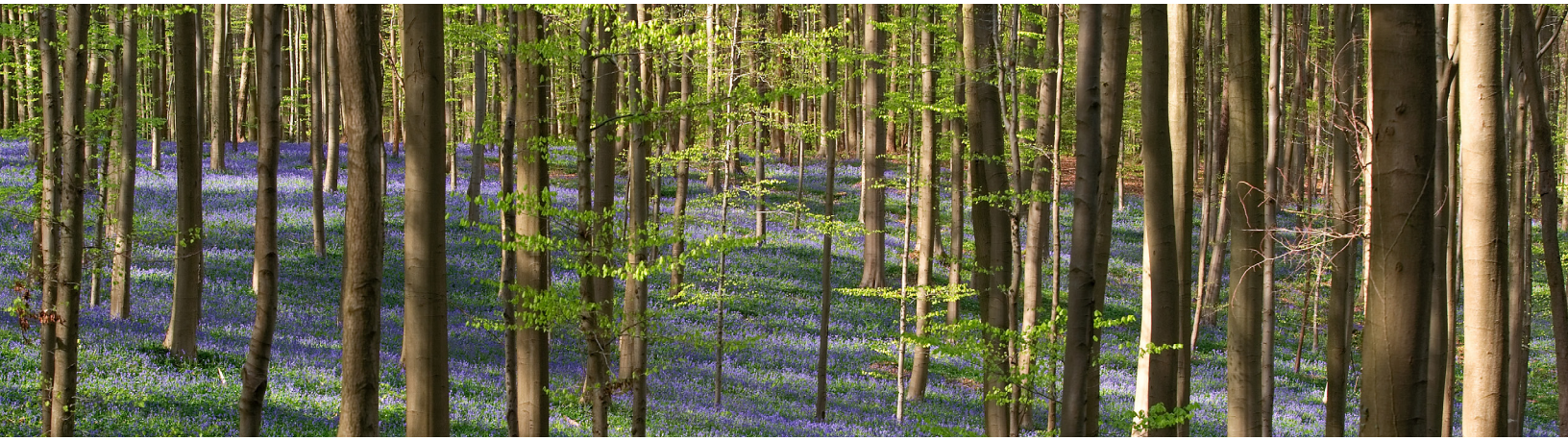
SFI CROSSWALK DOCUMENT FOR THE ALIGNMENT WITH PEFC ST 1003:2024

SUSTAINABLE FORESTRY INITIATIVE
SFI-00001

PEFC
PEFC/29-01-01



THIS DOCUMENT IS NORMATIVE AND COMPLEMENTARY TO THE SFI 2022 FOREST MANAGEMENT STANDARD

PART 1: INTRODUCTION

This document outlines how the current suite of Sustainable Forestry Initiative (SFI) policies and standards align with the PEFC SFM benchmarks included in PEFC ST 1003:2024 to demonstrate SFM standards alignment to EUDR requirements.

This document is normative and complementary to SFI 2022 FOREST MANAGEMENT STANDARD SECTION 2; SFI POLICIES SECTION 8 PART 4 (SFI POLICY ON NO DEFORESTATION, NO FOREST DEGRADATION, AND NO CONVERSION OF NATURAL FORESTS TO PLANTATION FORESTS); SFI DEFINITIONS SECTION 14; and SFI Interpretations.

In relation the application of the SFI system it is important to highlight that All SFI Policies (SFI Section 8) are normative and subject to annual audit by the Certification Body, as required by SFI Section 10, clause 5.4.3, as well as stated in the SFI 2022 Forest Management where Section 8 is listed as a normative reference:

"The certification body shall ensure that the audit objectives and scope as well as the auditor time allocated to the audit: verify that the SFI 2022 Standards Sections 2 and 3,… conform to ***SFI principles, policies, objectives, performance measures, indicators, and any additional indicators*** *that the Certified Organization chooses […]"*

PEFC REFERENCE	PEFC BENCHMARK
Definition 3.7	**Ecologically important forest areas** Forest areas: a) Containing protected, rare, sensitive, or representative forest ecosystems; b) Containing significant concentrations of endemic species and habitats of threatened species, as defined in recognised reference lists; c) Containing endangered or protected genetic in situ resources; d) Contributing to globally, regionally, and nationally significant large landscapes with natural distribution and abundance of naturally occurring species.
SFI DOCUMENT/SECTION	**COMMENTS**
SFI 2022 FOREST MANAGEMENT STANDARD; SFI DEFINITIONS SECTION 14.	The term 'ecologically important' applies to species and natural communities for forest lands, non-forested lands (i.e., grasslands) and non-forested wetlands. The SFI 2022 Forest Management Standards has two indicators which specifically address ecologically important ecosystems on non-forested ecosystems: Indicator 1.4.2 a. (non-forested lands) and Indicator 4.1.6. (non-forested wetlands). So the term absolutely applies to non-forested lands. Below is how the SFI definitions align with the 4 sets of requirements for ecologically important forest and non-forest areas in PEFC's definition: a. protected, rare, sensitive or representative non-forest ecosystems: the term is referenced in the standard for both forested lands as well as non-forest lands. As such, it is already clear the term can apply to both types of ecosystems. Indicator 1.4.2 a. specifically addresses afforestation of ecologically important natural communities, preventing the conversion of non-forested ecosystems such as grasslands. Organizations will map their forest area to identify ecologically important non-forest areas and will implement protective measures to ensure they are not impacted by forestry operations. Indicator 4.1.6 requires the identification and protection of non-forested wetlands[1], which include bogs, peatlands, fens and marshes, and vernal pools that are ecologically important. Here too, the organization shall map all the non-forested wetlands within their forest area and implement protective measure ensuring these features and the accompanying riparian zones are not impacted by forestry operations. The above measures demonstrate conclusively that the term 'ecologically important' applies to non-forested habitats and communities. Similarly, they demonstrate the protections SFI requires has for non-forested ecosystems. b. significant concentrations of endemic species and habitats of threatened species, as defined in recognised reference lists: Ecologically important non-forested species or communities (i.e. not officially designated for regulatory protection, nor ranked G1 or G2), are identified using a program[2] that evaluates conservation opportunities for candidate species or communities that are not addressed through Forests with Exceptional Conservation Value. Certified organizations do this by identifying ecologically important endemic species and communities for protection and developing the necessary protective conservation measures for these selected species and habitats. These measures could involve removing these habitats and features from areas planned for harvest or buffering these areas to ensure minimal negative impact due to harvesting operations. c. endangered or protected genetic in situ resources: Non-forested in situ genetic resources (flora and fauna) that are endangered or protected will typically be addressed with regulatory measures. In the event they are not, certified organizations would use the same process as outlined above in 2) b., to identify and protect these occurrences of ecologically important flora and fauna. Measures could include removing these sites from harvest areas or implementing buffers to minimize negative impacts. d. globally, regionally and nationally significant large landscapes with natural distribution and abundance of naturally occurring species: Non-forested landscapes that are large enough to be globally, regionally or nationally significant would be designated for regulatory protection and/or ranked G1 or G2. As such these areas would be protected from harvest.

[1] Non-forested wetland: a transitional area between aquatic and terrestrial ecosystems that does not support tree cover and is inundated or saturated for periods long enough to produce hydric soils and support hydrophytic vegetation.
[2] Program: An organized system, process or set of activities to achieve an objective or performance measure.

SFI 2022 FOREST MANAGEMENT STANDARD; SFI DEFINITIONS SECTION 14.	SFI gives company foresters, biologists and ecologists the discretion to address vulnerable and locally rare species in multiple ways. This allows Certified Organizations to determine which species or natural communities should be considered, taking into consideration their rarity, regional importance, and sensitivity to, or reliance upon, forest management activities. To do this they use various resources to determine species or habitat rarity which may include NatureServe G or S ranks, the International Union for Conservation of Nature Red List, and federal, provincial, or state lists. Additional resources for determining regional importance may include The Nature Conservancy ecoregional plans, State Wildlife Action Plans, or other credible conservation plans. Information regarding known occurrences (i.e., verified on the ground) can be drawn from NatureServe, state/provincial natural resource agencies, Conservation Data Centers, or other regional mapping efforts or assessments. Ecologically important species or natural communities could include species and habitats that that are ranked G3 or S1-S3 by NatureServe. Using the professional judgement of company foresters, biologists and ecologists these species and natural communities can be classified as ecologically important. Their selection may also be based on potential opportunities for the managed area to aid in the recovery or perpetuation of that species (note that G1-G2 species are already afforded protection by definition and related requirements under Forests with Exceptional Conservation Value). For example, the Gopher tortoise (Goperhus polyphemus), ranked G3, is considered an ecologically important species across much of its range. Many forest managers in the Gopher tortoise's range in the U.S. South include specific attention to the needs of that species in management planning.

PEFC REFERENCE	PEFC BENCHMARK
Definition 3.11	**Forest conversion to agricultural use** Change of forest to agricultural use whether human-induced or not. *Note: Regeneration by planting or direct seeding and/or the human-induced promotion of natural seed sources, to the same dominant species as was harvested or other species that were present in the historical species mix is not considered a conversion to agricultural use.*
SFI DOCUMENT/SECTION	**COMMENTS**
SFI 2022 FOREST MANAGEMENT STANDARD; SFI DEFINITIONS SECTION 14.	The SFI **deforestation** definition covers the Forest conversion to agricultural use and Forest conversion to other land use definitions as per PEFC ST 1003:2024. Both these types of conversion are prohibited under SFI certification according to Performance Measure 1.3 of SFI 2022 FOREST MANAGEMENT STANDARD. In fact, the SFI's definition of deforestation is: "the conversion of forest land to non-forest land use." SFI clearly states in the policy (section 8 part 4) to "prohibiting certification to the SFI 2022 Forest Management Standard on lands that are deforested and on practices that are causing forest degradation after December 31, 2020." Therefore, conversion to agricultural use is prohibited, since the definition of deforestation is any conversion to non-forest land use. Furthermore, Performance Measure 1.3 specifies SFI's commitment to no-deforestation, indicating that "Forest lands converted to other land uses shall not be certified to this SFI Standard.".

PEFC REFERENCE	PEFC BENCHMARK
Definition 3.13	**Forest degradation** Structural changes to forest cover, taking the form of the conversion of: a) primary forests or naturally regenerating forests into plantation forests or into other wooded land; or b) primary forests into planted forests.
SFI DOCUMENT/SECTION	**COMMENTS**
SFI 2022 FOREST MANAGEMENT STANDARD; SFI DEFINITIONS SECTION 14.	**Forest Degradation:** Direct human impacts to forest landscapes, which result in [an enduring reduction in] / [reduced capacity to provide] ecosystem services. (Source: Canadian Council of Forest Ministers definition, subject to change). The SFI 2022 Forest Management Standard does not permit the conversion of natural forests into plantation forests. For example, the SFI 2022 Forest Management Standard prevents forest degradation through five core areas which act to limit lasting and significant direct anthropogenic impacts to the structure, composition, or function of the forest. 1. PRODUCTIVITY (e.g., growing stock, non-timber forest products) • Prompt forest regeneration after harvest: Performance Measure (PM) 2.1. • Maintenance of forest soils and stocks: PM 2.3. 2. BIOLOGICAL DIVERSITY (e.g., ecosystem state, forest fragmentation, species, species functional groups) • Protection and maintenance of native biodiversity: PM 4.1. • Conservation of species at risk and rare communities: PM 4.2. • Identification and protection of ecologically important sites: PM 4.3. 3. DISTURBANCES (e.g., alien invasive species, fire, water quantity) • Protection of water values: PM 3.2. • Avoidance of negative effects of biological agents: PM 2.4. • Limitations of forest degradation from wildfire and restore forest post-wildfire: PM 10.1. 4. CARBON STORAGE • Enhancement of opportunities for carbon capture on forests that are owned or managed: PM 9.2. 5. PROTECTIVE FUNCTIONS (e.g., soil erosion, water quality) • Maintenance of forest soils and stocks: PM 2.3. • Protection of water values: PM 3.2. To confirm the avoidance of the changes to forest cover taking the form of the conversion as per PEFC ST 1003:2024 must be noted the following: » SFI Forest Management Standard does prevent forest degradation (see comment to “forest degradation” definition above). » The SFI Board policy clearly prohibits certification to the SFI 2022 Forest Management Standard on lands that are deforested. » deforestation is defined as: The conversion of forest land to non-forest land use. » This definition includes agriculture use since it is non-forest land. » The SFI Board Policy clearly states that the Forest Management Standard does not permit the conversion of natural forest to plantation. Furthermore, there are several indicators (outlined below) in the SFI 2022 Forest Management Standard that prevent a SFI forest from being classified as a plantation. So regardless of the type of conversion, if it is managed to the SFI 2022 Forest Management Standard, it will never be a plantation forest. These include: • Prior to harvest, Indicator 1.1.1 requires that stands are surveyed by resource professionals such as foresters, biologists, and ecologists to identify amongst other features, the range of tree and plant species and stand level wildlife habitat elements present in the stand.

SFI 2022 FOREST MANAGEMENT STANDARD; SFI DEFINITIONS SECTION 14.	• Where trees species are identified that are not ecologically appropriate, Indicator 1.2.1 allows their replacement with an ecologically appropriate species thereby maintaining native forest cover types and ecological function. (An example would be replacing a stand of sand pine, planted extensively along the US Gulf coast for erosion prevention in the 1940s & 50s, with longleaf pine which is the more ecologically appropriate species, and which historically occupied these sites). • Following the assessment from Indicator 1.2.1, Performance Measure 2.1 ensures that an ecologically appropriate range of species (native or naturalized species) is either left on the site post-harvest (hardwood streamside management zones for example) or re-established promptly after harvest thereby avoiding the creation of plantation forests. Regenerated stands retain or quickly regrow their herbaceous understory and varying species of woody plants on site as described below which results in more than two species existing in a forest. • Indicator 4.1.2 requires that certified organizations identify wildlife habitat elements existing in the stand that are to be protected during harvest. This includes standing dead trees, stumps, burrows or mounds, nest trees, and den trees. This inventory ensures that these attributes are present in the stand post harvest reducing the characteristics of a plantation forest which are typically devoid of these elements. • SFI-certified organizations must implement a program, which is audited by their certification body, that supports the diversity of native forest cover types and age or size classes that enhances biological diversity at the landscape or ownership level as required by Indicator 4.1.3. - other wooded lands – PM 1.3 does not permit forests converted to non-forest to be included in an SFI Forest Management certificate. Land which would meet the PEFC definition of 'other wooded land' would not meet the SFI definition of 'forest' and would be defined as non-forest. Therefore, conversion to 'other wooded lands' would fall under PM 1.3 and not permitted in an SFI Forest Management certificate. - naturally regenerating forests into other wooded lands – here too the SFI definition of deforestation and PM 1.3 prevent naturally regenerating forest from being converted to other wooded lands. - primary forests into planted forests – In accordance with the SFI Board Policy, an SFI certified forest can only be classified as a natural or semi-natural planted forest. An SFI certified forest can never be a plantation forest. By way of example, the majority of primary forests in Canada are in the Boreal forest. If primary forest were harvested, the harvest area would be regenerated naturally from seed source stored in the soil or via suckering of deciduous species.

PEFC REFERENCE	PEFC BENCHMARK
Definition 3.22	**Naturally regenerating forest** Forest predominantly composed of trees established through natural regeneration; it includes any of the following: a) forests for which it is not possible to distinguish whether planted or naturally regenerated; b) forests with a mix of naturally regenerated native tree species and planted or seeded trees, and where the naturally regenerated trees are expected to constitute the major part of the growing stock at stand maturity; c) coppice from trees originally established through natural regeneration; d) naturally regenerated trees of introduced species. Note: Application of the definition requires consideration of national forestry terminology and legal requirements.
SFI DOCUMENT/SECTION	**COMMENTS**
SFI 2022 FOREST MANAGEMENT STANDARD; SFI DEFINITIONS SECTION 14.	While SFI does not use the definition 'naturally regeneration forest' in its FM Standard, it does have a definition for 'natural regeneration' which is defined as: '*Establishment of a plant or a plant age class from natural seeding, sprouting, suckering, or layering*.' When used with Indicator 2.1.1, SFI meets the intent of the definition 'naturally regenerating forest'. Additionally, Indicator 2.1.1 of the Forest management Standard has strict requirements for prompt reforestation after harvest: "*Indicator 2.1.1 - 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 five years*."

PEFC REFERENCE	PEFC BENCHMARK
Definition 3.13	**Primary forest** Naturally regenerating forest of native tree species, where there are no clearly visible indications of human activities, and the ecological processes are not significantly disturbed. *Note: Application of the definition requires consideration of national forestry terminology and legal requirements.*
SFI DOCUMENT/SECTION	**COMMENTS**
SFI 2022 FOREST MANAGEMENT STANDARD; SFI DEFINITIONS SECTION 14.	SFI follows the Canadian government definition of 'primary forests' which the Canadian Foret Service defines as 'a naturally generated forest of native species that shows no clearly visible signs of human activity and whose ecological processes have not been significantly disturbed.' Note that this definition aligns with the PEFC and FAO definition. The definition for 'native forest' is a compound definition using the definitions for 'native' and 'forest.' • native: Species of ecological communities occurring naturally in an ecological region, as neither a direct or indirect consequence of recent human activity. • forest: Land spanning more than 0.5 hectares (1.2 acres) with trees higher than 5 meters (16.4 feet) and a canopy cover of more than 10 percent, or trees able to reach these thresholds in situ. It does not include land that is predominantly under agricultural or urban land use. Supporting the concept of 'native forests' is the SFI definition of 'semi-natural planted forest.' • semi-natural planted forest: A semi-natural planted forest includes many of the characteristics of native ecosystems. Forests established through planting or seeding that, at stand maturity, resemble or will resemble a native forest cover type are considered planted forests, and are not considered plantations. Additionally, a semi-natural planted forest includes forests planted for protection or ecosystem restoration following large-scale disturbances such as fires, insect outbreaks, natural disturbance, or windthrow. Since both 'semi-natural planted forests' and 'native forests' exhibit a history of human disturbance (e.g., harvesting or other silvicultural activities). Semi-natural planted forests are composed of trees established through planting and/or deliberate seeding. Native forest can be composed of trees established through natural regeneration as well as planting and/or seeding.

PEFC REFERENCE	PEFC BENCHMARK
Chapter 6: Planning, Updating requirement 6.3.1.2 with adding text ", trade, customs"	6.3.1.2 The standard requires that the organisation shall comply with applicable local, national and international legislation on forest management, including but not limited to forest management practices; nature and environmental protection; protected and endangered species; property, tenure and land-use rights for indigenous peoples, local communities or other affected stakeholders; health, labour and safety issues; anti-corruption, trade, customs and the payment of applicable royalties and taxes.
SFI DOCUMENT/SECTION	**COMMENTS**
SFI 2022 FOREST MANAGEMENT STANDARD;	SFI addresses legal and regulatory compliance with Forest Management Standard Objective 11. The United States and Canada have many pieces of legislation and regulation that address legislation regarding commercial trade. These pieces of legislation are at the federal and state (US) or provincial (Canada) level. Given the number of forested jurisdictions in the US and Canada (45+), specifically calling out commercial trade (customs) legislation and regulation in Objective 11, but not other legislation is a practical approach. https://forests.org/wp-content/uploads/2022_SFI_StandardsandRules_section2.pdf As legally registered commercial entities in the US and Canada, SFI Forest Management certified organizations must comply with the applicable legislation for the jurisdiction where they operate, including compliance with federal legislation for 'trade and custom'.

SFI 2022 FOREST MANAGEMENT STANDARD;	**US** US trade and customs legislation encompasses a broad range of laws and regulations governing international trade and customs practices. Key areas include customs duties (19 U.S.C.), trade remedies like antidumping and countervailing duties, and various acts promoting or restricting trade. Legislation also addresses issues like forced labor, export controls, and trade agreements. Key legislative areas are: i. Customs Duties (19 U.S.C.): outlines the duties, taxes, and fees levied on imported goods. ii. Trade Remedies: The Trade Act of 1974 and subsequent legislation allow for trade remedies like antidumping and countervailing duties to address unfair trade practices. iii. Export Controls: Laws like the Export Administration Regulations (EAR) restrict the export of certain goods for national security and foreign policy reasons. iv. Trade Agreements: The US has various free trade agreements and other trade agreements with numerous countries. **Canada** The key legislation governing trade and customs is the Customs Act and the Customs Tariff Act. The Customs Act outlines the procedures for reporting imports, valuing goods for duty purposes, and regulates the activities of the Canada Border Services Agency (CBSA). The Customs Tariff Act specifies the duties and classification system for imports and exports, including tariff preferences granted under free trade agreements. 1. Customs Act. Key Functions are: i. Ensures the collection of duties. ii. Controls the movement of people and goods into and out of Canada. iii. Establishes procedures for reporting imports. iv. Specifies how goods are valued for duty purposes. v. Regulates the authority of the CBSA. 2. Customs Tariff Act. Key functions are: i. Specifies the duties and classification system for imports and exports. ii. Lists the customs duty for each item according to its classification under the harmonized classification system. iii. Provides tariff preferences granted under free trade agreements

PEFC REFERENCE	PEFC BENCHMARK
Chapter 8: Operation, the former 8.1.4 is separated into two requirements, first addressing the 'forest conversion to agricultural use', 8.1.4.	8.1.4 The standard requires that forest conversion to agricultural use shall not occur.
SFI DOCUMENT/SECTION	**COMMENTS**
SFI 2022 FOREST MANAGEMENT STANDARD; SFI DEFINITIONS SECTION 14 and SECTION 8 POLICIES	The SFI deforestation definition covers the Forest conversion to agricultural use and Forest conversion to other land use definitions as per PEFC ST 1003:2024. Both these types of conversion are prohibited under SFI certification according to Performance Measure 1.3 of SFI 2022 FOREST MANAGEMENT STANDARD. In fact, the SFI's definition of deforestation is: "the conversion of forest land to non-forest land use." SFI clearly states in the policy (section 8 part 4) to "prohibiting certification to the SFI 2022 Forest Management Standard on lands that are deforested and on practices that are causing forest degradation after December 31, 2020." Therefore, conversion to agricultural use is prohibited, since the definition of deforestation is any conversion to non-forest land use. Furthermore, Performance Measure 1.3 specifies SFI's commitment to no-deforestation, indicating that "Forest lands converted to other land uses shall not be certified to this SFI Standard.". Finally, the SFI Board reconfirmed its commitment to no deforestation and no forest degradation by explicitly prohibiting certification to the SFI 2022 Forest Management Standard on lands that are deforested and on practices that are causing forest degradation after December 31, 2020. This is addressed in the SFI Policy on No Deforestation and No Forest Degradation, and No Conversion of Natural Forest To Plantation Forests.

PEFC REFERENCE	PEFC BENCHMARK
Introducing new requirement on forest degradation 8.1.6	8.1.6 The standard requires that human-induced forest degradation shall not occur. Note 1: Plantation forests established by converting primary forest or naturally regenerating forests after 31 December 2010 are not eligible for certification. Note 2: Planted forests established by converting primary forest after 31 December 2010 are not eligible for certification. Note 3: This requirement is not applicable for plantation forests established for protection or ecosystem restoration, as well as forests established through planting or seeding which at stand maturity resemble or will resemble naturally regenerating forests Note 4: Incorporation of the definition into regional, national or subnational standards may consider the context of national forestry terminology and legal requirements. This can result in system-specific clarifications and guidance, as long as this delivers at minimum an equivalent outcome to the intended outcome of the definition.
SFI DOCUMENT/SECTION	**COMMENTS**
	Reference: SFI Policy of No Deforestation and No Forest Degradation (March 2024) Content: Since 2015 the SFI Forest Management Standard prohibits deforestation and forest degradation through multiple requirements in the Standard. The SFI Board reconfirmed its commitment to no deforestation and no forest degradation on March 20, 2024, by explicitly prohibiting certification to the SFI 2022 Forest Management Standard on lands that are deforested and on practices that are causing forest degradation after December 31, 2020. In the spirit of rehabilitating degraded lands and/or non-forest lands to sustainably managed forests, certification to the SFI 2022 Forest Management Standard is allowed, as long as the current SFI certified organization did not cause the deforestation, and is rehabilitating the lands, and is meeting the requirements of the SFI 2022 Forest Management Standard. In addition, the SFI 2022 Forest Management Standard does not permit the conversion of natural forests to plantation forests. On May 20, 2025, the SFI Board prohibited the conversion of natural forests to plantation forests after December 31,2020. This is supported by: • SFI's definitions of Plantation Forest, Semi-Natural Planted Forest, and Native Forest. Notably, SFI's definition of native forests aligns with definitions of natural forests used by other organizations. • Requirements within the SFI 2022 Forest Management Standard that collectively ensure planted forests are regenerated in ways that prevent them from exhibiting the characteristics of a plantation forest. DEFORESTATION The SFI 2022 Forest Management Performance Measure 1.3 specifies SFI's commitment to no-deforestation, indicating that "Forest lands converted to other land uses shall not be certified to this SFI Standard." These restrictions are intended to apply to the conversion of forest land and recently deforested land that is capable of regenerating to forest but is preventing from doing so. Note that the definition of deforestation does not apply to activities needed to achieve sustainable forest management which includes forest lands used for forest and wildlife management such as wildlife food plots or infrastructure such as forest roads, log processing areas, trails etc. This is consistent with Performance Measure 1.3, Indicator #1 in the SFI 2022 Forest Management Standard. FOREST DEGRADATION The SFI 2022 Forest Management Standard prevents forest degradation through five core areas which act to limit lasting and significant direct anthropogenic impacts to the structure, composition, or function of the forest. Below are those areas and the key requirements of the SFI 2022 Forest Management Standard. 1. PRODUCTIVITY (e.g., growing stock, non-timber forest products) • Prompt forest regeneration after harvest: Performance Measure (PM) 2.1. • Maintenance of forest soils and stocks: PM 2.3. 2. BIOLOGICAL DIVERSITY (e.g., ecosystem state, forest fragmentation, species, species functional groups) • Protection and maintenance of native biodiversity: PM 4.1. • Conservation of species at risk and rare communities: PM 4.2. • Identification and protection of ecologically important sites: PM 4.3.

	3. DISTURBANCES (e.g., alien invasive species, fire, water quantity) • Protection of water values: PM 3.2. • Avoidance of negative effects of biological agents: PM 2.4. • Limitations of forest degradation from wildfire and restore forest post-wildfire: PM 10.1. 4. CARBON STORAGE • Enhancement of opportunities for carbon capture on forests that are owned or managed: PM 9.2. 5. PROTECTIVE FUNCTIONS (e.g., soil erosion, water quality) • Maintenance of forest soils and stocks: PM 2.3. • Protection of water values: PM 3.2. SFI Performance Measure 1.2 lays out specific constraints on conversion of one forest cover type to another forest cover type, which in turn also prevents forest degradation. In particular, PM 1.2 precludes conversion of one forest cover type to another forest cover type in the absence of objectives for long-term outcomes that support maintaining native forest cover types and ecological function. This includes where conversion puts rare; ecologically important, native forest cover types at risk of becoming rare, or where conversion creates significant adverse impacts on Forests with Exceptional Conservation Value, old growth forests, or forests critical to threatened and endangered species. PEFC Definitions 3.28: Plantation forest Planted forest that is intensively managed and meets, at planting and stand maturity, all the following criteria: one or two species, even age class, and regular spacing. It includes short rotation plantations for wood, fibre and energy, and excludes forests planted for protection or ecosystem restoration, as well as forests established through planting or seeding which at stand maturity resemble or will resemble naturally regenerating forests. Note: Application of the definition requires consideration of national forestry terminology and legal requirements. Performance Measure 1.2. Certified Organizations shall not convert one forest cover type to another forest cover type unless an assessment has been conducted to determine ecological impacts and provide appropriate justification.

PEFC REFERENCE	PEFC BENCHMARK
Appendix 1	
SFI DOCUMENT/SECTION	**COMMENTS**
	Appendix 1 is specific to Plantation Forests and is **not applicable to the SFI Forest Management Standard. Plantation Forests as defined by PEFC are not in scope for the Standard**. this wis made clear by the SFI Board policy on deforestation and no forest degradation which explicitly prohibits certification to the SFI 2022 Forest Management Standard lands that are deforested and on practices that are causing forest degradation after December 31, 2020.See the SFI Policy on No Deforestation and No Forest Degradation, and No Conversion of Natural Forest To Plantation Forests. https://forests.org/wp-content/uploads/2022_SFI_Standards_Section7-U.pdf (p.2/33) The PEFC definition pf plantation forests clearly demonstrate that forest management in accordance with the SFI Forest Management Standard does not result in plantation forests. PEFC Definitions 3.28 Plantation forest Planted forest that is intensively managed and meets, at planting and stand maturity, all the following criteria: one or two species, even age class, and regular spacing. It includes short rotation plantations for wood, fibre and energy, and excludes forests planted for protection or ecosystem restoration, as well as forests established through planting or seeding which at stand maturity resemble or will resemble naturally regenerating forests. Note: Application of the definition requires consideration of national forestry terminology and legal requirements.