

## SFI Small Lands Group Certification Module

### PREAMBLE

The Sustainable Forestry Initiative (SFI) and American Forest Foundation (AFF) collaboratively developed a Small Lands Module that is based on the foundation of the *SFI 2022 Fiber Sourcing Standard* and incorporates the AFF Standards of Sustainability for Forest Management under the American Tree Farm System (“AFF Standards”). Lands certified through this module in the United States will be certified under the American Tree Farm System (ATFS) with resultant “certified forest content” under the *SFI 2022 Chain of Custody Standard*. Lands certified in Canada to the *SFI Small Lands Group Certification Module* will be “SFI certified” and the resultant fiber also “certified forest content” under the *SFI 2022 Chain of Custody Standard*.

Due to the interdependence of the SFI 2022 Fiber Sourcing Standard, AFF 2021 Standards, and this *SFI Small Lands Group Certification Module*, revision to any of these standards will trigger a collaborative review and potential revision to the module as needed to ensure consistency and continual improvement.

### 1. GENERAL

#### 1.1 Scope

This module applies to a *SFI Program Participant* certified to the *SFI 2022 Fiber Sourcing Standard*.

##### 1.1.1 Maximum size of ownership eligible for certification under this Module

A non-industrial, small forest ownership, under the scope of this *SFI Small Lands Group Certification Module*, shall have no more than 20,000 acres or 8,000 hectares in aggregate across their entire ownership, regardless of whether it is managed by the *landowner* or a *landowner agent*. Those *landowners* with more than 20,000 acres or 8,000 hectares in aggregate across their entire ownership shall be certified to the *SFI 2022 Forest Management Standard*. If the small forest or woodlot owner meets eligibility requirements, individual parcels of land that fall within the *wood and fiber supply area* are eligible for inclusion in the *certified area*.

##### 1.1.2 What the SFI Small Lands Group Certification Module Does

The SFI Small Lands Group Certification Module offers certification to a group of small family forest lands, under one certificate, that is managed by a *SFI Certified Organization* that is certified to the *SFI 2022 Fiber Sourcing Standard*. The *SFI Small Lands Group Certification Module* allows *landowners* to sell and *SFI Certified Organization* to procure fiber as certified forest content. Lands certified to this module in the United States are certified to ATFS via the AFF Standards. Lands certified to this module in Canada are SFI certified.

##### 1.1.3 What the SFI Small Lands Group Certification Module Covers

The *SFI Small Lands Group Certification Module* covers:

- requirements of the *SFI 2022 Fiber Sourcing Standard* that include measures to broaden the practice of conservation of biodiversity, use of forestry best management practices to protect water quality, provide outreach to *landowners*, and utilize the services of forest management and harvesting professionals and
- forest management requirements consistent with the 2021-2026 AFF Standards to promote the health and sustainability of America’s family forests. These Standards are designed as a tool to help woodland owners be effective stewards of the land as they adaptively manage renewable resources; promote environmental, economic and social benefits; and work to increase public understanding of sustainable forestry.

- additional requirements relating to the management of the *Group Certification Organization*<sup>1</sup> and additional requirements for sustainable forest management.

#### 1.1.4 Geographic Application of the SFI Small Lands Group Certification Module

The *SFI Small Lands Group Certification Module* applies to organizations (the *SFI Certified Organization*, *landowners* and others involved in the fiber supply chain) in the United States and Canada.

#### 1.1.5 Timing of Applicability

The *SFI Small Lands Group Certification Module* is dependent on the *SFI 2022 Fiber Sourcing Standard* and the AFF 2021-2026 Standards of Sustainability as its foundation. Revision to either of these standards will trigger a collaborative review and potential revision to the *SFI Small Lands Group Certification Module* to ensure consistency and continual improvement. If the Module is not reviewed and approved by both the SFI Board of Directors and AFF Board of Trustees, it will expire with the earliest expiry of either the *SFI 2022 Fiber Sourcing Standard* or AFF's 2021-2026 Standards. If either SFI or AFF wish to make changes to the Module, both organizations must agree and will work to make changes through a collaborative process.

## 1.2 References

This *SFI Small Lands Group Certification Module* incorporates, by dated or undated reference, provisions from other publications. These normative and informative references are cited at the appropriate places in the text and the publications are listed hereafter. For dated and undated references, the latest edition of the application applies.

### 1.2.1 Normative references

- i. ISO/IEC 17021:2011 – Conformity Assessment – Requirements for bodies providing audit and certification of management systems.
- ii. ISO/IEC Guide 2:2004 - Standardization and Related Activities – General Vocabulary
- iii. IAF MD 1:2007 - Certification of Multiple Sites Based on Sampling
- iv. SFI 2022 Standards and Rules:
  - Section 3- *SFI 2022 Fiber Sourcing Standard*
  - Section 8 – SFI Policies
  - Section 10 – SFI 2022 Audit Procedures and Auditor Qualification and Accreditation
  - Section 11 – Communication and Public Reporting
  - Section 13 – Optional Modules
  - Section 14 – SFI Definitions
- v. Interpretations for the Requirements for the *SFI 2022 Standards and Rules*

For the purposes of this Module, the relevant definitions given in ISO/IEC Guide 2:2004 apply together with the definitions in the SFI Definitions (Section 14).

### 1.2.2 Informative References

- i. 2021-2026 - American Forest Foundation Standards of Sustainability for the American Tree Farm System
- ii. 2021-2026 American Forest Foundation Standards of Sustainability for the American Tree Farm

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<sup>1</sup> The requirements for the management of the Group Certification Organization are based on Appendix 2 of Section 10 of the SFI 2022 Standards and Rules and are consistent with AFF's Independently Managed Group requirements

System Guidance

- iii. 2021-2026 American Tree Farm System (ATFS) Independently Managed Group (IMG) Standards
- iv. American Tree Farm System (ATFS) Eligibility Requirements
- v. PEFC ST 1002:2018 - Group Forest Management Certification
- vi. PEFC ST 1003:2018 - Sustainable Forest Management – Requirements
- vii. Section 7 – Guidance to SFI 2022 Standards and Rules
- viii. Section 9 – SFI Standards Development and Interpretations Process
- ix. Section 12 – Public Inquiries and Official Complaints

### 1.3 Definitions

For the purposes of this Module, the relevant definitions given in ISO/IEC Guide 2:2004 apply together with the definitions in the SFI Definitions (Section 14) together with the following definitions.

- **certified area**

The forest area covered by a *group forest certificate* representing the sum of forest areas owned by *landowners* that are *Group Members*. Lands certified to this module in the United States are certified to the American Tree Farm System (ATFS). Lands certified to this module in Canada are SFI certified.

- **group certification organization**

A specific type of multi-site organization where forest owners, forest owners' organizations, forest managers, forest products manufacturers or forest products distributors without a pre-existing legal or contractual link can form a group for the purposes of achieving certification and gaining eligibility for a sampling approach to certification audits against this module (Appendix 1 to Section 10 of the SFI Program).

- **group forest certificate**

A document confirming that the *group certification organization* complies with the requirements for certification to this module.

- **group manager**

An organization with overall responsibility for ensuring the conformity of forest management in the *certified area* of the *Group Certification Organization* to the certification requirements in this module.

The *Group Manager* must be an *SFI Certified Organization*, certified to the *SFI 2022 Fiber Sourcing Standard*, with a fiber sourcing program that acquires roundwood and/or field-manufactured residual chips.

- **group member**

*Landowners* who own land to be certified by the group forest certification or *landowner agents* covered by the *group forest certificate* who have the legal authority to implement the certification requirements within the *wood and fiber supply area*.

- **landowner**

Non-industrial entity or individual that holds title to the property.

- **landowner agent**

A *qualified resource professional*, a *qualified logging professional*, a *certified logging company*, *wood producer* or other individual or organization that has the legal authority to manage forestland and implement the certification requirements on certified lands at the direction of *landowner* members within the *wood and fiber supply area*.

## 2. SFI SMALL LANDS GROUP CERTIFICATION MODULE PRINCIPLES

SFI *Certified Organizations* believe that non-industrial forest *landowners* have an important stewardship responsibility and a commitment to society, and they recognize the importance of maintaining viable commercial, family forest and conservation forest land bases.

SFI *Certified Organizations* are aware that family forest ownership is made up of large numbers of small forest holdings. The limited revenues from forest management operations on the small properties of these *landowners*; periodicity of their management activities and revenues; as well as a limited financial ability to demonstrate their conformity with forest management certification system requirements, represent significant barriers to forest certification.

SFI *Certified Organizations* shall have a written policy (or policies) to implement and achieve the principles defined in *SFI 2022 Fiber Sourcing Standard* together with the following principles in this module:

### 2.1 Voluntary Participation

The *SFI Small Lands Group Certification Module* is based on a respect for property rights and on the voluntary commitment and participation of both *landowners* and *landowner agents*. Participation in the *Group Certification Organization* shall not require or bind *landowners* to harvest and sell timber or to supply the SFI *Certified Organization*; participation also shall not prohibit *landowners* from participating in another *Group Certification Organization* outside ATFS or supplying another customer. Any supply commitments shall be stated in separately negotiated contracts between *landowners* and customers, and not as part of the written agreement(s) required by the *SFI Small Lands Group Certification Module*. SFI and SFI *Certified Organizations* are committed to compliance with the competition laws of the United States and Canada, and the *SFI Small Lands Group Certification Module* shall not be construed to conflict with those laws.

### 2.2 Shared Responsibility

The SFI *Certified Organization*, as the *Group Manager* and the *Group Member* have shared responsibility for and commitment to sustainable forestry practices on the land they own, manage or from which they procure raw material.

### 2.3 Efficiency

The *SFI Small Lands Group Certification Module* uses a *wood and fiber supply area* (“supply area”) approach to achieving sustainable forest management (e.g., planning or monitoring of forest resources) where the supply area approach is more suitable and efficient due to the limited size and resources of individual *landowners*. The results of the *wood and fiber* supply area approach must be consistent with and inclusive of the forest management practices implemented by individual *landowners* and/or resource/logging professionals. Lands certified to this module in the United States are certified to ATFS. Lands certified to this module in Canada are SFI certified.

## 3. REQUIREMENTS FOR MANAGEMENT OF THE GROUP

### 3.1 Responsibilities of the *Group Manager*<sup>2</sup>:

- 3.1.1 To ensure a commitment on behalf of the whole *Group Certification Organization* to establish and maintain practices and procedures in accordance with the requirements of this SFI Small Lands Group Certification Module.
- 3.1.2 To represent the whole *Group Certification Organization* in the certification process, including communications and relationships with the certification body, submission of an application for

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<sup>2</sup> The requirements for the management of the group are based on eligibility criteria of chapter 4.1.1-4.1.4 of Appendix 1 and Appendix 2 to Section 10. In cases where the requirements of this document differ from Appendix 1 to Section 10, the requirements of this document are definitive.

certification under this module and contractual relationship with the certification body.

- 3.1.3** To form a formal relationship with all *Group Members* based on a written agreement established directly between the *Group Manager* and each *Group Member* (every *landowner* and every *landowner agent*). The written agreement shall include<sup>3</sup>:
- The *Group Manager's* enumeration of the conditions of participation in the group and *group forest certificate*, including disclosure of *Group Members ineligibility to participate in an ATFS State program or IMG*;
  - The *Group Manager's* right and responsibility to implement and enforce any corrective or preventive measures, and to initiate the suspension of any *Group Member* from the scope of certification in the event of nonconformity with the requirements of the *SFI Small Lands Group Certification Module*;
  - The *Group Member's* commitment to comply with the requirements of the *SFI Small Lands Group Certification Module*;
  - The *Group Member's* agreement to participate and comply with the conditions of membership and forest management operations as recommended in the *wood and fiber supply area plan* (or their own conforming forest management, where applicable);
  - The *Group Member's* agreement to be included under the scope of the *Group Manager's group forest certificate*.
- 3.1.4** To establish procedures for inclusion of new *Group Members* within the *Group Certification Organization* including an internal assessment of conformity with the *SFI Small Lands Group Certification Module*, implementation of corrective and relevant preventive measures.
- 3.1.5** To establish procedures for expulsion of *Group Members* from the *Group Forest Certificate*, in cases of unresolved nonconformity, ownership transition or other circumstances, as appropriate, including documentation and timely reporting of decertification.
- 3.1.6** To maintain and achieve compliance with all requirements of the *SFI 2022 SFI Fiber Sourcing Standard* that outline relationship between the *SFI Certified Organization*, *landowners*, and resource/logging professionals; and management review and continuous improvement (Objectives 1, 2, 3, 6, 7, 10 and 11).
- 3.1.7** To establish written procedures for the management of the *Group Certification Organization* and clearly define and assign responsibilities for sustainable forest management and compliance with the certification requirements of this module.
- 3.1.8** To provide all *Group Members* with information and guidance needed for effective implementation and maintenance of practices and procedures in accordance with the requirements of this *SFI Small Lands Group Certification Module*<sup>4</sup>.
- 3.1.9** To ensure all *Group Managers* and *Landowner Agents* have been trained to implement the requirements of the module specific to AFF's Standards of Sustainability for Certification and section 4.3 Forest Management Practices. *Group Managers* and *Landowner Agents* shall attend an ATFS inspector training at least once during every Standards eligibility

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<sup>3</sup> While the written agreement is established directly between the *Group Manager* and each *Group Member*, trained *landowner agents* may facilitate and transmit written agreements between *Group Manager* and *landowner* members.

<sup>4</sup> The *Group Manager* should within the framework of Objective 3 (Use of Qualified Resource Professionals, Qualified Logging Professional and Certified Logging Companies), Objective 6 (Training and Education) and Objective 7 (Community Involvement and Landowner Outreach) of the *SFI 2022 Fiber Sourcing Standard* provide *Group Members* with information and guidance on the requirements of the *SFI Small Lands Group Certification Module* that are relevant to them and management operations on their land.

period. Training in accordance with section 4.3 Forest Management Practices may be accomplished through SFI Implementation Committees or other means.

**3.1.10** To keep records on:

- A. the SFI *Program Participant's* and the *Group Members'* conformity with the relevant certification requirements as spelled out by this Small Lands Module.
- B. all *Group Members*, including their contact details and, for *landowner* members, identification of their property and its/their sizes;
- C. the *certified area*;
- D. a record of operations carried out on the forest lands owned by the *Group Members* to support the internal monitoring program.
- E. the implementation of an internal monitoring program, its review and any preventive and/or corrective measures.
- F. the *wood and fiber supply area* plan as defined in 4.1, and the individualized goals and strategies for *landowners*, and/or the individual landowner management plan as defined in 4.2, as applicable.
- G. In the US, *Group Managers* share records of items A, B, C and E at least annually with AFF for documentation in the ATFS database to enable verification of the certified status of the *certified area*. In Canada, *Group Managers* share records of items A, B, C and E at least annually with SFI.

**3.1.11** To maintain an annual internal audit or monitoring program sufficient to ensure conformance with the requirements of the SFI Small Lands Group Certification Module<sup>5</sup> by the organization and individual *Group Members*. The *Group Certification Organization* must implement an annual monitoring protocol in accordance with the following:

- i. The sample size should be calculated based on the number of Group Members.
- ii. The size of the sample should generally be the square root of the number of Group Members, rounded up to the upper whole number.
- iii. Twenty-five percent of the sample should be selected at random.
- iv. The size of the sample may be adapted up or down by a standard taking into account the following:
  - results of a risk assessment
  - results of internal monitoring or independent audits
  - quality/level of confidence of internal annual monitoring
  - use of technologies allowing gathering of information for specific requirements
  - based on other means of gathering information about activities on the ground

**3.1.12** To operate a review of the conformity of *Group Members* based on results of internal audit and/or monitoring data sufficient to assess performance of the *Group Certification Organization* as a whole rather than at the individual *Group Member's* level<sup>6</sup>.

**3.1.13** To establish corrective and preventive measures if required and evaluate the effectiveness of corrective actions taken.

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<sup>5</sup> The internal audit/monitoring program should accommodate various verification and monitoring mechanisms required by the *SFI 2022 Fiber Sourcing Standard*.

<sup>6</sup> The review of the conformity and the corrective and preventive measures should be performed within the framework of Objective 10 of the *SFI 2022 Fiber Sourcing Standard* (Management Review and Continuous Improvement).

- 3.1.14** To communicate to the relevant *Certification Body* those *Group Members* with serious and continuing non-conformities that have not been resolved and that resulted in the *Group Member's* expulsion from the *group certification organization* based on the results of internal audits and/or the monitoring program.
- 3.1.15** To consider within its internal audit/monitoring program information from the *Group Member* on continuing non-conformities that have been found if the *Group Member* is part of another *group certification organization*.
- 3.1.16** For landowners in the United States, to maintain and update the members of the group organization and report to AFF or update the ATFS database to reflect entries and departures of *Group Members* from the *Group Organization*.

### **3.2 Responsibilities of the *Group Members*:**

- 3.2.1** To commit through a written agreement with the *Group Manager* to implement and maintain the relevant requirements<sup>7</sup> of the *SFI Small Lands Group Certification Module*;
- 3.2.2** To respond effectively to all requests from the *Group Manager* or a certification body for relevant data, documentation or other information whether in connection with formal audits or reviews or other requirements;
- 3.2.3** To provide full co-operation and assistance in respect of the satisfactory completion of audits, reviews, monitoring, relevant routine inquiries or corrective actions; and
- 3.2.4** To implement relevant corrective and preventive actions required by the *Group Manager*.
- 3.2.5** To inform the *Group Manager* of any continuing non-conformities if the *Group Member* is part of another *group certification organization*.

## **4. REQUIREMENTS FOR SUSTAINABLE FOREST MANAGEMENT**

The *Group Manager* shall ensure compliance of the *Group Certification Organization* with the requirements outlined in *SFI 2022 Fiber Sourcing Standard*<sup>8</sup> and the following additional requirements outlined in 4.1 the *Wood and Fiber Supply Area Plan* and 4.3 *Forest Management Practices on Certified Area*.

### **4.1 Wood and Fiber Supply Area Plan**

The *Group Manager* shall develop and update a *wood and fiber supply area* plan that adequately covers the fiber procurement area by the *Group Certification Organization*. The plan shall:

- 4.1.1** Be based on a long-term resource analysis including periodic or ongoing forest inventory, mapping and monitoring of forest resources; and include or be based on analysis of social, environmental and economic impacts of forest operations on forest resources;
- 4.1.2** Promote the maintenance and enhancement of the quantity of forest resources. Promote afforestation of agricultural and treeless land into forests. Identify risks of conversion of forests to non-forest uses and measures to mitigate this risk.
- 4.1.3** Be consistent with applicable legislation and land-use plans;
- 4.1.4** Include a description of forest resources, their different uses and functions, and objectives for their management;

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<sup>7</sup> The *Group Manager* should within the framework of Objective 3 (Use of Qualified Resource Professionals, Qualified Logging Professional and Certified Logging Companies), Objective 6 (Training and Education) and Objective 7 (Community Involvement and Landowner Outreach) of the *SFI 2022 Fiber Sourcing Standard* provide *Group Members* with a specific list and guidance on the requirements of the *SFI Small Lands Group Certification Module* that are relevant to them and management operations on their land.

<sup>8</sup> This list and guidance also includes Interpretations for the Requirements for the *SFI 2022 Standards and Rules* relevant to the *SFI 2022 Fiber Sourcing Standard* or to the additional requirements.

- 4.1.5 Include analysis and determination of long-term sustainable harvest levels by monitoring *growth and drain* trends across the *wood and fiber supply area*. The monitoring system shall identify trends and develop forest management activities, on the *certified area*, to promote sustainable harvesting levels on the *wood and fiber supply area*.
- 4.1.6 Include a review of non-timber activities and opportunities (e.g., conservation of soil, air and water quality, carbon, biological diversity, wildlife and aquatic habitats, recreation and aesthetics); and sustainable management and use of those non-timber forest products that are affected by forest management practices;
- 4.1.7 Review results of monitoring of harmful agents, such as environmentally or economically undesirable wildfire, pests, diseases, invasive exotic plants and animals and list or provide information on measures to protect forests from those agents to maintain and improve long-term forest health, productivity and economic viability;
- 4.1.8 Include identification and mapping of sensitive sites and areas with high biodiversity values on the *certified area* and the *wood and fiber supply area*;
- 4.1.9 Include identification and mapping of areas with specific water and soil protection functions, including steps to ensure their protection, maintenance and enhancement of their protective functions;
- 4.1.10 Include description of appropriate silviculture and regeneration methods to achieve forest management objectives identified in 4.1 and 4.3;
- 4.1.11 Be made available to the relevant *landowners* and/or *landowner agents* and provide the basis for the SFI *Certified Organization's* verification, internal audit or monitoring program<sup>9</sup>;
- 4.1.12 Be made publicly available, except confidential business and personal information and other information made confidential by legislation or for the protection of cultural sites or sensitive natural resources.
- 4.1.13 Identify *landowner* goals and strategies and silviculture for achieving those goals to be applied to each individual *landowner* appropriate to the size, scale and intensity of small lands certified via the module.

## 4.2. Group Member's Management Plan

*In the event that a landowner, or landowner agent, opts to have and implement a written forest management plan for an individual group member, it shall be consistent with the size of the ownership and the scale and intensity of the forest activities.*

- 4.2.1 Management plan shall be active, adaptive and embody the *landowner's* current objectives, remain appropriate for the land certified and reflect the current state of knowledge about natural resources and sustainable forest management.
- 4.2.2 Management plan shall:
  - a. Describe current forest conditions, *landowner's* objectives, management activities aimed at achieving *landowner's* objectives, document a feasible strategy for activity implementation and include a map accurately depicting significant forest-related resources.
  - b. Demonstrate consideration of the following resource elements: forest health, soil, water, wood and fiber production, threatened or endangered species, special sites, invasive species and Forests of Recognized Importance<sup>10</sup> (in the United States) or *Forests with*

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<sup>9</sup> The Objective 3 (Use of Qualified Resource Professionals, Qualified Logging Professional and Certified Logging Companies), Objective 6 (Training and Education) and Objective 7 (Community Involvement and Landowner Outreach) of the *SFI 2022 Fiber Sourcing Standard* provides a framework for communicating the content of the forest management plan or its relevant parts to *landowners*, resource and logging professionals and for its on-the ground implementation.

<sup>10</sup> Globally, regionally and nationally significant large forest landscape areas of exceptional ecological, social, cultural or biological values. These forests are evaluated at the landscape level, rather than the stand level, and are recognized for a

*Exceptional Conservation Value* (in Canada). Where present and relevant to the property, the plan shall describe management activities related to these resource elements.

- c. Where present, relevant to the property and consistent with *landowner's* objectives, the plan preparer should consider, describe and evaluate the following resource elements: fire, wetlands, desired species, recreation, forest aesthetics, biomass and carbon.

- 4.2.3 The *Landowner* or *landowner agent* should monitor for changes that could interfere with the management objectives as stated in management plan. When problems are found, reasonable actions are taken.

### **4.3 Forest Management Practices on *Certified Area***

The *Group Manager* shall ensure through a *verifiable monitoring system* that:

- 4.3.1 *Landowner* shall comply with all relevant federal, state, provincial, county and municipal laws, regulations and ordinances governing forest management activities.
- 4.3.1.1 *Landowner* shall comply with all relevant laws, regulations and ordinances and will correct conditions that led to adverse regulatory actions, if any.
- 4.3.1.2 *Landowner* should obtain advice from appropriate qualified natural resource professionals or qualified contractors who are trained in, and familiar with, relevant laws, regulations and ordinances.
- 4.3.2 Reforestation or afforestation shall be achieved by a suitable process that ensures adequate stocking levels.
- 4.3.2.1 Reforestation or afforestation shall achieve adequate stocking of desired species reflecting the *landowner's* objectives, within five years after regeneration harvest, or an appropriate time frame for local conditions, or within a time interval as specified by applicable regulation.
- 4.3.3 *Landowner* shall meet or exceed practices prescribed by state or provincial forestry best management practices that are applicable to the property.
- 4.3.3.1 *Landowner* shall implement specific state or provincial forestry best management practices that are applicable to the property.
- 4.3.3.2 *Landowner* shall minimize road construction and other disturbances within riparian zones and wetlands.
- 4.3.4 *Landowner* shall consider a range of forest management activities to control pests, pathogens and unwanted vegetation.
- 4.3.4.1 *Landowner* should evaluate alternatives to pesticides for the prevention or control of pests, pathogens and unwanted vegetation to achieve specific management objectives.
- 4.3.4.2 Pesticides used shall be approved by the Environmental Protection Agency (EPA) in the United States or the Pest Management Regulatory Agency (PMRA) of Health Canada, and applied, stored and disposed of in accordance with EPA or PMRA approved labels and by persons appropriately trained, licensed and supervised.
- 4.3.5 When used, prescribed fire shall conform with *landowner's* objectives and all applicable rules, laws, and regulations.
- 4.3.6 Prescribed burns shall conform with the *landowner's* objectives and state and local laws and regulations. Forest management activities shall protect habitats and communities occupied by threatened or endangered species as required by law.
- 4.3.6.1 *Landowner* shall confer with natural resource agencies, state or provincial natural resource heritage programs (i.e., NatureServe databases), qualified natural

resource professionals or other current sources of information to determine occurrences of threatened or endangered species on the property and their habitat requirements.

- 4.3.6.2 Forest management activities shall incorporate measures to protect identified threatened or endangered species on the property.
- 4.3.7 *Landowner* should address the desired species and/or desired forest communities when conducting forest management activities, if consistent with *landowner's* objectives.
  - 4.3.7.1 *Landowner* should consult available and accessible information on management of the forest for desired species and/or forest communities and integrate it into forest management.
- 4.3.8 *Landowner* should make practical efforts to promote forest health.
  - 4.3.8.1 *Landowner* should make practical efforts to promote forest health, including prevention, control or response to disturbances such as wildland fire, invasive species and other pests, pathogens or unwanted vegetation, to achieve specific management objectives.
- 4.3.9 Where present, forest management activities should maintain or enhance Forests of Recognized Importance (in the United States) or Forests with Exceptional Conservation Value (in Canada).
  - 4.3.9.1 Appropriate to the scale and intensity of the situation, forest management activities should incorporate measures to contribute to the conservation of identified Forests of Recognized Importance (in the United States) or *Forests with Exceptional Conservation Value* (in Canada).
- 4.3.10 *Landowner* should manage the visual impacts of forest management activities consistent with the size of the forest, the scale and intensity of forest management activities and the location of the property.
  - 4.3.10.1 Forest management activities should apply visual quality measures compatible with appropriate silvicultural practices.
- 4.3.11 Forest management activities shall consider and maintain any special sites relevant on the property.
  - 4.3.11.1 *Landowner* shall make a reasonable effort to locate and protect special sites appropriate for the size of the forest and the scale and intensity of forest management activities.
- 4.3.12 *Landowner* should use qualified natural resource professionals and qualified contractors when contracting for services.
  - 4.3.12.1 *Landowner* should seek qualified natural resource professionals and qualified contractors.
  - 4.3.12.2 *Landowner* should engage qualified contractors who carry appropriate insurance and comply with appropriate federal, state, provincial and local safety and fair labor rules, regulations and standard practices.
  - 4.3.12.3 *Landowners* should retain appropriate contracts or records for forest product harvests and other management activities to demonstrate conformance to the Standards.
  - 4.3.12.4 *Landowner* or designated representative shall monitor forest product harvests and other management activities to ensure they conform to their objectives.
  - 4.3.12.5 Harvest, utilization, removal and other management activities shall be conducted in compliance with the *landowner's* objectives and to maintain the potential of the property to produce forest products and other benefits sustainably.

## Small Lands Group Certification Module: Guidance for Implementation – April 2021

### Introduction

This guidance document supports implementation of the Small Lands Group Certification Module (the Module). This jointly developed program of the Sustainable Forestry Initiative (SFI) and American Forest Foundation (AFF) is built on the foundation of SFI's 2022 Fiber Sourcing Standard, and the AFF 2021-2026 Standards of Sustainability for certification under the American Tree Farm System. The guidance below applies only to the application of this Small Lands Group Certification Module and may depart from guidance or interpretations that apply to the SFI 2022 Fiber Sourcing Standard or the AFF 2021-2026 Standards of Sustainability.

Recognizing the dynamic nature of worldwide trends in third-party certification and sustainability assurances as well as the need for periodic re-evaluation of this program's alignment with SFI's and AFF's strategic direction, either organization may, at any time, choose to pursue modifications to the module or its terms of implementation. If modifications are desired, module users will be notified by SFI of the intent, process, timeline, and potential impacts to program delivery.

### Guidance

The following guidance is structured in the form of frequently asked questions about Module implementation. Interested parties are strongly encouraged to consult the full Module text located at [insert hyperlink] prior to notification of SFI/AFF of intent to implement the module.

#### 1. Do I need to notify SFI and AFF if I want to use this Module?

Yes. If you are an SFI Certified Organization certified to the SFI 2022 Fiber Sourcing Standard, please notify both Leigh Peters at AFF ([lpeters@forestsfoundation.org](mailto:lpeters@forestsfoundation.org)) and Gregor Macintosh at SFI ([gregor.macintosh@forests.org](mailto:gregor.macintosh@forests.org)) of your intent to implement the Small Lands Group Certification Module. This will enable AFF and SFI to provide your organization with technical support and resources to support implementation of the Module, as well as tools for reporting and other functions.

#### 2. What if a landowner decides to sell their property?

When a landowner sells their property, it is no longer under the scope of the certificate and would need to be updated in the ATFS and/or SFI database.

#### 3. Is a landowner's time in the group certification limited?

No. The Small Lands Group Certification Module does not specify a minimum or maximum timeline for which a landowner must be enrolled in the group, recognizing this decision rests entirely with the landowner, as personal circumstances or preferences of landowners change. Similarly, SFI Certified Organizations may wish to transition a landowner out of certification in their group for some reason. Through the Small Lands Group Certification Module, SFI Certified Organizations - as group managers - and landowners both commit to sustainable forestry, including ensuring that critical practices such as reforestation are supported and verified under this certification. If there is a desire by a participating landowner, or the SFI Certified Organization Group Manager to transition lands out of the group, the Certified Organizations should notify AFF such that AFF can provide that landowner with ongoing resources and support to encourage long-term stewardship.

#### 4. Can a landowner be in multiple groups?

No. To ensure accurate certification information and to avoid "double counting" of certified acres and landowners, a particular parcel may only be enrolled in one certification at a time, via the Small Lands Group Certification Module, an ATFS Independently Managed Group (IMG) or ATFS State Programs. Group Managers in the United States must check the ATFS Verification Database and [SFI Database](#) before enrolling a parcel in their group to ensure that it is available to join their group. Group Managers wishing to transition landowners from a State ATFS Program or IMG to a module must do so with landowners' full consent and must notify both the State Program Administrator/IMG Manager *and* AFF's ATFS Certification Manager of their intent to do so. Group Managers must maintain and update members of the group organization and report to AFF or update the ATFS database to reflect entries and departures of Group Members from the Group Organization.

**5. Can a company have a Wood and Fiber Supply Basin Plan that is different from a nearby competitor's?**

Yes. The Small Lands Group Certification Module requires a Wood and Fiber Supply Basin plan, encompassing all required elements enumerated in Module sections 4.1 and 4.2. Each SFI Certified Organization may develop their own such plan reflecting their supply basin, operations and analyses, which may differ from any neighboring facility or competitor. These plans must be made publicly available, per the PEFC ST 1003-2018 requirement, excluding confidential, proprietary and personal information. In addition, SFI Certified Organizations may utilize Landscape Management Plans (LMPs) developed by AFF and partners through multi-stakeholder processes, if they are available in the SFI Certified Organization's region of sourcing. If utilized, these LMPs would need supplemental information to address specific Module requirements, including growth and drain trends analysis and related management measures.

**6. Can an SFI Certified Organizations leverage activities undertaken by a SFI Implementation Committee (SIC) or American Tree Farm System (ATFS) State Committee in their implementation of the Module and management of their group?**

Yes. A Certified Organization may be able to gain some benefit of collective actions undertaken by an SIC or ATFS State Committee, while observing antitrust laws and regulations. This may include development of Wood and Fiber Supply Basin Plans elements, monitoring efforts or use of landowner education materials.

**7. How would this Module be audited for an SFI Certified Organization with multiple sites?**

This module uses a sampling procedure similar to and designed to complement a multisite SFI 2022 Fiber Sourcing Standard audit but includes guidelines for sampling of landowners and landowner agents. These guidelines are in SFI Section 10 - SFI 2022 Audit Procedures and Auditor Qualification and Accreditation, Appendix 1, Audits of Multisite Organizations.

**8. ATFS has not historically allowed loggers to conduct inspections and certifications. But, this Module allows that. How can we ensure integrity of the ATFS Standard is upheld? What safeguards are in place?**

The Small Lands Group Certification Module enables *landowner agents* including loggers, contractors, wood dealers and other qualified resource professionals to carry out evaluations of properties to evaluate eligibility of the property for entry into the certified group. However, there are several safeguards in place. First, all landowner agents must be trained to participate in the group (specified by sections 3.1.8 and 3.1.9). Next, because the SFI Certified Organization holds their own certificate, that SFI Certified Organizations is fully responsible for ensuring that the Module and the ATFS Standards encompassed in the module are fully conformed to, including through the actions of their *landowner agent* members. Further, any risks or adverse impacts associated with the actions of *landowner agents* within a company's group are fully contained within that Certified Organization's certificate and would not have an impact on the status of other certificates including other Small Lands Group Certification Module certificate holders, ATFS IMGs, ATFS State Programs, or the certification status of any other landowners certified through those certificates.

**9. Can this Module certify a portion of a parcel?**

This Module requires certification of an entire contiguous parcel. Contiguous parcels are discrete parcels that share a boundary line or corner point and are held under the same legal ownership name. A landowner may choose to certify only a portion of their entire property portfolio but may not exclude a portion of a contiguous parcel that does not meet the Small Lands Group Certification Module requirements.

**10. What happens to a Small Lands Module Group if a mill changes hands or a company's strategy changes?**

Recognizing that ownership of mills and companies, individual company strategies and market conditions are subject to change, SFI Certified Organizations are encouraged to develop policies and procedures that support the ongoing integrity of the established group, considering changing conditions. In the case that a company moves to dissolve a group, the SFI Certified Organization will notify and coordinate with AFF and SFI to provide landowner members with alternative certification options and ongoing resources and support to encourage long-term stewardship.

**11. How will interpretations of the Module be developed?**

As the need for interpretations arise, Small Lands Module Group Managers and Members should submit requests and questions to both Leigh Peters at AFF ([lpeters@forestfoundation.org](mailto:lpeters@forestfoundation.org)) and Gregor Macintosh at SFI ([gregor.macintosh@forests.org](mailto:gregor.macintosh@forests.org)). Interpretations will be jointly developed by AFF and SFI, reviewed by the AFF/SFI joint Task Group, and approved by both organizations' respective technical governance bodies before interpretations are made effective.