standard. However, we understand the work requirements needed to obtain a certification to the SFI 2015-2019 Fiber Sourcing Standard, and given this work requirement, primary producers have 2 years to ensure certification to the SFI 2015-2019 Fiber Sourcing Standard. This two-year time frame will allow the primary producer to meet immediate market demands, while working towards fiber sourcing certification. Any certification claims, statements or use of the on-product label must follow the rules outlined in SFI's Rules for Use of SFI On-Product Labels and Off-Product Marks (Section 5). Because the average percentage method also makes claims about fiber sourcing, during the two-year transitional period, the primary producer can only use the volume credit method, and can only use the SFI COC label that reads "Certified Chain of Custody, Promoting Sustainable Forestry." (August 2016)	Incorporate Interpretation	**Interpretation incorporated into SFI Section 10.**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
6		5. Does SFI have separate requirements for small and/or medium sized management units that take into account the scale and intensity of operations? Yes, SFI Inc has two optional modules for smaller operations; a SFI Small Lands Group Certification Module as well as a SFI Small-Scale Forest Management Module for Indigenous Peoples, Families and Communities. Both of these optional modules take into account scale and intensity of smaller operations. The SFI 2015-2019 Forest Management Standard also addresses size and scale through forest management planning under Performance Measure 1.1, Indicator 1. Performance Measure 1.1, Indicator 1 states, "forest management planning (shall occur) at a level appropriate to the size and scale of the operation." This indicator lists nine forest management planning activities SFI Program Participants need to address related to size and scale of their operation. They include: a. a long-term resources analysis; b. a periodic or ongoing forest inventory; c. a land classification system; d. biodiversity at landscape scales; e. soils inventory and maps, where available; f. access to growth-and-yield modeling capabilities; g. up-to-date maps or a geographic information system (GIS); h. recommended sustainable harvest levels for areas available for harvest; and i. a review of non-timber issues (e.g., recreation, tourism, pilot projects and economic incentive programs to promote water protection, carbon storage, bioenergy feedstock production, or biological diversity conservation, or to address climate-induced ecosystem change). (April 2018)	Incorporate Interpretation	**Interpretation incorporated into SFI Section 10.**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
7	6. Competence & Evaluation of CBs			
8	Part 4	4, 3rd paragraph: "Certification bodies, audit team members, and employers shall notify the audited party of participation in such activities after the three-year period immediately upon initiation of such activities for a period of at least 10 years following the audit."	Change to 3 years or 5 maximum	**Comment considered but not adopted.**
9	Part 5	5.1 Initial Certification: "For the initial certification audit to be completed, the auditee must be an SFI Program Participant or be in the process of becoming one in which case the final certification decision is conditioned on becoming a Program Participant. The SFI certificate(s), Forest Management, Fiber Sourcing or Chain of Custody cannot be issued by the certification body until the applicant has become an SFI Program Participant."	Clarify in 5.1 or in Section 13 who needs to be a Program Participant and what is a program participant.	**Comment addressed with revised definition of "Certified Organization".**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
10	5.4	2. The International Standard, ISO/IEC 17065:2012 is a normative reference for the SFI 2015-2019 Chain of Custody Standard (Section 4) and for the Rules for Use of SFI Certified Sourcing Label (Appendix 1 in Section 3 – SFI 2015-2019 Fiber Sourcing Standard). Clause 7.4.7 in ISO/IEC 17065:2012 only applies to initial audits and states, "If one or more nonconformities have arisen, and if the client expresses interest in continuing the certification process, the certification body shall provide information regarding the additional evaluation tasks needed to verify that nonconformities have been corrected." Does SFI require conformance with ISO/IEC 17065:2012, clause 7.4.7 when addressing major and minor nonconformities for initial audits? Yes. Any certification body that conducts initial audits to the SFI 2015-2019 Chain of Custody Standard (Section 4) or the Rules for Use of SFI Certified Sourcing Label (Appendix 1 in Section 3) must conform to the requirements of ISO/IEC 17065:2012. If a non-conformity is found during the initial audit, a certificate shall not be issued until the certification body verifies that the corrective action was effectively implemented. (January 2016)	Incorporate Interpretation	**Interpretation incorporated into SFI Section 10.**
11	5.6	4. Section 9 - SFI 2015-2019 Audit Procedures and Auditor Qualifications and Accreditation (5.6) states that to maintain SFI 2015-2019 Standard certificates, Program Participants shall recertify their SFI programs to the SFI 2015-2019 Sections 2 and 3 Standards every three years. However, ISO 17021-1:2015 now allows schemes such as SFI to determine a different certification cycle other than 3 years. Will SFI Inc. adopt a different certification cycle for the SFI 2015-2019 Forest Management Standard and the SFI 2015-2019 Fiber Sourcing Standard? Yes. In August 2016, SFI Inc. informed all accredited certification	Incorporate Interpretation	**Interpretation incorporated into SFI Section 10.**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
		bodies and accreditation bodies that as allowed under ISO 17021-1:2015, SFI is reverting to a five-year certification cycle for the SFI 2015-2019 Forest Management Standard and the SFI 2015-2019 Fiber Sourcing Standard. Program Participants can work with their certification bodies on the timeline to transition to the 5-year cycle. (January 2017)		
12	**Appendix 1**	Several requirements seem to be in the wrong SFI Section. For example, Appendix 1 clauses 4.1.2; 4.1.3; 4.1.4; and 7.2 (2nd sentence). These are requirements for the certificate holder, not the CB.	Move these to SFI Sections to 2, 3, and 4.	**Comment considered however, to avoid repeating the requirements in each of the 4 SFI Standards they have been kept in Section 10.**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
1	1. a - h	Clearer measurement of benefits and transparency in public summaries		**Comment partially addressed with new requirement to include the summary of the FECV assessment in the public summary report.**
2		1. SFI Section 10 - Communications and Public Reporting requires a public summary audit report to summarize the results of a SFI 2015-2019 Forest Management or a SFI 2015-2019 Fiber Sourcing audit. The report shall include as one of the items: (f) the dates the audit was conducted and completed. This shall include the number of auditor days spent to conduct the audit, broken down by auditor time spent off and onsite. This shall include the specific woods operations visited if there is more than one operation/region associated with the certificate. Acknowledging that the purpose of the public summary audit report is to transparently communicate the results of a SFI 2015-2019 Forest Management or SFI 2015-2019 Fiber Sourcing audit, can the public summary report record the number of onsite audit days, and then describe the overall intent and purpose of what occurred during the offsite audit days, without stating the actual number of offsite audit days spent to conduct the audit? Yes. For the public summary report to effectively and transparently communicate the audit results, the report shall record the number of onsite audit days, and then can state the overall intent and purpose of what occurred during the offsite audit days. Onsite audit days are days		**Comment addressed with incorporation of July 2017 interpretation.**

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
		spent assessing operations in the field to verify conformance with SFI requirements such as long-term sustainable harvest levels, prompt reforestation, implementation of water quality best management practices, conservation of biodiversity and logger training. To do this auditors review management plans and related documents; conduct interviews with the program participant's staff, contractors and stakeholders; assess harvesting operations and silviculture and road construction and road maintenance practices. Offsite audit days on the other hand are used for planning the audit, document review and report writing and this process can be described in a qualitative manner in the public summary report without revealing the actual number of offsite audit days. (January 2017)		
3		2. SFI Section 10 - Communications and Public Reporting requires that a public summary audit report summarize the results of a SFI 2015-2019 Forest Management or a SFI 2015-2019 Fiber Sourcing audit. Requirement (h) states the report shall include "the certification decision." Because the decision occurs after the audit report is completed, is it more accurate for Section 10 to require that the public summary audit report record "the certification recommendation?" Yes. The intent is for the "certification recommendation" by the Lead Auditor to be included in the audit report. The certification recommendation is then reviewed by an independent reviewer and, if the audit file supports the recommendation, the reviewer will make the decision to grant certification. A positive certification decision can be verified on the SFI program website through a valid SFI certificate. (January 2017)		Comment addressed with incorporation of January 2017 interpretation.

Comment #	SFI 2015-2019 Clause	Comment	Proposed new language	Comment Disposition at May 1, 2020
4		3. Performance Measure 14.1 as well as Section 10 state, "A SFI Program Participant shall provide a summary audit report (one copy must be in English) to SFI Inc. after the successful completion of certification." How long after the successful completion of the audit shall it take to make the summary report publicly available on the SFI website? The summary report shall be posted to the SFI website within 90 days of the successful completion of certification. (April 2018)		**Comment addressed with incorporation of April 2018 interpretation.**

Comment #	SFI 2015-2019 Clause	Comment	Comment Disposition at May 1, 2020
1	**Aquatic Species**	"Animals that live on or within water during some stage of their development." Missing from this definition are plants and other organisms. Aquatic species are not limited to only animals. The definition should be more comprehensive to include plants and other organisms.	**Comment considered but definition is unchanged. The intent of this definition and requirements in the SFI Forest Management Standard were purposefully focused on fish and aquatic animal species.** **Adding plants to the definition is a significant change in the requirements and should be considered carefully. SFI is a forest management standard and aquatic animal species are most likely to be impacted by forest management activities.**
2	**best management practices", "practices", "best practices", "forest management practices", "management practices", and "protection measures".**	There are a number of references within the standard to "best management practices", "practices", "best practices", "forest management practices", "management practices", and "protection measures". Best management practices is the only term defined and the definition is related only to water quality. The use of these different terms is confusing and could result in inconsistent application of the Standard.	**The term "practices" is now a defined term.** **Also, definition of "protection" has been expanded to include "protect".**

Comment #	SFI 2015-2019 Clause	Comment	Comment Disposition at May 1, 2020
3	"best management practices (BMPs)"	There are many problematic items with the current definition: 1. Sole emphasis on water quality as the only ecosystem service to be protected 2. No mention of mitigation 3. Emphasis on regulatory requirements as mandating BMPs – many BMPs are proposed by forestry companies through research and collaborative studies and projects (FMWSI) Cumbersome wording of environmental, technological, economic, etc. considerations – simplicity might be better here to convey the purpose of a BMP	**Comment considered but definition is unchanged.** **The Best Management Practices definition was developed in 1995 and has its origins in legislation that has not changed significantly. It is intentionally focused on water quality protection.** **Mitigation would be a significant addition and should be separated out from the definition of BMPs which, in included, would create a cascade of changes and new requirements throughout the SFI Standards.**
4	Avoid	Mentioned 45 times in the standard but not defined.	**Comment considered but the term avoid is not defined.** **Avoid is a very common term that is generally understood.**
5	Conservation and Protection	If the definition of conservation is to "protect plant and animal habitat" then "conservation" and "protection" are essentially the same and it would be helpful for Program Participants to identify them as being the same in Section 13. For example, FSC provides a joint definition for Conservation/ Protection and indicates that they are used interchangeably. Because "conservation" has two meanings in the SFI definitions, when the first of these definitions is intended (protect plant and animal habitat) then consider using "protection" for consistency. If they are intended to be different, recommend removing the word 'protection' from the definition of 'conservation'	**Comment addressed with revised definition for "protection".**

Comment #	SFI 2015-2019 Clause	Comment	Comment Disposition at May 1, 2020
6	Protect and maintain	The phrase 'Protect and Maintain' is used in a few of the Objectives and in a several Performance Measures and Indicators. However, the distinction between these two terms is unclear. 'Protection' is defined in Section 13 (glossary) as 'Maintenance of the status or integrity over the long-term…'. Maintain is not defined in Section 13 and it is unclear how the definition would differ from that of protection.	**Comment addressed with revised definition for "protection".**
7	Definition of FECV	FECV - definition should allow compatibility to other standards (e.g. HCVs)	**Definition remains unchanged however, clarified that the term FECV includes critically imperiled and imperiled species and "natural communities".**
8	Definition of FECV	Proactively try to be consistent with other certification scheme definitions and processes.	**Definition remains unchanged however, clarified that the term FECV includes critically imperiled and imperiled species and "natural communities".**
9	Conversion	strengthen somehow	**Comment addressed with revised for "conversion sources". The term conversion is not a defined term. revised**
10	Definition of Land Use Change	Define Land Use change	**Comment considered but not adopted.** **There are requirements regarding the conversion of forest land to non-forest land uses that prevents any such lands from qualifying for SFI Certification.**
11	"Ecologically important sites"	Mentioned 6 times in the standard but not defined.	**Comment address with new defined term "ecologically important".**

Comment #	SFI 2015-2019 Clause	Comment	Comment Disposition at May 1, 2020
12	"Minimize"	The current definition, "To do only that which is necessary and appropriate to accomplish the task or objective described" does not apply with respect to minimizing an impact on the environment. In the Standard "minimize" is used in both the minimal action sense and in the conservation sense.	**Standards (Forest Management and Fiber Sourcing) reviewed to ensure the consistent/correct use of "minimize". Where its use was not clear it was replaced with another term.**
13	"non-forested wetland"	This current definition is unnecessary. Recommend defining "wetland" and then, if necessary, clarifying that a non-forested wetland is one which does not have tree cover. Be consistent in use of the term "wetland" as a standalone, well-defined term – no ambiguity. Also worth noting that in many jurisdictions wetlands can be considered as part of both aquatic and terrestrial systems, and are not solely transitional areas between these systems.	**Comment addressed with revised definition of "wetlands".**
14	Plantation	Plantation - what is it? Need to define it. Maybe call out difference between native trees and non-native trees in plantations.	**Comment considered but not adopted.** **References to 'plantation' is in 1. Scope of the SFI 2022 Forest Management and SFI 2022 Fiber Sourcing Standards. References to stay in this section.**
15	Definition of Program Participant	Definition of **Program Participant** is not clear. In practical terms it only seems applicable to FM/FS organizations.	**New definition adopted: "certified organization"**
16	QLP/CLP	Consider merging the definitions of QLP and CLP	**Comment addressed with the revised definition for "qualified logging professional" and new definition: "certified logging company".**

Comment #	SFI 2015-2019 Clause	Comment	Comment Disposition at May 1, 2020
17	Definition of Sawmills residuals	Are they primary or secondary products?	**Comment considered but not adopted.** **Definition of sawmills residuals is spelled out in the definition of primary sources.** **primary sources: Roundwood (logs or pulpwood) and wood chips. Wood chips include:** **• Field Manufactured Chips - chips produced from roundwood in the forest.** **• Primary Chips - chips produced from roundwood other than in the forest or as residuals from production of other wood products.** **• Mill Residual Chips - chips produced from slabs or other residuals from a primary operation.**
18	Soil quality	Objective 2 - 'Soil productivity' is also used in several Indicators (2, 5, and 6), consider replacing with a broader term such as 'soil quality' or 'soil conservation' that promotes conservation of the range of values and services soils provide.	**Comment addressed with new defined term: "soil health"**
19	"Sustainable forestry"	Ecosystem services conservation as part of sustainable forest management are not well covered in this definition. If the intent is to protect or maintain ecosystem services, this should be stated. As it reads, it appears that ecosystem services are a commodity harvested from the forest.	**Principle 1. Sustainable Forestry has been edited to call include water quantity and climate change adaptation.**

Comment #	SFI 2015-2019 Clause	Comment	Comment Disposition at May 1, 2020
20	water bodies	Mentioned 12 times in the standard but not defined.	**Comment considered but not adopted.** **Discussion centered around not defining other water bodies to not limit inclusion by not specifically naming all other potential water bodies.**
21	native biological diversity	This indicator refers to 'native biodiversity', which is good and should be the focus of biodiversity of conservation efforts; however, the title and the description of the objective along with other indicators only refer to 'biological diversity'.	**Comment addressed with new defined term "natural communities".**