

# SFI Standards Revision Public Comment Survey

## Comments Received during May 1 – June 30, 2020, Second Public Comment Period

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The SFI 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 Sections were available for comment.

The SFI 2022 Standards, approved by the SFI Board of Directors April 15, 2021, were the result of input from comments submitted during the second public comment period which ran from May 1 – June 30, 2020.

Please direct any questions to Gregor Macintosh, SFI Senior Director, Standards. [gregor.macintosh@forests.org](mailto:gregor.macintosh@forests.org)

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Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
24	1	The PMs do not seem to require the avoidance of forest conversion. They require it to be considered thoughtfully and those lands then excluded from the scope.	"To ensure forest management plans include long-term sustainable harvest levels and that any forest conversion is justified, and such lands excluded from the scope of certification."	Conversion of forest cover types is addressed in PM 1.2. Conversion to non-forest is addressed in PM 1.3.
21	1	The Minnesota SIC recognizes the need to protect and enhance biological diversity at the landscape and local scales. However, the requirement to conduct a formal assessment on every conversion site is extremely onerous. The guidance document says, "The formality of the assessment has not been prescribed and therefore, Certified Organizations are able to structure the assessment in accordance with the scope and scale of their organization and scale of the intended conversion." There is a fine line between flexibility and ambiguity. When it is clearly stated that the Certified Organization has flexibility, and that it is their decision alone what to include in the assessment there is little room for an auditor to make additional demands. But when ambiguity is open for interpretation it leads to auditors determining on their own what level of detail they want in order to convince them that the Certified Organization has met the Standard.	Recommendation: Reduce ambiguity. Where there is flexibility, make it abundantly clear that the Certified Organization determines where to land within the continuum of possibilities allowed by that flexibility.	Comment addressed by PM 1.2 and SFI Section 7 - Conversion.



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22	1	<p>Objective 1 which promotes long term sustainable harvest levels and measures to avoid forest conversion fails to deliver on its goals. It aims to avoid converting one forest type to another, but allows loopholes which defeat the purpose. A main concern should be avoiding converting natural, native forests to less biologically diverse forests. But land managers may do that as long as they believe there is no long-term risk of broadly losing those forests and values within. Lands outside the ownership and beyond the landscape level can be credited to reduce this risk. Managers need to simply assess ecological impacts and provide justification. This is not a serious protection.</p> <p>Furthermore, forest lands within the certified management unit can be easily “scoped out” and sold with no regard as to whether those acres will be converted to non-forest use. A credible certification system would require a long-term commitment to forest values.</p>		<p>Comment addressed by PM 1.2 and SFI Section 7 Guidance - Conversion.</p> <p>Regarding lands outside the certificate being available for conversion to non-forest - all N American SFM schemes have this provision.</p>
23	1	<p>Canopy’s prior recommendations include clear prohibitions on the conversion of natural forests. The draft Standard’s approach to conversion remains similar to the existing Standard’s approach, with noteworthy but only partial restrictions that allow much conversion, and that do not attempt to rectify past</p>	<p>We recommend the Standard be revised to:</p> <ul style="list-style-type: none"> <li>Prohibit the conversion of forests to non-forest land uses.</li> <li>Consistently protect all natural forests from conversion to plantations.</li> <li>For</li> </ul>	<p>Comment addressed by PM 1.2 and SFI Section 7 Guidance - Conversion.</p> <p>Regarding banning the conversion of forest cover types after 1994,</p>



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		<p>conversions. As before, the Standard does not prohibit organizations from converting forests to non-forest land uses, which is arguably the most unsustainable land management practice possible. Instead, the Standard turns a blind eye by excluding converted areas from the scope of certificates. The draft Indicators also allow conversion of natural forests to plantations if it does not convert rare or “ecologically important” native forest types, cause native forests to become rare, or create “significant long term... impacts on FECV, old growth, forests critical to threatened or endangered species, or special sites.” These restrictions are important, but all natural forests should be protected from conversion to ecologically-simplified plantations. Especially in the United States, but also increasingly in Canada, most commercially managed natural forests are no longer FECV, old growth, or documented as having threatened or endangered species. The Guidance also allows for exemptions to these restrictions, i.e., where it is more profitable to convert “ecologically important” forest types. Equally important, the Standard is silent about existing plantations that replaced rare or ecologically important forests, FECV, old growth, or RTE species’ habitats.</p>	<p>existing plantations established through conversion of natural forests after 1994, require the land to be in the process of being restored to natural forest conditions, especially but not only if the conversion had affected rare or ecologically important forest types, FECV, old growth, or RTE species’ habitats.</p>	<p>there is no scientific reason for this and therefore the edit was not accepted.</p>
25	1.1	<p>Scope of the Forest Management Standard would seem to apply to certified organizations and possibly partner organizations as opposed to any organizations.</p>	<p>Change any organization to certified organization</p>	<p>1.1 Scope does reference Certified organizations</p>



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26	1.1	sustainability only refers to timber harvest – this is a major shortcoming – forest sustainability is not addressed – sustained yield tends to be calculated closer to the maximum sustained yield which is not consistent with sustainable forestry.		<p>The SFI definition for sustainability does address forest sustainability.</p> <p>sustainable forestry: To meet the needs of the present without compromising the ability of future generations to meet their own needs by practicing a land stewardship ethic that integrates reforestation and the managing, growing, nurturing, and harvesting of trees for useful products and ecosystem services such as the conservation of soil, air and water quality, carbon, biological diversity, wildlife and aquatic habitats, recreation, and aesthetics.</p>
27	1.1	biodiversity at the landscape level is vague and will garner a very broad array of answers – too broad to be useful – weakens the standard.		Comment considered but not adopted. Objective 4 still addresses biodiversity at the landscape level.



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28	1.1	definition of forest inventory system seems to address only components related to growth and yield – i.e., timber – there is no suggestion for requiring components for other values, especially those related to biodiversity.		PM 1.1 addresses the other components beyond strict growth and yield parameters.  The definition of <i>forest inventory</i> is specific to species composition, rates of growth and mortality. Inventory of other forest values is addressed in Indicator 1.1.1 a., d., and i., and Indicator 1.1.6.
29	1.1	I have heard individuals outside the forest industry question whether certified forestry operations are net emitters of CO2 or not. This seems implausible if certified companies are practicing sustained yield forestry, but I can only speak to the rigor of our own forest inventory system. To settle this argument once and for all, a useful indicator would be to have participants calculate their timberlands net flux of CO2 annually and also their projected 5 and 10 year net flux of CO2. This is a simple calculation if you know the volume of wood on the property and the volume of wood harvested.	Add the following primary indicator: a. Calculate the net flux of CO2 for the certified forest land for the current year and estimated flux in the subsequent 5 and 10 year periods.	Comment addressed with the new Objective 9 - Climate Smart Forestry.
30	1.1	PM 1.1 does not account for "drain"	at the end of the PM, insert "as modified by drain"	Yield' is synonymous with 'drain'.



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31	1.1	<p>This draft of the SFI Standard actually loosens the requirements around sustainable harvest, by changing from an inclusive list of requirements in 1.1.1 to “such as”. Additionally, the SFI Standard does not actually require adherence to sustainable harvest levels – only related documentation. To derive accurate sustained yield levels, standards should require:</p> <ol style="list-style-type: none"> <li>1) removal of sensitive areas not typically harvested (rare habitats and communities, riparian areas, special sites) and for which growth and volume should not figure into sustainability of harvest;</li> <li>2) removal of species from growth calculations that are a large component of the forest and do not have commercial value (e.g., tan oak in the Pacific Northwest);</li> <li>3) calculations of sustained yield by management units and forest types; and,</li> <li>4) timeframe for assessing sustained yield, with rationale.</li> </ol> <p>Without these types of provisions, certified landowners could be over-cutting within a given forest type or for an entire management unit over time.</p>	Revert to current 1.1.1, which requires all of the elements in the list. Furthermore, adopt a clear requirement to adhere to documented sustainable harvest levels. Adopt more specific language around sustained yield calculations (points 1-4 above) that provides further safeguards against overharvesting.	Comment addressed in Ind. 1.1.1.
4	1.2	Additional Requirements- I see no good reason that if you are a organization certified to the forest management standard with a fibre sourcing program that you must also conform to the SFI 2022 Fiber Sourcing Standard. Now that they are separate standards they should be left	Certified Organizations with fiber sourcing programs (acquisition of roundwood and field manufactured or primary-mill residual chips, pulp and veneer to support a forest	Edit considered but not accepted as it does not improve the requirement.



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		to hold value on their own. This requirement places prohibitive and unnecessary cost on organizations hoping to attain certification to the Forest Management Standard. Also please see similar comment of fibre sourcing page.	products facility), are encouraged to certify to the SFI 2022 Fiber Sourcing Standard.	
32	1.1.1	Change to "such as" from "including" weakens this important indicator significantly. In effect, all the listed items become optional. Required only if/when an individual auditor judges them "appropriate".	This wasn't broke. Don't fix it. "including" is better.	Addressed with Ind. 1.1.1.
33	1.1.1		For consistency between Section 1.5 and 1.6, I suggest editing indicator "d" to read: "d. biodiversity at the stand and landscape scales.	Edit considered but not accepted as it does not improve the requirement.
34	1.1.1	As above, insert new language related to drain	1.1.j - an understanding of the expected drain (regular and irregular) on the growth and yield using data from appropriate inventories"	Edit considered but not accepted as it does not improve the requirement.
54	1.1.1 and 1.1.4	By changing « including » for « such as”, this indicator become useless since all the elements listed become optional.	Should revert back to previous indicator and write "including".	Addressed with Ind. 1.1.1.
35	1.1.1.d	Biodiversity at a landscape scale is not an indicator on it's own	Suggest planning, or targets be included for this point	Edit considered but not accepted as it does not improve the requirement.
55	1.1.1 f	Do growth and yield models have to consider potential climate change impacts, e.g., are harvesting levels sustainable if they do not	Clarify if growth and yield models have to account for climate change impacts	Addressed with Ind. 1.1.1. i.





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		consider the reduction in growth and yield of drought-susceptible species forecasted by the modeling		
36	1.1.1.f	Management planning should involve utilization of, rather than only access to G/Y modeling (as appropriate given size and scale of operation).	Replace "access to" with "utilization of" or "access to and utilization of".	Addressed with Ind. 1.1.1.f.
37 (duplicate of #36)	1.1.1.f	Management planning should involve utilization of, rather than only access to G/Y modeling (as appropriate given size and scale of operation)	Replace "access to" with "utilization of" or "access to and utilization of".	Addressed with Ind. 1.1.1.f.
38	1.1.1.i	The list of issues is a real 'mixed bag' and includes one issue (bioenergy feedstock) that may not fit well under the "non-timber" heading.	Revise list of non-timber issues to include only recreation, tourism, aesthetics and add "non-timber forest products". Remove bioenergy feedstock production and address separately along with other market developments. Create a separate sub-indicator to address pilot projects and economic incentive programs.	Edit considered but not accepted as it does not improve the requirement.
39	1.1.1.i	Current language does not appear to compel CO to actively consider "non-timber issues" in forest management planning	Replace "a review" with "consideration" or "review and consideration"	Addressed with Ind. 1.1.1 i.
40	1.1.3	clarify inventory and G/Y modeling us used for establishing harvest levels identified in the management plan	add "... is used to determine annual and periodic harvest levels."	Addressed with Ind. 1.1.3.
41	1.1.4	The frequency of periodic updates could be added.	The frequency of periodic updates could be added	Edit considered but not accepted as it does not improve the requirement.



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42	1.1.4	enhance list of considerations for updating inventory/harvest levels.	Add "natural disturbances (e.g. fire, insects, diseases)" and "market developments (e.g. new, expanding or declining markets or economic conditions)" as development to consider for periodic updates to inventory and planned harvest levels.	Edit considered but not accepted as it does not improve the requirement.
43	1.1.5	Seems to be missing a word like "activities"	Documentation of forest management activities(such as: planting , fertilization and thinning) consistent with assumptions in harvest plans.	Edit considered but not accepted as it does not improve the requirement.
44	1.1.5	there is a typo - "e" before "planting"	remove the "e" before "planting"	Noted.
53	1.1.6	Scope and scale of this Indicator could be clearer.	Add "...local and regional..." or similar language to provide clarity on the intended context of the assessment.	Addressed with Ind. 1.1.6.
46	1.1.6	The term "assessment" is used in this indicator (and elsewhere) and it is unclear what is entailed in this requirement. It is also unclear if this is a formal process or report, or whether this can be covered through multiple internal processes within an organizations broader management plan	Definition is required that allows the assessment to be formal or informal and may be identified as a stand alone process or covered through multiple processes within an organizations planning process.	Comment considered but Task Group decided not to define the term assessment.



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47	1.1.6	This this indicator is very broad and expectations from auditors will vary greatly.	Suggest: "Brief assessments of expected and known social, environmental and economic impacts of forest management operations contained in the forest management plan"	Addressed with Ind. 1.1.6.
48	1.1.6	this new indicator is aspirational, but in reality not fully operationally feasible - particularly around the concept of assessing social impacts of forest management plan.	delete new performance measure 1.1.6	Edit considered but not accepted as it does not improve the requirement.
49	1.1.6	The performance measure is overly broad as such assessments are geographically specific and requirements for development of such assessments are difficult to capture in the broader Standards & Rule document. The Idaho SIC requests removal or significant refinement of the performance measure.		Addressed with Ind. 1.1.6.
50	1.1.6	The assessment should be more focused on key impacts, main groups impacted (right holders, local community, forest users). As stated the indicator open the door to much interpretation regarding the scope of the assessment needed.	recommend focusing on key impacts for rights holders, local communities and forest users.	Addressed with Ind. 1.1.6.
51	1.1.6	Tel que formulée, cette exigence sera difficile à intégrer aux mécanismes de planification forestière actuels. Le développement de nouveaux outils pourrait être requis.	Reformuler l'indicateur 1.1.6 : Évaluation Prise en compte des incidences sociales, environnementales et économiques des activités d'aménagement forestier prévues dans le plan d'aménagement forestier.	Addressed with Ind. 1.1.6.



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52	1.1.6	The 1.1 Performance Measures is about harvest levels and growth and yield models, yet, this indicator seems to encompass all social, economic, and environmental impacts of operations. The scope and breadth of this indicator seems out of line with the Performance Measure. This indicator is overly broad.	Assessment of the social, environmental and economic impacts of harvest levels.	Addressed with edit in Ind. 1.1.6. Aligns with PEFC ST 1003 requirement.
45	1.1.6	This is beyond what an individual organization should be doing. Business' of the scale to be certified start as a result of economic drivers and operate based upon jurisdictional rules. Relative to the suggested OR wording provided, it should not require participation.	Remove the indicator OR use "Certified participants will consider participation in reasonable requests evaluating regional impacts on social, environmental and/or economic impacts of forest management planning.	Edit considered but not accepted as it does not improve the requirement.
57	1.2	Thank you for updating the language from Program Participant to Certified Organization. This better reflects the rigors associated with becoming and maintaining certification as opposed to just participating.	Ensure Certified Organization is italicized and either capitalized or not, consistently, throughout the document.	Comment addressed - Certified Organization is a defined term and italicized throughout.
62	1.2	SFI should meet the PEFC interpretations of 8.1.4 – 8.1.6 and add clear, auditable language that prohibits further conversion within certified operations, certification of land that has been converted from natural forests to plantation, and conversion of forests to non-forest use		The requirements in PM 1.2 and PM 1.3 meet the PEFC requirements in 8.1.4 - 8.1.6 of PEFC ST 1003.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
63	1.2		PM 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 ecologically sound justification for longer term human well-being .	Comment addressed in PM 1.2.
65	1.2	We are alarmed to see that the proposed SFI standard continues to allow the conversion of forests into non-forest use including plantations, if the organization completes an “assessment” of the anticipated impacts first. While the standard indicates that conversion is not allowed in some instances (for example, forest types “critical to threatened and endangered species”), there is no evidence that these exceptions will be determined by peer-reviewed science, or in consultation with Indigenous and academic wildlife experts. In light of widespread, non-science-based industry claims that industrial logging is not harmful to threatened and endangered species, we are concerned that organizations will have enormous leeway to claim that they are meeting SFI’s threshold while continuing to put threatened and endangered species’ habitat at risk.		Conversion to a planted forest is not conversion to non-forest use. PM 1.2 addresses the comment.



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67	1.2	Would establishment or expansion of camping areas (recreational opportunities) be part of conversion and therefore exclusion from an SFI certification)? These might be de minimus on the landscape.		Comment is addressed in SFI Section 7 Guidance - Conversion. Recreational sites are not required to be removed from the scope of an SFI Forest Management certificate.
69	1.2	In the Lake States large areas of pine were harvested. We are now left with many off-site aspen, birch, and red maple sites. Is it acceptable to convert these off-site aspen, birch, red maple sites back to native red, white, and jack pine. I am under the assumption that this would be a re-introduction native species which are better suited for a site.		Comment addressed in PM 1.2.
70	1.2	One thing to be aware of is "native forest cover" is not a single definition. I believe it is actually two i.e. NATIVE and then FOREST COVER type. The Forest Cover Type's definition refers to the published document: Society of American Foresters Forest Cover Types of the United States and Canada (Eyre, 1980).		Comment addressed in PM 1.2., and the definitions of 'native' and 'forest cover types'.
71	1.2	As with the term "assessment" is SFI seeing this as a separate stand alone document or a process perhaps documented in an organizations broader management plan and systems as required in 1.1.6 and elsewhere		Comment addressed in PM 1.2 and the associated Guidance in SFI Section 7 - Conversion.
73	1.2	Can more guidance be provided for an assessment in FS 1.2.1 and 1.2.3?		Comment addressed with Guidance in SFI Section 7 - Conversion.



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56	1.2	PM 1.2 it is currently unclear within the standard which scales this applies. Is it intended that certified organizations conduct the two-filter approach to every site level decision for potential conversion. In cases where the conversion results in either a restoration, or successional conversion within the range of natural variability for the ecological community this seems to be unnecessarily restrictive. In fact it may discourage organizations from conducting projects which restore natural ecological communities. These types of conversions are very common place in many regions, particularly within the Lake States. For example, within Minnesota it is common practice to convert off-site conifer plantations back toward deciduous forest cover.	Update language of the PM so that conversions which result in restoration of ecological conditions or conversions which are only successional in nature, could do a tenure/ownership level assessment and justification.	Comment addressed in PM 1.2 and the associated Guidance in SFI Section 7 - Conversion.
58	1.2	All of the statements connecting here with "and" is concerning. There may be instances where a conversion is justified and only some of these indicators can be met. Plantings or conversions or cover type shifts for assisted migration or other climate change challenges comes to mind.	Use language other than "and," such as "or" or "one or more of the following."	Edit considered but not accepted as it does not improve the requirement.
59	1.2	Many conversions are between natural forest types native to that Native Plant Community. This is common practice. SFI is dictating that an assessment must be conducted on every site - a huge additional workload where there is little risk. Why couldn't we do one assessment for each common type of conversion?		Comment addressed in PM 1.2 and the associated Guidance in SFI Section 7 - Conversion.



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60	1.2	The fundamental problem I have here is that with or without management, stands in our native forests will transition from one forest cover type to another, through stand development processes, disturbance, and recovery. Also, the existing forest cover type reflects the stand's history, not its destiny. See also Guidance: "It is not the intent of Performance Measure 1.2 to limit activities that are of ecological benefit, such as returning a site to a historical forest cover type, responding to forest health concerns, or mitigating present or future environmental harm (e.g., climate change)."	"Program Participants shall not convert a native forest cover type to another forest cover type, without consideration of the ecological impacts of said conversion and a determination that any material ecological impacts are appropriately justified."	Comment addressed in PM 1.2 and the associated Guidance in SFI Section 7 - Conversion.
61	1.2	Il n'est pas réaliste de documenter chaque cas de conversion de peuplement. Il faut considérer la dynamique des peuplements et les essences indigènes potentielles sans devoir justifier chaque plantation qui diffère du peuplement récolté. Si une telle évaluation doit être réalisée, elle pourrait justifier l'ensemble des projets de nature similaire.	«Les organisations certifiées doivent éviter autant que possible de convertir un type de peuplement en un autre...»	Comment addressed in PM 1.2 and the associated Guidance in SFI Section 7 - Conversion.





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64	1.2	While the performance measure reads as if it is substantive, the indicators where the justification for conversion are detailed contain only narrow prohibitions related to conversion – provisions that relate to rare forest cover types and FECVs (imperiled and critically imperiled species and communities). These are not common on the landscape and allow for conversion in the vast majority of cases. SFI should add clear, auditable language that prohibits further conversion of natural forests within certified operations (thereby meeting PEFC interpretations as well).		Comment addressed in PM 1.2 and the associated Guidance in SFI Section 7 - Conversion. The standards requirements on conversion align with those in PEFC ST 1003.
66	1.2	RE: Conversions - Regeneration harvests often reset the successional clock whereby species that were once part of the later successional forest now become dominant. By forest typing methods it appears to be a conversion, although in reality both forest types are naturally-occurring on the successional continuum. Would this require applying the 2-filter justification?		Comment addressed in PM 1.2 and the associated Guidance in SFI Section 7 - Conversion.
68	1.2	Does SFI have a particular organization or source that it looks to as the expert for the classification of native forest types? How will changes to what is considered "native" be considered by certified organizations as vegetation changes due to climate change?		Comment addressed with SFI Section 7 Guidance - Conversion.



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72	1.2	Regarding the "off site" deciduous species in the Lakes states example, are they off site, or just an early seral stage? Also, conversion to the native pine species may no longer be suitable or practicable on all sites, given climate change is shifting the habitat range of many pine species north approximately 1 km per year.		Comment addressed in PM 1.2 and the associated Guidance in SFI Section 7 - Conversion.
74	1.2	Assessment is one thing, what about recommendations and where does all this go? Into the forest management plan? Should there be a link to reporting?		Comment addressed in PM 1.1 and PM 1.2 and the associated Guidance in SFI Section 7 - Conversion.
75	1.2	Le Gouvernement du Québec est à élaborer une stratégie nationale de production de bois. Cette dernière prévoit la création d'aires d'intensification de la production ligneuse (AIPL) en ayant recours notamment à des plantations à haut rendement. Ces plantations pourront dans certains cas être composées d'une seule espèce indigène. En l'absence de balises, ces secteurs soient classés par les auditeurs comme des conversions d'un type de peuplement forestier à un autre.	Définir au glossaire ce qu'on entend par "conversion".	Edit considered but not accepted as it does not improve the requirement. Task Group determined that PM 1.2 is sufficiently clear as written.
77	1.2.1	EACOM supports the 2 filter assessment determining ecological impacts and providing appropriate justification. Provides for flexibility to adapt to climate change e.g. use different tree species as seed zone migrate.		Noted.



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79	1.2.1	An explicit policy on not significantly altering the natural age class distribution is important. There is a statement about old growth but that is only part of the equation. Some forests (amount based on natural age class distributions) should be allowed to get old.	Recommend adding policy on not significantly altering the natural age class distribution	Edit considered but not accepted as it does not improve the requirement.
80	1.2.1	There might be an issue related to the baseline reference of 'native' as well as 'forest cover type'	1) 'Native' and 'forest cover type' could be defined separately. 2) Clarify what is considered native in terms of baseline reference (e.g. preindustrial or other).	Terms are defined and separate. See SFI Section 14 - Definitions.
85	1.2.1	Sub c. under Indicator 1 does not belong here.	Delete c. Move concept to Indicator 2.	Edit addressed with PM 1.2.
78	1.2.1	We are very concerned about the focus on type conversions and the amount of work being dictated by what we consider to be a fairly common forest management practice. There are many reasons to convert from one forest type to another. The most common is when doing final harvest on a stand that has reached the end of the successional continuum (e.g., spruce/fir/aspen) and a regeneration harvest resets the successional clock (e.g., aspen). Both stands are appropriate to the site according to our Native Plant Community guides. Other cases are where red pine is planted after jack pine harvest, and both are appropriate to the site. Many conversions are for the restoration of a preferred native forest (e.g., white pine). While the Guidance section says it is not the intent of	Recommendation: Allow conversions between forest types that are within the range of natural variability of the site's Native Plant Community and require no assessment. Another less preferable option would be for Certified Organizations to perform one assessment of routine cover type conversions they can expect to perform on their lands, and subsequent conversions are then covered by those assessments.	Comment addressed with PM 1.2 and SFI Section 7 Guidance - Conversion.



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		<p>this PM to limit activities such as this, the reality is that the onerous assessment process will indeed limit this activity. Lastly, not harvesting forests leads to conversion through succession. Does this Standard demand an assessment for those situations? If not, it should, as one of the most imperiled habitats in the US is the young forest. This Standard would be yet another barrier to creating young forest habitat for the wide array of wildlife dependent upon it. As written, the new Standard will require the two-step assessment and consultation for conversion at every single site. This is patently UNACCEPTABLE as it is a considerable amount of work for a relatively common practice with little impact. The broad-reaching assessment of ecological impacts, consultation and justification is unwarranted when converting from one native, natural forest cover to another.</p>		
81	1.2.1	<p>1.2.1.c includes objectives for long-term outcomes that support maintaining native forest cover types and ecological function... how do you envision accomplishing this?</p>		<p>Comment addressed with PM 1.2 and SFI Section 7 Guidance - Conversion.</p>



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
82	1.2.1		<p>1.2.1 Certified Organizations shall not convert one forest cover type to another forest cover type, unless the conversion:</p> <ul style="list-style-type: none"> <li>a. does not convert native forest cover types that are rare, ecologically important, or which put any native forest cover types at risk of becoming rare;</li> <li>b. does not create significant long-term adverse impacts on Forest with Exceptional Conservation Value, old growth forests, forest critical to threatened and endangered species, special sites, or ecologically important non-forest ecosystems;</li> <li>c. includes objectives for long-term outcomes that support maintaining native forest cover types and ecological function; and</li> <li>d. is in compliance with relevant national and regional policy and legislation related to land use and forest management.</li> </ul>	Edit addressed with Ind. 1.2.1.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
83	1.2.1	The wording could be improved as it creates confusion, too many negatives in the sentence. The indicator says: "organizations shall not convert one forest cover type to another forest cover type unless the conversion" and the first sentence of the bullet a. "does not convert".	Depends on the intent of the indicator	Comment considered but not accepted as it does not improve the requirement.
84	1.2.1.	We are really talking about the conversion of native forests, right? Not swapping plantation species?	"Certified Organizations shall not convert a native forest cover type to another forest cover type, unless the conversion:"	Edit considered but not accepted as it does not improve the requirement.
76	1.2.1 a	This may be problematic for assisted migration and changes to cover types in forests due to climate change.	Perhaps there should be an "or" at the end of the list adding in "is in compliance with relevant local policy related to climate change adaptation and mitigation strategies.	Edit considered but not accepted as it does not improve the requirement. List is intended to be inclusive.
87	1.2.1.a	We understand the desire to make conversion more robust, but the inclusion of "ecologically important" has potential to elevate the bar unreasonably. The definition of "ecologically important" is flawed as well.	delete reference to "ecologically important" - there are ample safeguards and tests without this. "...rare or which do not put any native forest cover types..."	Edit considered but not accepted as it does not improve the requirement.
88	1.2.1.b	Need to provide clarification on what constitutes "significant" either here in the Objective/Indicator or in the guidance.		Comment addressed SFI Section 7 Guidance - Conversion.
89	1.2.1.b	The definition of "Long term" is one rotation length or longer, which could extend over decades. "Significant" impacts to FECV could occur in shorter periods of time.	Delete "long term".	Edit addressed with Ind. 1.2.1.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
114	1.2.1 b		Change "Forest" to "Forests"	Edit considered but not accepted as it does not improve the requirement.
90	1.2.1.c	Please define "ecological function" It doesn't seem to be in the definitions or guidance. Alternatively, remove from the indicator.		Edit considered but not accepted as it does not improve the requirement.
91	1.2.1.c	Current language refers only to "long term" outcomes, which could inadvertently be interpreted to mean near term outcomes for maintaining native forest types and ecological function are not important.	Add "near term and ...(long term)"	Edit considered but not accepted as it does not improve the requirement.
115	1.2.1d	This sub-indicator is redundant to Objective 10 and could be removed.		Comment considered but not accepted as it does not improve the requirement.
86	1.2.1.1	"Rare" is a key term in this indicator and is not defined.	Include a definition of "Rare" or "rare forest type" in Section 14 SFI Definitions.	Edit considered but not accepted as it does not improve the requirement.
92	1.2.2	Change "any" to "a" and add back in reference to landscape level scale for assessment	A proposed conversion deemed appropriate per 1.2.1, and which has considered impacts relative to scale, may be implemented subject to a	Edit addressed with Ind. 1.2.2.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
			<i>landscape</i> assessment that considers:	
93	1.2.2	Concern with the use of "credible science" and potential interpretations.	Replace with "Best scientific information" to be consistent with other indicators and define the term in the glossary.	Edit addressed with Ind. 1.2.2.
94	1.2.2	Replace "credible science" to be consistent with other indicators ( as example: PM 4.1.1, 4.1.2, 9.1.1)	"Best scientific information", and define the term in the glossary.	Edit addressed with Ind. 1.2.2. The term best scientific information is a defined term. See SFI Section 14 - Definitions.
95	1.2.2	Note says "Staff developed guidance regarding appropriate stakeholder consultation" -- is this incorporated or available somewhere? On page 131, this is discussed but not presented as "guidance."	Add the "guidance regarding appropriate stakeholder consultation" to the standards, or link to where it is located (for instance, if it gets fleshed out in Section 7).	Comment addressed SFI Section 7 Guidance - Conversion.
96	1.2.2	...issues such as pests or pathogens,	Recommend changing to: "...issues such as pests,..."	Edit considered but not accepted as it does not improve the requirement.
98	1.2.2	If we were to have a permissible conversion to due an unintentional failed regeneration, then we have to undertake this expansive assessment? That seems unnecessary. Only intentional conversions should fall under this Indicator.	Keep old language that includes the word "intend"	Comment addressed with Ind. 1.2.1 and SFI Section 7 Guidance - Conversion.





Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
99	1.2.2	Entirely restated Indicator 2:	2. For contemplated forest type conversions allowed under 1.2.1, Certified Organizations shall consider the ecological impacts relative to scale, and such conversions may be implemented if the forest type conversion:	Edit considered but not accepted as it does not improve the requirement.
100	1.2.2		a. is a consequence of or emulates stand development and disturbance patterns in natural forest cover types in the region;	Edit considered but not accepted as it does not improve the requirement.
101	1.2.2		b. is an appropriate response to address forest health issues such as pests or pathogens, or proactive consideration of anticipated impacts of fire or climate change, reforestation challenges, or riparian protection needs; or	Edit considered but not accepted as it does not improve the requirement.
102	1.2.2		c. is part of an integrated plan to responsibly increase forest productivity.	Edit considered but not accepted as it does not improve the requirement.
103	1.2.2		Prior to implementation of forest type conversions under b. or c., the Certified Organization shall undertake an assessment that:	Edit considered but not accepted as it does not improve the requirement.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
104	1.2.2		i. considers site productivity , economics, and/or stand quality;	Edit considered but not accepted as it does not improve the requirement.
105	1.2.2		ii. considers ecological impacts of the conversion at the site and landscape scale, as well as any appropriate mitigation measures;	Edit considered but not accepted as it does not improve the requirement.
106	1.2.2		iii. undertakes appropriate consultation with local communities, Indigenous People, and other stakeholders who could be affected by such activities; and	Edit considered but not accepted as it does not improve the requirement.
107	1.2.2		iv. includes objectives for long-term outcomes that support maintaining native forest cover types and ecological function.	Edit considered but not accepted as it does not improve the requirement.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
97	1.2.2		1.2.2 Any proposed conversion deemed appropriate per 1.2.1, and which has considered impacts relative to scale, may be implemented subject to an assessment that considers: a. a response to address forest health issues such as pests or pathogens, or proactive consideration of anticipated impacts of fire or climate change, reforestation challenges, or riparian protection needs, provided that such justification is supported by credible science. b. site productivity, economics, and/or stand quality. c. ecological impacts of the conversion at the site and landscape scale, as well as consideration for any appropriate mitigation measures; and d. appropriate consultation with local communities, Indigenous People, and other stakeholders who could be affected by such activities.	Edit considered but not accepted as it does not improve the requirement.
117	1.2.2 a&b	The edits in track changes for a & b are reversed.		Noted.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
108	1.2.2.d	This is okay so long as the guidance (subject to easier changes) stays as written.		Comment addressed with SFI Section 7 Guidance - Conversion.
109	1.2.2.d	The assessment should address what kind of consultation with local communities is needed. If the assessment finds that no consultation is needed, then none needs to be conducted		Comment addressed with SFI Section 7 Guidance - Conversion.
110	1.2.2.d	Appropriate Consultation needs a definition in Section 14, even if just to direct the reader to Section 7		Comment addressed with SFI Section 7 Guidance - Conversion.
111	1.2.2.d	could be written for greater clarity	"...Consultation with appropriate local communities...."	Edit considered but not accepted as it does not improve the requirement.
112	1.2.2.d	A consultation with local communities, etc., seems unnecessary for the types of conversions mentioned above.	Keep old language that includes the word "intend"	Edit considered but not accepted as it does not improve the requirement.
113	1.2.2.d	.....appropriate consultation with local communities, Indigenous People, and other Stakeholders who could be affected by such activities. Does anyone know for sure who "could be" affected? The people that will be or are affected should be consulted but the "could be" reference is way to open ended and ambiguous.	"will be" or "are"	Edit considered but not accepted as it does not improve the requirement.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
116	1.2.2 d	We appreciate the flexibility within this indicator as written. We understand the guidance helps to define what "appropriate" is. It would be beneficial to add some of this context within the standard itself.	When a certified organization identifies significant concerns based on the extent, scale, or effects of a conversion they should conduct appropriate consultation...	Comment considered but not accepted as it does not improve the requirement.
118	1.3	Conversion to non-forest - Is there any limit to certified organizations converting certified lands to non-forest and then excising them from the certificate?	Suggest an annual limit on land conversion with and maximum certificate lifetime total something like no more than 1% per year with a lifetime maximum total of 5% of lands converted to non-forest can be excised from a certificate.	Comment addressed with SFI Section 7 Guidance - Conversion.
119	1.3	Under the new standard are you saying that forest products that originate from the development of large utility rights of ways could no longer be considered part of a certified mix?		PM 1.3 unchanged from SFI 2015-2019 Standard. See SFI Section 7 Guidance - Conversion of Forest Land to Another Land Use.
120	1.3.1	Suggest that this indicator language be broadened to include ecological restoration	Forest lands converted to other land uses shall not be certified to this SFI Standard . This does not apply to forest lands used for forest and wildlife management such as wildlife food plots or ecological restoration such as oak savanna or pine barrens or infrastructure such as forest roads, log processing areas, trails etc.	Comment considered but not accepted as it does not improve the requirement.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
8	1.4.3	Protection of Water Resources, since you're proposing adding protection of water quantity to the performance measure, do you want to also add water quantity here?	To protect water bodies and riparian areas, and to conform with forestry best management practices to protect water quality and quantity...	Edit addressed with 'Principles 1.4 - Protection of Water Resources' and Objective 3.
12	1.6	Forest land management Requirements- forest licensees benefit from including unmanaged forest reserves as part of their forest development plans (e.g., for biodiversity, ecosystem services values, etc. that offset the loss of such values in harvested areas). Therefore, future forest projections need to consider both managed and unmanaged forests, and apply fair analytical tools such as environmentally sensitive growth and yield models developed uniquely for the management regime in question, to estimate future attributes.		Comment addressed with Objective 1, and PM 1.1 - 1.4.
121	2	See first comment on inconsistent use of the term 'pests'	Recommend changing to: "...protecting forests from pests."	Comment addressed with edits to PM 2.2 and 2.4.
122	2	Objective 2: Forest Health and Productivity does not speak to forest disease and pests or invasive species; it mentions nothing of non-timber productivity; and, it is very weak on the influence of soil on productivity.		Comment addressed with edits to Objective 2.
123	2	...protecting forests from damaging agents.	Recommend changing to: "...protecting forests from pests."	Comment addressed with edits to PM 2.2 and 2.4.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
126	2.1.1	Le delay de regeneration peut être influencé par le gradient d'intensité de la sylviculture, par les scénarios sylvicoles retenus et même par les groupes de production prioritaires qui varient selon les régions du Québec. Dans certaines circonstances, la régénération peut atteindre les niveaux souhaités après plus de cinq années.		Comment addressed with Ind. 2.2.1 which does recognize that delays are possible for site-specific reasons.
124	2.1.1		Add regional between "specific" and "environmental"	Edit considered but not accepted as it does not improve the requirement.
125	2.1.1	As worded, the indicator suggests that for artificial regeneration, the norm should be planting within 2 years or seasons unless one of the exceptions (site specific environmental, forest health, or legal requirement) applies. Yet, in Michigan (and likely other lake states) a greater than 2-year delay in planting would be preferred for several reasons. First, it takes at least 1 full growing season and sometimes 2 for competitive vegetation to express itself on a site post-harvest. Therefore, in a standard sequence it's impossible meet the standard of reforestation within 2 planting seasons because site preparation and planting can't both be completed in the 2nd year. Second, site productivity and economic considerations often lead to large amounts of slash post-harvest which requires at least 2 years of decomposition prior to effective site prep.	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 or regional environmental or forest health considerations or legal requirements, through planting within three years or three planting seasons, or by planned natural regeneration methods within 5 years.	Edit considered but not accepted as it does not improve the requirement.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
127	2.1.3	replace "increase" with "cause a"	Plantings of exotic tree species should not <i>cause a</i> risk to native ecosystems.	Edit addressed with Ind. 2.1.3.
128	2.1.3	Wording issue. Seems to suggest that there was a previous baseline of risk that you would increase from.	Change to "Planting of exotic tree species should not pose a risk to native ecosystems.	Edit addressed with Ind. 2.1.3.
129	2.1.5	replace "a plan" with "an evaluation"	Any planned afforestation activity should include <i>an evaluation</i> that considers potential ecological impacts	Edit addressed with PM 1.4.
130	2.1.5		2.1.5 Any planned afforestation activity shall not convert or endanger ecologically important non - forest ecosystems , and address potential for negative, long - term ecological impacts of the planned afforestation should include a plan that considers potential ecological impacts of the selection and planting of tree species in non - forested landscapes.	Edit addressed with PM 1.4.
131	2.1.5	Wondering if it would be useful to include an example to clarify the intent? For example, imperiled or underrepresented non-forest ecosystems? Also, consider including "special sites" here to prevent disturbing cultural or historical sites.	Add "... for example imperiled or underrepresented ecosystems such as some native meadows and grasslands." Also add: "Afforestation activities must avoid disturbance of special sites"	Edit addressed with PM 1.4.





Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
			with geological, cultural or historic importance."	
133	2.2	Is fertilization considered to be a use of chemicals?		Yes - fertilizer is considered a chemical used in forestry operations.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
132	2.2	Canopy has previously recommended that chemical use be restricted and minimized across forests. The draft Standard's approach is largely unchanged, with narrow restrictions on the most toxic chemicals, and ineffective approaches to chemicals more generally. The draft Standard does include a new Indicator, 2.2.1, calling for Integrated Pest Management (IPM) to "be preferred." However, the idea of a preference is quite subjective. More fundamentally, the Standard's Definition of IPM does not prioritize non-chemical pest management or silvicultural practices that reduce the need for chemicals, and at best requires keeping "pesticides and other interventions to levels that are economically justified and reduce or minimize risks to human health and the environment." As before, other Indicators also call for use of chemicals to be minimized to meet "management objectives" – and inherently allow those objectives to include silvicultural and harvest systems that are chemical intensive. The Standard's prohibition on the most toxic chemicals is unchanged, with a focus on WHO Type 1A and 1B pesticides and those banned per the Stockholm Convention on Persistent Organic Pollutants. However, Indicator 2.2.5 allows use Type 1A and 1B pesticides "where no other viable alternative is available."	We recommend the Standard be revised to: <ul style="list-style-type: none"> <li>Require the use of chemical pesticides to be avoided and eliminated.</li> <li>Require that priority be given to non-chemical pest management, and silvicultural regimes that reduce the need for chemical inputs.</li> <li>Consistently prohibit the use of WHO Class 1A and 1B pesticides, and also prohibit use of Rotterdam Annex III chemicals, and Montreal Protocol chemicals, as well as carcinogens and chemicals containing dioxins or heavy metals.</li> </ul>	Comment addressed with PM 2.2 and SFI Section 7 Guidance - Prohibited Chemicals.
134	2.2.4	SFI allows the use of highly hazardous pesticides classified as 1A and 1B by the World Health Organization "where no other viable alternative		Comment addressed with PM 2.2 and SFI



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
		is available." Dangerous pesticides should not be permitted under any circumstances.		Section 7 Guidance - Prohibited Chemicals.
135	2.2.5	Wondering if there is variability in how this Indicator is applied in the context of the absence of "other viable alternatives"	See Guidance tab	Comment addressed with PM 2.2 and SFI Section 7 Guidance - Prohibited Chemicals.
136	2.2.8	Question for another section- perf measure 2.2 (chemical use), indicator 2.2.8.f. "Minimize drift" has been changed to "limit drift". This could be a matter of semantics, but one interpretation is that "limit" would allow for increased risk of potential impacts. In the next perf. measure 2.3 (soil productivity), the expression used is "minimize the loss". What is the difference, and why the change in language here?		Entire standard reviewed to ensure appropriate and consistent use of the terms 'limit' and 'minimize' and edits made accordingly.
137	2.2.8	Include use of PPE, spill kits and spill plans as appropriate management practices.	Add: "k. appropriate health and safety measures including use of personal protective equipment." and "l. Use of spill response plans and spill kits."	Edit addressed with Ind. 2.2.7 and Ind. 2.2.8.
138	2.2.8.f	replacing "minimize" with "limit" is unnecessary and does not accurately reflect what is being done operationally. Use of "minimize" appropriately and accurately reflects the necessary effort required by certified organizations to reduce the potential for drift as much as possible	"...buffer zones to minimize drift"	Edit considered but not accepted. Entire standard reviewed to ensure appropriate and consistent use of the terms 'limit' and 'minimize' and edits made accordingly.
139	2.2.8.g	Monitoring of water no, monitoring of safeguards yes.	"monitoring of water quality or safeguards...."	Edit addressed with Ind. 2.2.8 f.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
140	2.3		Replace "protect and maintain" with "maintain and promote"	Comment considered but not accepted as it does not improve the requirement.
142	2.3	None of the indicators will demonstrate the "soil health" of the site. Soil health requires measuring parameters such as bulk density, nematode populations, mycorrhizal fungi associations, and/or water infiltration. Is the intent of the SFI Standard to actually have certified organizations demonstrate soil health protection?	I think that the following edit should occur so that the indicators better align with the Performance Measure, or add indicators that measure soil health. Overstating what is being assessed undermines the credibility of the SFI Standard. Performance Measure 2.3. Certified Organizations shall implement forest management practices which protect and maintain forest and soil productivity and soil health.	Comment considered but not accepted as it does not improve the requirement.
143	2.3	the entire concept of "soil health" being called out seems another unrealistic operational expectation. Soil productivity is a measure for soil health. Actual structural changes to soil health can not be monitored or evaluated in any near term measure and indeed difficult at best even over a 30-50 year forest rotation. Suggest deleting all references to "soil health" throughout	"...Protect and maintain forest and soil productivity."	Edit addressed with PM 2.3.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
144	2.3	Adding soil health, especially with this definition, is no different from saying productivity. Soil health is a somewhat controversial topic and almost completely unquantifiable except through productivity, especially in production forestry. There is actually very little info from USDA-NRCS on maintaining "soil health" in forested systems, except through the current development of Forest Soil Management Interpretations. Oregon State University has excellent BMPs for PNW forestry: <a href="https://catalog.extension.oregonstate.edu/em9023">https://catalog.extension.oregonstate.edu/em9023</a>	Do not add the term "soil health."	Comment considered but not accepted as it does not improve the requirement.
141	2.3	Explicitly address prevention of damage to the residual stand.	Add indicator: "7. Protection of residual stand from material damage resulting from logging equipment and machinery, road building, landings and log decks, susceptibility to wind damage, etc."	Comment considered but not accepted as it does not improve the requirement. Edit addressed with PM 2.3.
145	2.3.1	Change the word to "disturbance" at the end of the sentence to "compaction". "Disturbance" does not equate to "compaction". For example "disturbance" could actually mitigate "compaction" if the disturbance was tilling.	Indicators: 1. Process to identify soils vulnerable to compaction, and use of appropriate methods, including the use of soil maps where available, to avoid excessive soil compaction disturbance.	Comment considered but not accepted as it does not improve the requirement.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
146	2.3.2	Use language similar to 2.3.1 re: identification of susceptible soils and point specifically to landslides.	Add "Process to identify soils vulnerable to landslides and erosion, and use of appropriate methods..."	Edit considered but not accepted as it does not improve the requirement.
147	2.3.3	The performance measure would benefit from being proactive and forward looking regarding the recruitment of downed wood. This can be done by changing the word "retained" to "retaining".	Performance Measure 2.3. Indicators: 3. Post-harvest conditions conducive to maintaining site productivity (such as: retaining ed down woody debris and minimized skid trails ).	Edit considered but not accepted as it does not improve the requirement.
148	2.3.4	Silviculture is the "art and science of controlling the establishment, growth, composition, health, and quality of forests and woodlands". Using the term "scientific" to qualify Silviculture is redundant. I suggest deleting "scientific" and change the word "standards" to "principles" to reflect the nomenclature of Forestry.	4. Retention of vigorous trees during partial harvesting, consistent with scientific silvicultural standards principles for the area.	Edit considered but not accepted as it does not improve the requirement.
149	2.3.5	Suggest deleting the term "soil health" or add specific indicators for actually assessing the soils' health. The indicators focus appropriately on soil productivity and the prevention of soil loss. Without specifying the indicators that assess soil health the inclusion of soil health is specious.	Ind. 5 Criteria that address harvesting and site preparation to protect soil productivity. and soil health.	Edit considered but not accepted as it does not improve the requirement.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
150	2.3.5	the entire concept of "soil health" being called out seems another unrealistic operational expectation. Soil productivity is a measure for soil health. Actual structural changes to soil health can not be monitored or evaluated in any near term measure and indeed difficult at best even over a 30-50 year forest rotation. Suggest deleting all references to "soil health" throughout	"...to protect soil productivity."	Edit considered but not accepted as it does not improve the requirement.
151	2.3.5	See above	Do not add the term "soil health."	Edit considered but not accepted as it does not improve the requirement.
152	2.3.5	Include timing, site conditions and equipment selection as a consideration for avoiding damage to soils	Add criteria that address ... "..." timing, site conditions, selection of appropriate equipment and machinery used for ..."	Edit considered but not accepted as it does not improve the requirement.
154	2.3.6		Ind. 6 Road construction, and skidding layout, and harvest plan designed to minimize impacts to soil productivity and soil health.	Edit considered but not accepted as it does not improve the requirement.
155 (duplicate of #150)	2.3.6	the entire concept of "soil health" being called out seems another unrealistic operational expectation. Soil productivity is a measure for soil health. Actual structural changes to soil health can not be monitored or evaluated in any near term measure and indeed difficult at best even over a 30-50 year forest rotation. Suggest	"...to minimize impacts to soil productivity."	Edit considered but not accepted as it does not improve the requirement.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
		deleting all references to "soil health" throughout		
156	2.3.6	See above. Also: 1. Harvest plan isn't defined. 2. What, specific measures would a harvest plan designed to minimize impacts to soil health include? What research supports that these are appropriate measures?	Do not add the term "soil health."	Edit considered but not accepted as it does not improve the requirement.
153	2.3.6	Please provide guidance on how soil health will be measured.		Comment addressed with SFI Section 7 Guidance - Soil Health.
157	2.4	Throughout the various sections of the report there is an inconsistent use of the terms "pests", "diseases", "insects and diseases", and "pathogens". For example, on pg 4 of this section of the clean report: "...undesirable levels of wildfire, pests, diseases, invasive species and other damaging agents...". The term pest is generally defined as any organism or damage agent designated as detrimental to effective resource management.	Recommend changing to: "...undesirable levels of wildfire, pests, and invasive species..."	Comment addressed with edits to PM 2.4.
158	2.4	See first comment on inconsistent use of the term 'pests'	Recommend changing to: "...undesirable levels of wildfire, pests, and invasive species..."	Comment addressed with edits to PM 2.4.
159	2.5	Clarify intent for the use of best scientific methods.	Add "... to meet management objectives and prevent ecological harm to native species and ecosystems."	Comment addressed with edits to PM 2.5.





Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
160	2.5.1	For organizations purchasing planting stock, is it sufficient to rely on the testing of the provider within the geographic region?	Program for ensuring appropriate research, testing, evaluation has or is occurring for the improved planting stock , including varietal seedlings, being used.	Edit considered but not accepted as it does not improve the requirement.
174	3	Objective 3 includes the phrase "through meeting or exceeding best management practices " which is also found in Performance Measure 3.1. This is an odd circular reference that suggests this section needs additional thought and editing. The Performance Measure 3.1, "through meeting or exceeding best management practices" should not be in the Objective. Typically, an Objective states the goal, in this case to protect water quality (see the proposed edit which provides a reasonable goal that isn't repeated as a Performance Measure or as a Indicator). The Performance Measures should clearly state the water quality and quantity parameters being protected. The actions that protect those parameters are the Indicators.	I suggest rewording the objective in the following way: Objective 3. Protection and Maintenance of Water Resources "To protect the water quality and water quantity of rivers, streams, lakes, wetlands and other water bodies from degradation by forest management activities. through meeting or exceeding best management practices	Comment considered but not accepted as it does not improve the requirement.
178	3	Leading with the word protect again.	"To meet or exceed best management practices, thereby protecting water quality and water quantity in rivers, streams, lakes, wetlands and other water bodies".	Comment considered but not accepted as it does not improve the requirement.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
179	3	To protect the water quality and water quantity of rivers, streams, lakes, wetlands and other water bodies through meeting or exceeding best management practices. I heard the explanations on the webinars and frankly feel this remains a confusion and a reach. I think “water quantity” could be replaced with sustainability which speaks more broadly to quality, quantity, and ecology than something as targeted and protecting quantity. I’ve been practicing over 30 years and feel comfortable protecting the sustainability of water resources. Protecting water quantity? We can leave buffers of varying widths, bridge every wet area, harvest only during dry times or snow cover and know we are doing our best to protect the sustainability of water resources and wetland ecosystems; however, if a drought hits and the water quantity drops in a nearby lake, river, or intermittent stream, that’s out of our control. The way this is written, the sting still comes back to the property manager.	"protect sustainability of water resources and wetland ecosystems"	Comment considered but not accepted as it does not improve the requirement.
161	3	The inclusion of "water quantity" seems to indicate that it is controllable in a definite sense. What would be the expected baseline and measures that might be expected from a certified organization? Given that inputs (precipitation) are beyond the control of certified organizations, it seems it doesn't belong.	suggest removing "quantity"	Edit considered but not accepted as it does not improve the requirement.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
162	3	lack of current guidance	concern on lack of guidance; in webinar, staff stated "no guidance yet, but working on..." Request opportunities for certified organizations to have ability to review as developed (since not developed prior to last public comment period)	Comment addressed with SFI Section 7 Guidance - Forest Management Impacts on Water Quantity.
163	3	Measures to address water quantity are not entirely under the control of forest managers. The Idaho SIC requests removal of "water quantity" in any performance measure of the Standards & Rule Revision.		Edit considered but not accepted as it does not improve the requirement.
164	3	What is the intent of adding water quantity to the FM standard? What is envisioned as acceptable program for its management?		Comment addressed with PM 3.2 and SFI Section 7 Guidance - Forest Management Impacts on Water Quantity.
165	3	The addition of Quantity was added to this objective. I am asking how is the landowner going to be asked to show conformance - I believe we will need some guidance and more definition around this addition, Will there be new expectations around laws and protection - provide clear ways to measure - This could have a big impact on management if this is not clearly defined or law changes in the future		Comment addressed with SFI Section 7 Guidance - Forest Management Impacts on Water Quantity.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
166	3	It is unclear what SFI is looking for with regarding to water QUANTITY.	None. But further clarification or guidance is needed.	Comment addressed with SFI Section 7 Guidance - Forest Management Impacts on Water Quantity.
167	3	Adding water quantity to Objective 3 is yet another new directive without justification that would greatly increase workload for Certified Organizations. There is no guidance on whether this means surface or ground water, actions that increase or decrease flows, or how to measure changes in water quantity resulting from forest management. We even questioned how this impacts the common practice of removing beaver dams that are flooding timber and eroding forest roads. Perhaps this is a western thing, as there is no shortage of water in the Lake States.	Recommendation: Remove the requirement to protect and maintain water quantity. Short of that, provide clear guidance on how to measure and track water quantity as it relates to forest management practices, keeping in mind the surfeit of new programs and additional workload the draft new Standards are imposing upon Certified Organizations.	Edit considered but not accepted as it does not improve the requirement.
168	3	Best Management Practices do not address "water quantity". Inclusion here is not logical. Delete "water quantity" here	"..water quality of rivers, streams..."	Edit considered but not accepted as it does not improve the requirement.
169	3	Best Management Practices do not address "water quantity". Inclusion here is not logical. Additionally, forest management activities designed to address water quantity are highly specific and inclusion in the Objectives amounts to setting a forest management objective for landowners. Delete "water quantity" here	Delete inclusion of water quantity in the Objective to read "..water quality of rivers, streams..."	Edit considered but not accepted as it does not improve the requirement.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
170	3	Provide context and guidance for how water quantity is impacted by and can be influenced by forest management practices. Currently, the Objective is written with the intent to "protect" surface water. A common side effect from timber harvesting is an increase in stream flow and a corresponding decrease in groundwater recharge, at least for a temporary period of time. The issue of water quantity in the context of forests is layered and multi-faceted. Should the Objective and associated PM's also address attenuation of increased flows and minimization of reductions in soil moisture and groundwater recharge? Guidance may also be required for CABs to ensure intent is consistently and accurately evaluated.		Comment addressed with SFI Section 7 Guidance - Forest Management Impacts on Water Quantity.
171	3	Groundwater and groundwater-surface water connectivity is a gap in Objective 3? This can be a critical hydrologic linkage between forested environments and the aquatic systems, particularly within the context of water quality and source water protection.	Better address groundwater and groundwater-surface water connectivity	Comment addressed with PM 3.2 and SFI Section 7 Guidance - Forest Management Impacts on Water Quantity.
173	3	Objective 3: Protection and Maintenance of Water Resources – best management practices are not nearly enough to ensure water quality or quantity. Do we know if BMPs are effective in doing what they were designed to do?		Comment addressed with PM 3.2 and SFI Section 7 Guidance - Forest Management Impacts on Water Quantity.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
176	3	I have reservations about including water quantity here. If the precipitation doesn't fall out of the sky, there's not much foresters' can do to influence water quantity. If downstream use is not regulated or at least prudent, forest harvests could be perceived by in some circles as the cause of, or contributing to water shortages.	Retain the wording from the 2015-2019 standard for Objective 3.	Comment addressed with PM 3.2 and SFI Section 7 Guidance - Forest Management Impacts on Water Quantity.
180	3	The majority of water quantity is driven by year over year precipitation amounts and is complicated by the geology the forest resides on. At the planning watershed scale (~10,000acres) vegetation has been identified as impacting water yield, but the results of differing silvicultural practices are obfuscated because of differences in water years. The USFS claims as an annual accomplishment the amount of water that runs off its lands, without in some cases doing any meaningful management activities, this is irritating and specious because that organization is simply taking credit for it raining. Obviously, managers have no influence on the rains, so this claim of producing this water is deceptive. How does SFI avoid appearing specious by taking credit for it raining on the certified land, when there are no water quantity indicators included in the standard? ----- It will be challenging to quantify the water quantity benefit of a particular Silvicultural system as part of SFI Certification compared to doing nothing so it is not clear how an SFI participant can make a claim for improving/protecting water quantity.	Suggest rewording the objective to delete water quantity, because the indicators have not been developed adequately. Or, circulate a more precise description of the objectives intent and a methodology for demonstrating how the protection of water quantity will be implemented. The water quantity indicators that would demonstrate meeting a water quantity objective need further development through paired watershed studies. This could be supported by the SFI Conservation Grant program. I suggest rewording Objective 3 in the following way: Objective 3. Protection and Maintenance of Water Resources "To protect the water quality and water	Comment addressed with PM 3.2 and SFI Section 7 Guidance - Forest Management Impacts on Water Quantity.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
		<p>If it is not feasible to quantify a water quantity benefit or specify one or more water quantity protective measures, why is water quantity being developed as a metric?----- The standard should acknowledge the enormous amount of water running off of the land naturally, in order to highlight the tremendous public benefit forest owners provide through their diligent protection of that quantity of water from degradation. This accurately represents the stewardship that SFI Certified Organizations are committed to through their certification, but adding water quantity to the Standard is not appropriate because there are no actual indicators provided in the Standard. --</p> <p>-----The standard should focus on water quality because these are the parameters that are protective of the water quantity that flow from these forests naturally (as the result of the hydrologic cycle that is driven by the sun rising every day). ----- Harvesting operations do rely on a quantity of water for maintaining native road surfaces in dry climates. This is done by drafting water from streams, rivers, and waterholes into water trucks and then spraying that water on the haul road surface. For harvest operations, would measuring the quantity of drafted water be required? How much water use is too much? In California there are a variety of mitigations that are imposed through our regulatory framework, including maintaining adequate waterflows in</p>	<p>quantity of rivers, streams, lakes, wetlands and other water bodies from degradation by forest management activities. . through meeting or exceeding best management practices</p>	



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
		streams, screening water drafting hoses, and recording water pumped (drafted into water trucks); but I'm not certain those are what SFI is intending, or is it? How would a certified participant demonstrate they are protecting or contributing to water quantity, year over year, using their preferred Silvicultural methods? How will water quantity be measured? Is this the rate of ground water recharge? Does this assume the Certified Participant has data on short or long-term water yields? I think demonstrating that an owner is protecting water quantity would be quite challenging, particularly without detailing the intent of the objective with more precision. The Performance Measures do not currently list indicators specific to water quantity, which indicates SFI may not have vetted this environmental factor adequately. The reference to protecting water quantity should be removed because assessing this parameter is currently beyond the scope of practicality. If SFI does proceed with water quantity indicator(s), those would need to include specifics relative to the methodology for the data collection and assessment, in order to achieve the intent of the water quantity objective.		





Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
172	3	Another area that seems missing in Objective 3 is explicitly addressing water quantity issues (I see 'water quantity' was not originally included here). Some consideration on how forest management activities may augment or moderate flood and drought events should be part of a sustainable forest management approach.	Address water quantity issues	Comment addressed with PM 3.2 and SFI Section 7 Guidance - Forest Management Impacts on Water Quantity.
175	3	Objective 3 requires protecting water resources “through meeting or exceeding best management practices.” Depending on regional differences this may be a very low bar. And again “protection programs” is the key, not protection outcomes. This is a particularly weak section. There is one reference to implementing programs, but no measurements are required to show that such implementation actually protects water resources.		Comment addressed with PM 3.1 and PM 3.2 and SFI Section 7 Guidance - Forest Management Impacts on Water Quantity.
177	3	Remove water quantity. Within most state BMP manuals there are no explicit references to water quantity and it would be difficult to audit.		Edit considered but not accepted as it does not improve the requirement.
181	3.1	Water quantity is addressed in the PM, but not in any of the associated indicators.	Create an additional Indicator addressing protection of water quantity.	Comment addressed with Indicator 3.2.2.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
182	3.1	There is no Canadian equivalent to the USEPA. In Canada, legal requirements about water quality in forest management is of provincial jurisdiction on public land and provincial/municipal on private land.	Certified Organizations shall meet or exceed all applicable federal, provincial, state and local water quality and water quantity laws and regulatory requirements, and meet or exceed best management practices developed under Canadian or U.S. Environmental Protection Agency–approved water quality programs	Comment addressed with edits to PM 3.1.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
187	3.1	Performance Measure 3.1 states that the laws will be followed but does not list actual water quality parameters to be protected. This is odd since water quality parameters affected by forestry activities are widely known (Temperature, Turbidity, pH, and Conductivity). Not explicitly stating any water quality parameters suggests a lack of data/understanding of Certified Organizations performance relative to actual water quality parameters and therefore some might suggest they are being intentionally avoided. That said, the goal of those laws is to prevent degradation of the beneficial uses of water so reference to the adherence to those laws is "credible". The Performance Measure 3.1 also includes a reference to BMPs that creates another circular reference, which is unnecessary since reference to the BMP implementation is appropriately found in each of the subsequent Indicators 1-3. Therefore, the reference to Performance Measure 3.1's Indicators in Performance Measure 3.1 can be deleted because the BMPs are appropriately listed as the actions that allow compliance with the laws referred to in the Performance Measure.	Edit Performance Measure 3.1 in the following way: Performance Measure 3.1 Certified Organizations shall meet or exceed all applicable federal, provincial, state and local water quality laws. , and meet or exceed all applicable federal, provincial, state, and local water quantity regulatory requirements. and meet or exceed best management practices developed under Canadian or U.S. Environmental Protection Agency–approved water quality programs. See the next comment in row 5 for the rationale for deleting "and water quantity".	Comment considered but not accepted as it does not improve the requirement.
189	3.1	water quantity is mentioned in the performance measure but not listed anywhere in the indicators.	Include water quantity in indicators so that it is more clear for organizations to understand what is the standard looking for.	Comment addressed with Indicator 3.2.2.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
190	3.1	It is mentioned that certified organization must meet or exceed best management practices, but no State best management practices includes water quantity measures.	I propose removing water quantity from the performance measure.	Comment considered but not accepted as it does not improve the requirement.
191	3.1	water quantity is mentioned in the performance measure but not listed anywhere in the indicators. Water quantity is not addressed in any state BMPs and this seems like it should be removed from the language.	I propose removing water quantity from the performance measure.	Comment considered but not accepted as it does not improve the requirement.
183	3.1	Support general intent of inclusion and expansion to include water quantity and assume that if no such regulations exist that this would not apply?	NA - perhaps just guidance but this may not be necessary as additional verbiage already includes the word "applicable..."	Comment addressed with SFI Section 7 Guidance - Forest Management Impacts on Water Quantity.
184	3.1	How will SFI assess compliance of proper water quantity management in regions that do not have an applicable regulatory requirement?	No change proposed. Requesting further explanation.	Comment addressed with SFI Section 7 Guidance - Forest Management Impacts on Water Quantity.
185	3.1	This implies there is a current inventory or summary of requirements and programs.	Clarify who is the onus on to know all of these requirements	Onus is on the Certified Organization as the certificate holder.
186	3.1	Stepping into water quantity laws/rules may bring unintended consequences. The SFI may want to simply use the broad term of "protecting water resources" to give yourself some flexibility. Forestry BMPs are not intended to manage 'quantity', per se, but are focused on localized small-scale site runoff and Erosion & Sediment control measures. The way forests manage 'quantity' on a meaningful scale is by		Comment addressed with SFI Section 7 Guidance - Forest Management Impacts on Water Quantity.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
		remaining as a forest, and not being converted to non-forest land cover.		
188	3.1	I am not aware of any water quantity regulatory requirements here in western Oregon. I believe inclusion of water quantity here puts the proverbial cart ahead of the horse. If you ask me it is more important to keep forest lands as forest lands and write of this notion of "water quantity" to climatic variables beyond our control.	PM 3.1 Certified Organizations shall meet or exceed all applicable federal, provincial, state and local water quality laws and meet or exceed best management practices developed under Canadian or U.S. Environmental Protection Agency-approved water quality programs.	Comment considered but not accepted as it does not improve the requirement.
192	3.1.1	Need a clear understanding of the definition of "water quantity regulatory requirements". Does this mean if there are no regulatory water quantity requirements at the local, state, or federal level related to the forest management of a tree farm that this indicator would not be applicable.	I can not propose new language without understanding the intent of this indicator.	Comment addressed with PM 3.2 and SFI Section 7 Guidance - Forest Management Impacts on Water Quantity.
193	3.1.3	This seems very vague.	Clarify if there any requirements for developing a monitoring plan with specific actions or indicators	Monitoring process the responsibility of the Certified Organizations to develop and implement.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
194	3.2	Would also depend on climatic zone.	Add climatic zone to other applicable factors	Comment addressed with edits to PM 3.2.
195	3.2	Climate is a key factor to consider in addressing management of water resources, but is not listed in the PM	Add "..., climate, ..." to the factors listed in the PM	Comment addressed with edits to PM 3.2.
198	3.2	Should also include geology.	Should also include geology	Comment considered but not accepted as it does not improve the requirement.
199	3.2	What is the difference between a water, wetland, riparian protection program vs. measure? (In regards to the changes to 3.1/3.2)		No edit proposed.
196	3.2	Maintaining water quantity should not be the only metric to the new standard. Mitigation of flash runoff is a very important benefit of forested landscapes. Recent heavy storms in the upper Midwest have cost billions of dollars of repairs to roads and bridges, dams, river properties, etc. Quantification of stormwater runoff mitigation by forestlands vs. other land uses would be a good story to show how we impact downstream public road infrastructure, flooding, riverbank stability, sediment loads, etc.,		Comment addressed with PM 2.3, PM 3.1, PM 3.2 and SFI Section 7 Guidance - Forest Management Impacts on Water Quantity.
197	3.2	What evidence will CB's be looking at related to water quantity?		Comment addressed with PM 2.3, PM 3.1, PM 3.2 and SFI Section 7 Guidance - Forest Management Impacts on Water Quantity.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
200	3.2	In relation to the addition of water quantity and guidance. It would be important to have that guidance to be able to have an ability to provide input for the last comment period. There is a lot of interest in water and how it relates to forest management. Law creation and policy can dictate new management implications as we have seen in the PNW. What will be the ways we are going to demonstrate we are conforming to the new language of the objective related to quantity. How are the auditors going to be directed.		Comment addressed with SFI Section 7 Guidance - Forest Management Impacts on Water Quantity.
201	3.2	How do we monitor water quantity? There is no guidance. This could potentially add a huge additional workload.		Comment addressed with SFI Section 7 Guidance - Forest Management Impacts on Water Quantity.
202	3.2	We are currently in a severe drought situation on the East Coast - no rain for 4 weeks. This will probably be followed by a huge rainfalls in late summer as tropical storms track up the Atlantic. How does an auditor assess water quantity during an audit?		Comment addressed with PM 3.2 and SFI Section 7 Guidance - Forest Management Impacts on Water Quantity.
203	3.2	Does anyone have an example of water quantity in a state BMP manual?		Noted.
204	3.2	Presently, there are no federal or state laws regarding water quality in the US aimed at forestry that I have been able to locate. Also, no mention in State BMPs		Noted.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
213	3.2.1	I understand the water quality protection. I am not understanding the protection of water quantity and its relevance in regards to a tree farm that does not actively use water. Water quantity is regulated by local, state, and federal agencies. Why would a timber property be required to protect quantity if the property is not pulling water from river, creeks, streams etc.	I propose indicator 3. 2.1 be removed from the performance measure as protection of water quantity falls under local, state, and federal agencies in regards to water use.	Comment considered but not accepted as it does not improve the requirement.
205	3.2.1	It remains unclear what the intended purpose of quantity is. The indicator should be updated, or guidance created for Objective 3 to clarify how quantity will be assessed and the scope of that assessment (e.g. geographic extent, temporal scale, metrics for assessment). Smaller organizations will not have the resources to quantify watershed level assessments of management.	Clarify within the standard the intention of "quantity".	Comment addressed with PM 3.2 and SFI Section 7 Guidance - Forest Management Impacts on Water Quantity.
207	3.2.1	It is unclear how a certified organization will measure / monitor water quantity over a large land base. Guidance will be required to outline expectation.	Create guidance for Objective 3 - PM 3.1	Comment addressed with SFI Section 7 Guidance - Forest Management Impacts on Water Quantity.
208	3.2.1	guidance needs to be clear on expectations for certifying organizations to develop "program addressing management and protection of water quality and water quantity"	Delete reference to "water quantity" without appropriate and agreed to guidance	Comment addressed with PM 3.2 and SFI Section 7 Guidance - Forest Management Impacts on Water Quantity.





Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
209	3.2.1	It's not clear if water quantity need to be measured, and if so, what the baseline would be, or how to measure it, and the scale at which certified organization would measure water quantity. Select some representative streams, lakes, etc.? or for each stream?	Clarify if it's necessary to measure water quality and give some guidelines if it's necessary to do so. Or state that it won't be necessary to measure water quantity.	Comment addressed with PM 3.2 and SFI Section 7 Guidance - Forest Management Impacts on Water Quantity.
210	3.2.1	Who would be responsible for water quantity monitoring and what would be the established baseline. With the prolonged drought in the west we could be looking at a reduction in water quantity completely unrelated to our forest practices, how would these natural occurrences be separated from water quantity losses due to forest practices?	I propose the language be clarified as to specifically what the certified organization would be responsible for, or the removal of the quantity language.	Comment addressed with PM 3.2 and SFI Section 7 Guidance - Forest Management Impacts on Water Quantity.
211	3.2.1	The addition of water quantity in this indicator could be problematic. The performance measure describes the implementation of forestry best management practices, but requires to a "program" that addresses both water quality and quantity. If a state's BMP's are silent on water quantity, then is an organization left with developing its own program for water quantity or possibly to pointing to other conservation efforts. For example an internet search through Wisconsin DNR's website for water quantity brings up many examples of pollution abatement, water withdrawals for high capacity wells and public water supply, but almost nothing relating water quantity to land management, more specifically forests. There is	It seems that guidance on how to address a program that includes water quantity is needed. SFI might give the examples of wetland and riparian protection beyond that required by BMPs for Water Quality as an example. I also think that the guidance must be clear that organizations are not expected to monitor stream flows or other monitoring of water quantity, but an organization could reference cooperating with or implementing a local, state or	Comment addressed with PM 3.2 and SFI Section 7 Guidance - Forest Management Impacts on Water Quantity.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
		a reference in the "Wisconsin's Great Lakes Strategy: Restoring and Protecting Our Great Lakes / 2009 Update" to maintaining wetlands and protecting riparian areas to improve or maintain streamflow from tributaries.	federal water quantity program if one exists.	
212	3.2.1	Is there any guidance on what information are included in these programs? Do programs consider climate change?	Add guidance on what information is included in these programs and if they consider climate change	Comment addressed with PM 3.2, PM 9.2 and SFI Section 7 Guidance - Forest Management Impacts on Water Quantity.
206	3.2.1	need to adjust language to indicate protection of the quantity of water in streams, etc. (not the number of streams)	Program addressing management and protection of the quality and quantity of <i>water from</i> rivers, streams, lakes, wetlands, other water bodies and riparian areas during all phases of management	Edit addressed with Ind. 3.2.1 and Ind. 3.2.2.
218	3.2.1 and 3.2.3	These two Indicators appear to be nearly functionally identical. Can they be combined into a single Indicator? Also, suggest adding "peatlands" to list to place emphasis on the ecological importance of protecting them.	Combine the two Indicators. Add "peatlands" to the list of features.	Edit addressed with PM 3.2.
214	3.2.2	Is this over and above provincially available map products?	Need to define if this is over and above provincially available map products	Comment addressed with Ind. 3.2.1, Ind. 3.2.2 and SFI Section 7 Guidance - Forest Management Impacts on Water Quantity.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
215	3.2.4	Replace wet-weather events by a term more general, and give example of those events	Programs that address adverse environmental conditions (such as heavy rainfalls, early thaws, soft grounds) in order to maintain water quality (such as forest inventory systems, wet-weather tracts and definitions of acceptable operating conditions)."	Edit addressed with PM 3.2.
216	3.2.4	The Idaho SIC requests a definition of "wet-weather tracts".		Task Group decided not to define this term as it is a long-standing term in the SFI Standard and is well understood.
217	3.2.4	This is unclear... is this rain storms, or extreme rain events, flooding?	Need to define wet-weather tracts	Task Group decided not to define this term as it is a long-standing term in the SFI Standard and is well understood.
219	4	Objective 4 requires managers to "maintain or advance" conservation of biological diversity. While land managers should comply with federal law on listed species, there is no requirement to go further. Objective 4 references sources for information about ecologically important species and natural communities, but it is left to the discretion of the forest manager how to respond to that information.  Again, the indicators for Objective 4 emphasize having programs, developing criteria and implementing practices which address biological		Edits made to Objective 4 and PMs 4.1, 4.2, 4.3 and 4.4 strengthen the Objective.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
		diversity. But still, no measurable outcomes required.		
<b>220</b>	4	Intact and primary forests are critical for carbon storage and protecting plant and animal biodiversity. There is growing global consensus that large areas of the natural world need to be protected in order to avoid the worst effects of climate change and mass species extinction, including national governments' commitments to protecting thirty percent of the world's natural areas by 2030. Voluntary certification bodies should therefore build on and enhance these commitments. Yet the proposed standard has no requirements for organizations to set aside and protect primary or intact forests, either from a carbon storage lens or species protection lens.		Comment addressed with new Objective 9 - Climate Smart Forestry.
<b>222</b>	4	"To maintain or advance" has potential to set expectations at an unrealistic level, particularly when contrasting plantation and natural forests. Suggest slight revision to former language.	"...To manage the conservation of biological diversity..."	Comment considered but not accepted as it does not improve the requirement.
<b>223</b>	4	To maintain or advance has potential to set expectations at an unrealistic level, particularly when contrasting plantation and natural forests. Suggest slight revision to former language.	...To manage the conservation of biological diversity..."	Comment considered but not accepted as it does not improve the requirement.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
224	4	The wording of objective 4 is very dense because spatial scale and measures of diversity are mixed in one sentence.	Suggest rewording so there is one sentence stating the goal at the stand and landscape level and a separate sentence on different measures of biodiversity.	Comment considered but not accepted as it does not improve the requirement.
225	4	The term “biological diversity” should include the identity of the species in question otherwise the term is not very useful in this context of SFM. If you strip the compositional part from the term biological diversity then it is not a sufficient goal for SFM. The term or idea of ‘native’ absolutely needs to be included.	Either provide a definition that includes composition of species where ‘native’ is a fair and desirable descriptor or talk instead about biological integrity which includes species composition, relative abundance and function.	Comment addressed with edits to Indicator 4.1.1.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
226	4	<p>We previously recommended that the SFI adopt more concrete and protective measures for rare, threatened, and endangered (RTE) species, including species-at-risk. The need for such measures is as urgent as ever, including as noted in a 2019 UN statement that confirmed “1 million species are threatened with extinction and that changes to land and sea use are the biggest threat.” However, the draft Standard’s provisions for RTE species are essentially unchanged and unimproved, much to our extreme disappointment. Indicators 4.2.1, 4.2.2, and 4.1.5 merely require “programs to protect” threatened and endangered species and “programs to address the conservation of ecologically important” species. These Indicators provide no criteria for what the programs must actually do or achieve, nor is there any mention of species’ habitats or other factors critical to their survival and recovery. Thus companies that only protect a small percentage of the threatened or endangered species’ populations in their forests, that only provide temporary protection, and/or that protect none of their habitat, can presumably be deemed in compliance – as has been the case with the prior iterations of the Standard. Being deemed “ecologically important” will also not help species, as Indicator 4.3.2 just requires “appropriate management,” which could be anything. The Standard also does not require populations and habitats of most threatened</p>	<p>We recommend the Standard be revised to:</p> <ul style="list-style-type: none"> <li>Require that prior to commencing management activities, organizations identify and fully and consistently protect all animal and plant species designated by national and regional scientific processes as rare, threatened, and endangered (including but not limited to species-at-risk). Protections must cover all of the species’ populations and habitats, with surveys conducted whenever species are potentially present.</li> <li>Require protection strategies to be peer-reviewed and deemed effective per the best available science, and not rely solely on regulations that have not been scientifically proven effective for species’ protection and recovery.</li> <li>Encourage the restoration of habitats for species’ survival and recovery, and the protection of habitats likely to support species’ adaptation to climate change.</li> </ul>	<p>Comment addressed with edits to PM 1.4, Objective 4, PM 4.1 - 4.4, Objective 9, PM 9.1 and 9.2 and PM 12.1.</p>



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
		<p>and endangered species to be identified in certified forests, meaning they will not receive protection “programs.” Indicator 4.2.2 limits the required identification of RTE species and their habitats to “known sites... associated with viable occurrences of critically imperiled and imperiled species....” In turn, the Definition of Forests of Exceptional Conservation Value (FECV) limits critically imperiled species to those listed as G1, and imperiled species to G2 species -- thereby ignoring the many North American species that are seriously threatened and endangered, but are not amongst the most globally endangered species. Even occurrences of G1 and G2 species could go unrecognized, as Indicator 4.3.1 and the focus on known sites point to databases that, important as they are, suffer a chronic lack of information for many forest areas, including most industry forests in the United States. The Guidance for FECV also exempts sites lacking “excellent,” “good,” or “fair-plus” viability ratings. Meanwhile, the Definition of “ecologically important” is highly subjective and open to interpretation by organizations. Indicator 4.3.1 and the Guidance for such species also affirms that organizations are not required to survey for them, and can rely on the same important but incomplete databases.</p>		



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
227	4	Gets long for an objective.	"To maintain or advance the conservation of biological diversity at the stand and landscape level and across a diversity of habitats and successional stages." Put the rest in the Guidance section.	Comment considered but not accepted as it does not improve the requirement.
228	4	Objective 4: Conservation of Biological Diversity – successional stages are difficult to define let alone inventory and assess – what are the successional stages implied here? Many elements, like old growth, moved around the landscape over long time periods – they won't last forever – why is there no provision for future old growth?		Comment addressed with edits to Objective 4 and PMs 4.1, 4.2, 4.3 and 4.4.
221	4	Support the intention of the edits which will strengthen the impact of this objective. The previous text required the development and implementation of stand and landscape-level measures to promote ... whereas the newly edited text requires that certificate holders maintain/enhance biodiversity at both the stand and landscape-level. This is a good edit/change.  However, some edits are not helpful and create more confusion by lumping (through an attempt to simplify) concepts together that are not directly connected and visa-versa. Suggest simplifying further as suggested to the right.	To maintain or advance the conservation of biological diversity at the stand- and landscape-levels by developing and implementing measures that promote diversity of forest and vegetation cover types and successional stages and the conservation of forest and aquatic plants and animals, threatened and endangered species..."	Edit considered but not accepted as it does not improve the requirement.





Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
229	4.1	We are seeking more guidance on what a “Program to incorporate the conservation of biological diversity” would entail.	Recommendation: Provide more detail on the level of flexibility a Certified Organization has in the program’s content and consideration.	Comment addressed with edits to SFI Section 7 Guidance - Conservation of Biological Diversity.
230	4.1	Indicator 3 requires to have a program to support diversity by incorporating results of analysis at landscape level and ownership/tenure level. For certified organization with big assets landscape and tenure level is about the same. Tenure or asset level can be considered a landscape.	Replace landscape AND tenure level, by Landscape OR tenure level.	Comment considered but not accepted as it does not improve the requirement.
231	4.1	In PM 4.1.1 - Commented [SFI 11]: Staff has developed guidance to address: the use of credible sources; the link between assessments and informing management practices to aid in landscape-level outcomes; various sources and means to engage with credible partners toward these goals.		Comment addressed with edits to SFI Section 7 Guidance - Conservation of Biological Diversity.
232	4.1	There are still no specific landscape, or coarse-scale, biodiversity indicators in the SFI standard. As a result, it is very difficult to point to tangible landscape-scale conservation results as a result of SFI. Adopt clear, auditable landscape-level biodiversity indicators that, at a minimum, meet PEFC requirements and, ideally, move towards the biodiversity-related elements of the HCV definitions and approach.		Comment addressed with edits to Indicator 4.1.3.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
235	4.1.1		Définir au glossaire ce qu'on entend par "communauté écologique (Ecological community type)".	Comment considered but Task Group decided not to define ecological community. Instead reliance placed on the defined term ecologically important. See SFI Section 14 - Definitions.
233	4.1.1	'Ecological community' is not defined in the glossary.	Define "ecological community" in the glossary.	Comment consider but Task Group decided not to define ecological community. Instead reliance placed on the defined term ecologically important. See SFI Section 14 - Definitions.
234	4.1.1	In the Glossary, the definition of ecological community could be add.		Comment consider but Task Group decided not to define ecological community. Instead reliance placed on the defined term ecologically important. See SFI Section 14 - Definitions.
258	4.1.1 & 4.1.3	4.1.1 moves the word "native", 4.1.3 leaves it in place, it this intentional?		Yes.
236	4.1.2	These elements of forest structure are very difficult to quantify, identify and there are no meaningful standards for what to leave for most of them.		Comment addressed by Ind. 4.1.2 and definition of 'best scientific information'. See SFI Section 14 - Definitions.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
259	4.1.2 and 4.1.4	These indicators should include something about indigenous knowledge. In Canada there is a growing involvement of indigenous communities in conservations so conservation measures (indicator 2) for certified areas that are on indigenous traditional lands should consider indigenous knowledge systems. For indicator 4, it should since some First Nations have developed conservation plan, strategies they should not be ignored.		Comment addressed with Ind. 4.1.4.
237	4.1.3	French translation of "Program to individually or collaboratively support..."	"Programme pour supporter individuellement ou collectivement la diversité..."	Refer to Ind. 4.1.3 in SFI Forest Management Standard on SFI French language Website.
238	4.1.3		4.1.3 Program to Retain or restore all naturally occurring forest cover types, and age or size classes within those forest cover types at the individual ownership level. Individually or collaboratively support diversity of native forest cover types and age or size classes that enhance native biological diversity, by incorporating the results of analysis of documented diversity at landscape and ownership/tenure levels, to ensure the contribution of the managed area to the diversity	Edit considered but not accepted as it does not improve the requirement.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
			of conditions that promote biodiversity.	
240	4.1.3	"native forest cover types" inclusion raises unreasonable expectations and will have unintended consequences. Delete reference here entirely	"...support diversity of size and age classes..."	Edit considered but not accepted as it does not improve the requirement.
239	4.1.3	We have been told that Landscape Level Analysis is a challenge to US private landowners due to antitrust issues. We can reference State strategies of course.		Comment addressed by Ind. 4.1.3. A program can reference state strategies.
241	4.1.3	The phrase "promote biodiversity" isn't quite the right idea. To say "promote biodiversity" sounds like any biota will do.	Suggest using the term native biota	Edit considered but not accepted as it does not improve the requirement.
242	4.1.3	This implies that SFI Participants are responsible for the management of other landowners. If the public decides to increase harvests, then the State is required to change management to ensure diversity of age/size classes.	Change "ensures" to "evaluate"	Edit considered but not accepted as it does not improve the requirement.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
243	4.1.4	<p>"incorporate the results of" ... conservation planning ... and "incorporate the results of" these efforts in forest management planning</p> <p>1. Why is "incorporate the results of" written twice in this sentence?</p> <p>2. What does incorporate mean? Does it mean follow all recommendations, or acknowledge and justify a different approach?</p> <p>Also in Section 7, page 135/260, last paragraph "Analysis and "incorporation" therefore could include assessment of range maps..."</p>	<p>Define "incorporate the results." If not included in Definitions, point to discussion in Section 7 of what "incorporation" could include, and how adherence will/may/could be audited.</p>	<p>Task Group decided not to define this term as it is well understood. Also, See SFI Section 7 Guidance - Conservation of Biological Diversity.</p>
245	4.1.4	<p>This indicator implies that we need to incorporate all research results into our management planning. The standard should be clear that only credible, relevant research results need to be incorporated, as we may not agree with them all. This way it is aligned with the intent of the new Species at Risk Module.</p>	<p>4.1.4. Certified Organizations shall participate in or incorporate the results of state, provincial, or regional conservation planning and priority-setting efforts to conserve biological diversity and incorporate the results of credible, relevant efforts in forest management planning. Credible priority-setting efforts include state and provincial wildlife action plans, state forest action plans, relevant habitat conservation plans, provincial wildlife recovery plans, or ecoregional plans</p>	<p>Edit addressed in Ind. 4.1.4.</p>



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
244	4.1.4	This is essentially adaptive management and requires effectiveness monitoring. No agency, let alone large non-government landowner, is doing this now in an operational context. There are some long-term research projects that are doing it on a small scale. This requires a well designed and rigorous monitoring program. Essentially, right now, it is all based on trial and error. I would say that this is not achievable right now.		No edit proposed.
260	4.1.5 et 4.2.1	Dans le contexte qui prévaut au Québec, il y a un chevauchement des espèces visées par ces 2 indicateurs. Si on réfère aux définitions du glossaire, le groupe des espèces écologiquement importantes (Ecologically important species) inclut les niveaux S (S-Rank). C'est le cas également pour le groupe des espèces menacées ou en voie d'extinction (Threatened and endangered species). Deux non-conformités pourraient donc être émises pour un seul et même enjeu.	Revoir la définition d'espèce écologiquement importante (Ecologically important species) et/ou d'espèces menacées ou en voie d'extinction (Threatened and endangered species) de manière à éviter les chevauchements.	The two terms are defined to avoid possible overlap and confusion. See Section 14 - Definitions.
253	4.1.5	The Idaho SIC requests a definition of "locally rare".		Comment considered but Task Group decided not to define locally rare.
246	4.1.5	The addition of "locally rare" while thought to provide flexibility according to the guidance document will create unnecessary confusion and, potentially, expectations.	drop the word "locally"	Edit addressed by Ind. 4.1.5.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
247	4.1.5	is there a definition of important natural communities?		Comment considered but Task Group decided not to define important natural communities. Instead reliance placed on the defined term ecologically important. See SFI Section 14 - Definitions.
248	4.1.5	Is term 'local' referring to the province/state level or at a forest management unit level? If forest management unit, how do you define locally rare for species?		Comment considered but Task Group decided not to define locally rare.
251	4.1.5	"Locally Rare" needs definition	See Definitions Tab	Comment considered but Task Group decided not to define locally rare.
252	4.1.5	Two concerns. First, dropping viable populations" opens the requirement by a factor of X. Second, not all certified organizations will have natural communities. Expansion of the indicator to include natural communities must have a qualifier. Certainly the expectation is not restoration of natural communities. Viable is present and integral to 4.2.2	"...conservation of known sites with viable occurrences of ecologically important species and where present, natural communities..."	Edit considered but not accepted as it does not improve the requirement.
249	4.1.5	Are ecologically important species limited to G3, S1-3, and locally rare or does it include common S5 species that are of management concern such as black bear?		Comment addressed with definition of ecologically important - see SFI Section 14 - Definitions.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
250	4.1.5	Are all FECV's (G1-G2 species and communities) "ecologically important"? Is there overlap between ecologically important sites and FECVs?		Comment addressed with definitions of FECV and ecologically important - see SFI Section 14 - Definitions.
255	4.1.6	Put ecologically important in the right place. Vernal pools may be forested or non-forest.	"Identification and protection of ecologically important non-forested wetlands, including bogs, fens and marshes, and certain vernal pools."	Edit considered but not accepted as it does not improve the requirement.
254	4.1.6	Peatlands are not included n the list of ecologically important wetlands despite their critical role in maintaining water quality and quantity, unique habitat and carbon storage .	Add "peatlands" to the list of non-forested wetlands.	Edit addressed with Ind. 4.1.6.
256	4.1.8		4.1.8 Consider Certified Organizations manage for and incorporate consistency with natural disturbance regimes, including the use of prescribed or natural fire where ecologically appropriate, and forest health threats in relation to biological diversity when developing forest management plans. Opening size, harvest layout, and structural retention are designed in proportions and configurations that are consistent with the characteristic natural	Edit considered but not accepted as it does not improve the requirement.





Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
			disturbance regime in each community type.	
257	4.1.9		4.1.9 Certified Organizations identify and conserve globally, regionally and nationally significant landscape areas with natural distribution and abundance of native species.	Edit considered but not accepted as it does not improve the requirement.
261	4.2	FECV - what scale of imperilment? Global? National? State? Local?		No edit proposed. FECVs are G1, G2 species and ecological communities.
262	4.2	We have consistently recommended that protection of Forests with Exceptional Conservation Value (FECV) should be augmented to include old growth and other primary, intact, and endangered forests and biodiversity hotspots, including as per on the Wye Group report. The draft Standard still defines FECV narrowly, as “critically imperiled” and “imperiled” species and ecological communities, i.e., those listed as G1 and G2. Many of the forest and woodland communities listed as G1 and G2 in North America appear to be naturally rare, or heavily impacted by non-forest conversion, e.g., riparian and coastal forest types in the United States. Yet as noted above, the Standard lacks meaningful criteria and outcomes for “programs to protect” FECVs, allowing for partial protections or other insufficient measures. Old growth forests, Intact	We recommend the Standard be revised to: <ul style="list-style-type: none"> <li>Require consistent identification and full protection of old growth and primary forests from logging and other threats.</li> <li>Require consistent identification and protection of Intact Forest Landscapes as defined and mapped by the IFL Team.</li> <li>Encourage organizations to work collaboratively to achieve landscape level conservation of IFLs across the globe.</li> <li>Require engagement and cooperative management with local communities and Indigenous Peoples/First</li> </ul>	Portions of the comment addressed by edits in PM 4.2. Engagement with local communities and Indigenous Peoples addressed with edit to Objective 8 and Objective 15.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
		Forest Landscapes (IFLs), other primary forests, and other ecologically crucial forest areas remain largely unprotected by the Standard, which (aside from old growth) does not recognize ecosystems whose plant species associations are more common, but whose age classes, level of intactness, and wildlife habitats are rare and threatened. The Standard's old growth Indicator is mostly unchanged, and merely calls for "support of and participation in programs for the conservation of old growth forests in the region...." In addition to not requiring any particular amount or quality of old growth protection, this language allows organizations to completely avoid protecting old growth in certified forests. Meanwhile, the Standard is silent with regard to other primary forests and IFLs.	Nations, to identify and protect areas important as food and water sources, or as cultural sites.	
263	4.2	Indicator 2 indicates protection to Forests with exceptional conservation value, but not clear the scale of those.	Indicate guidelines for the scale of FECV.	Comment addressed with edits to SFI Section 7 Guidance - FECV.
264	4.2	The proposed SFI standard has very ill-defined and non-obligatory language around organizations' duty to protect the habitat of threatened species. SFI-approved operations could thus be able to continue degrading the habitat of species like the boreal caribou, a threatened indicator species whose declining populations reflect broader ecological instability in Canada's boreal forest. In contrast, the Forest Stewardship Council Canada has created new safeguard requirements for operations that		No edit proposed.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
		could impact boreal caribou habitat, with significantly more robust policy requirements for operators than SFI's vague guidance. <sup>7</sup>		
265	4.2	What's the meaning of "Ecologically Important Systems" and its relationship to FECV		Comment addressed with definition of the term ecologically important.
266	4.2	yes protection of old-growth is important but these stands do fall apart in time...	Suggest adding the idea of provision of old-growth, i.e. planning for old-growth in forest management plans. That is critical. Old-growth needs to be renewed through longer rotations of some stands. Also need to recognize management objectives approved by provincial/territorial jurisdictions.	Comment addressed with PM 4.2 and SFI Section 7 Guidance - Forest with Exceptional Conservation Value.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
268	4.2.2		4.2.2 Program to Locate and protect known sites flora and fauna associated with viable occurrences of critically imperiled, and imperiled, and vulnerable species and ecological communities defined as Forests with Exceptional Conservation Value. Programs Measures for protection may be developed independently or collaboratively, and may include Certified Organization management, cooperation with other stakeholders, or use of easements, conservation land sales, exchanges, or other conservation strategies.	Edit considered but not accepted as it does not improve the requirement.
267	4.2.2	"Ecological communities" needs definition	See Definitions Tab	Comment considered but Task Group decided not to define ecological communities. Instead reliance placed on the defined term ecologically important. See SFI Section 14 - Definitions.
269	4.2.2	Broaden the definition of FECV to include all globally vulnerable species and communities. Adopt measurable, auditable outcome measures to protect vulnerable species and communities.		Comment addressed by definition of FECV and ecologically important. See SFI Section 14 - Definitions.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
270	4.2.3	Regarding <i>"Support of and participation in programs for the conservation of old-growth forests ...."</i> Be mindful of management objectives that the P/T jurisdictions have established (e.g., as a biodiversity objective, rather than "protect old growth" (i.e., old stands, by definition), identify & sustain identified old growth attributes essential for species x).		Comment addressed with Ind. 4.2.3.
271	4.2.3		4.2.3 Support of and participation in programs for the In the lower 48, Certified Organizations conserve conservation of any old-growth forests on their ownerships in the region of ownership or forest tenure.	Edit considered but not accepted as it does not improve the requirement.
272	4.2.3	This requirement has little or nothing to do with how old growth is treated on SFI certified lands. At this point, there is very little old growth left in the U.S. (outside of Alaska) and SFI could contribute to the conservation of that remaining old growth with stronger requirements. Adopt clear prohibitions on harvesting old growth in the U.S.		Comment considered but not accepted as it does not improve the requirement.
273	4.3	Improve clarity.	Change "ecologically important sites" to "ecologically important areas". Three instances.	Comment considered but not accepted as it does not improve the requirement.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
274	4.3	Performance Measure 4.3 and its associated indicators are quite vague. The variation in terminology from "manage to protect", "select for protection", and "appropriate management" should be cleaned to communicate a clearer intent. Also, more specificity should be given about what basis should be used to determine what constitutes appropriate management (e.g. expert advice).		Comment considered but not accepted as it does not improve the requirement.
275	4.3	There is potential overlap between Perf. Measure 4.3 and Indicator 4.1.5. There's more detail in 4.3 than 4.1.5, but they are both addressing conservation or protection of ecologically important sites, species, and communities. Good content, but how should these be differentiated?		Comment addressed by edits in Ind. 4.1.5.
277	4.4	Indicator 3 should be removed from under Performance Measure 4.4. This notion should rather be addressed under Performance Measures 11.1 and 11.2, which already calls for research to address questions of relevance in the region of Operations. The addition of specific research that clarifies the conservation outcomes resulting from management strategies, might create an additional burden or could be inferred as being the same. Intent should be clarified.	Remove Indicator 3 under Performance Measure 4.4.	Edit accepted.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
278	4.4		Suggest adding the Ontario Breeding Bird Atlas Program as one of the listed program. This is the largest biodiversity field sampling effort in the province	Comment considered but not accepted. It would not be possible the include all similar references.
281	4.4		3. Individually or collaboratively participate in or support research that clarifies quantifies the outcomes resulting from management strategies.	Edit addressed with Ind. 4.4.3.
276	4.4	Monitoring of the effectiveness of conservation programs is not included as a source of improved knowledge.	Include "results of monitoring of the effectiveness of conservation-related programs" to list of sources of improved knowledge.	Edit addressed with PM 4.4.
280	4.4.	-	Individually or collaboratively participate in or support research and monitoring effort that clarifies the conservation outcomes resulting from management strategies.	Edit addressed with Ind. 4.4.2 and Ind. 4.4.3.
279	4.4.	-	Certified Organizations shall apply knowledge gained through research, science, technology, field experience and monitoring effort to manage wildlife habitat and contribute to the conservation of biological diversity.	Edit addressed with Ind. 4.4.2 and Ind. 4.4.3.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
282	4.4.1		1. Collection of information on Forests with Exceptional Conservation Value and other biodiversity-related data through forest inventory processes, mapping or participation in external programs, such as NatureServe, state or provincial heritage programs, or other credible reputable systems organizations. Such participation may include providing non-proprietary scientific information, time and assistance by staff, or in-kind or direct financial support.	Edit addressed in Ind. 4.4.1.
283	4.4.2	Replace "methodology" with "program".	A <i>program</i> to incorporate data collected, research results and field applications of biodiversity and ecosystem research into forest management decisions.	Edit addressed in Ind. 4.4.2.
284	4.4.3	Appears to be duplicate with indicators in Objective 11 Research	Incorporate this indicator in PMs 11.1 & 11.2	Comment addressed with PM 12.1 and PM 12.2.
286	4.4.3	The word "clarifies" in this indicator is confusing.	Change "clarifies" to "evaluates" or "assesses"	Edit addressed with Ind. 4.4.3.





Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
287	4.4.3	"Individually or collaboratively participate in or support research that clarifies the conservation outcomes resulting from management strategies." This term "conservation" is confusing and could be misinterpreted. The performance measure requires to manage wildlife habitat and contribute to conservation of biodiversity	Suggest: "Individually or collaboratively participate in or support research that evaluate the impacts of forest management strategies on wildlife habitats and the conservation of biodiversity."	Edit addressed with Ind. 4.4.3.
285	4.4.3	Proposed language is very unclear and maybe impossible to audit. "...clarifies the conservation outcomes resulting from management strategies..." is a nice-sounding phrase, but has no practical or objective meaning.	a) Clear simple language like, "...research related to conservation of FSCV..." OR better option (b) Add something appropriate to Objective 10.	Edit addressed with Ind. 4.4.3.
288	5.2	Objective 5 concerns visual qualities and recreational benefits. Section 5.2 addresses clearcut size by asking that Certified Organizations observe an average clearcut size of 120 acres, with exceptions for ecological objectives and "forest health" emergencies. But even this disguises the hollowness of this limitation. An average can be calculated across many forest management holdings, even distant holdings of different forest types. Thus, Section 5.2 fails from both a visual or ecological perspective.		No edit proposed.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
289	5.2	SFI allows clearcut larger than 120 acres in ill-defined circumstances, for example, "when necessary... to achieve ecological objectives." These "ecological objectives" are extremely nebulous and could easily be used to justify clearcutting in large areas of intact forest, especially considering that SFI's communication materials claim without caveat that its own certified forest harvesting operations are beneficial to the global climate, an unnuanced position which is in conflict with peer-reviewed science.		No edit proposed.
290	5.3	There is often confusion between 'green-up' and Visually Effective Greenup. We should be clear of this difference by changing any reference to 'green-up' to 'Free Growing Green-up'	Replace any references to 'green-up' (including within the definitions) with 'Free Growing Green-up' so there is no confusion with VEG.	Comment considered but not accepted as it does not improve the requirement. Proposed edit is a very regionally specific term.
291	5.3.3	use of "Program Participant" is not consistent	"...utilized by the Certified Organization."	Noted.
292	5.3.3.	Editorial	Change "Program Participant" to "Certified Organization"	Certified Organization is now the defined term. See SFI Section 14 - Definitions
293	6	Improve clarity. Use defined term.	"To manage special sites that are geologically or culturally important in a manner that takes into account their unique qualities."	Comment considered but not accepted as it does not improve the requirement.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
294	6.1	Given that outreach opportunities on management of special sites with Indigenous Peoples vary by location, governance structures, and other relevant circumstances, formal consultation requirements create challenges that could complicate such engagement. The Idaho SIC recommends changing “stakeholder consultation” to “stakeholder outreach” and “and consultation” to “and making management plans available for comment”.		Comment considered but not accepted as it does not improve the requirement.
295	6.1.1	Change the sentence to recognize special site inputs from all sources equally.	Use of information such as existing natural heritage data, expert advice, stakeholder consultation, and consultation with Indigenous Peoples in identifying or selecting special sites for protection .	Edit addressed with Ind. 6.1.1.
296	6.1.1	shift grammar for clarity	Use of information such as existing natural heritage data, expert advice or stakeholder consultation, consultation with Indigenous Peoples in identifying or selecting special sites for protection.	Edit addressed with Ind. 6.1.1.
297	6.1.1	While geological information may be housed in natural heritage data, cultural data is not.	Insert - "...such as existing natural or cultural heritage data"	Edit addressed with Ind. 6.1.1.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
298	6.1.1	Specify information resulting from stakeholder and Indigenous People consultation.	Suggest: "Use of information such as existing natural heritage data, expert advice and reports from stakeholder and Indigenous Peoples consultation in identifying or selecting special sites for protection".	Edit addressed with Ind. 6.1.1.
299	6.1.1	the placement of "and" and "or" seems misaligned	"...expert advice, stakeholder consultation or consultation with Indigenous Peoples..."	Edit addressed with Ind. 6.1.1.
302	6.1.1	Indigenous Peoples with knowledge of culturally important sites are by definition stakeholders. And there are not Indigenous Peoples with knowledge of culturally important sites on every land base.	"Use of information such as existing natural heritage data, expert advice or stakeholder consultation, including consultation with Indigenous Peoples, in identifying or selecting special sites for protection."	Edit addressed with Ind. 6.1.1.
301	6.1.1	Stakeholder input is appropriately listed as a source of information on special sites but is limited only to identification and selection of special sites for protection. Stakeholders should also be consulted on appropriate management strategies for protection of special sites.	Add an Indicator 3: "Stakeholder input regarding management practices for protection of special sites is solicited and considered."	Edit addressed with Ind. 6.1.1 and Ind. 6.1.2.
300	6.1.1		6.1.1 Certified Organizations shall have a program to identify , manage and protect special sites and manage them in a manner appropriate for their unique features.	Edit addressed with Ind. 6.1.1.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
303	6.3.1	Typo? Believe "program for key personnel;" is intended?	PM6.3.1a. To end ..."program for key personnel;"	Edit addressed with definition of certified logging company. See SFI Section 14 - Definitions.
304	7	'Minimize waste' seems redundant, and it invites distraction on the definition of the word 'minimize'.	"To ensure the efficient use of fiber resources."	Edit considered but not accepted as it does not improve the requirement.
305	7.1	Focus on efficient utilization of forest resources. Waste is part of that.	"Certified Organizations shall employ appropriate forest harvesting technology and in-woods manufacturing processes to ensure efficient utilization of forest resources, where consistent with other SFI Standard objectives."	Edit considered but not accepted as it does not improve the requirement.
306	7.1.1 b	enhancing utilization may not always be the best choice from an ecological perspective	b. "training or incentives to encourage loggers to enhance utilization where ecologically appropriate	Edit addressed with Ind. 7.1.1 a.
307	8	How companies should consider private wood		No edit proposed.
308	8	Where can certified organizations get the training that is required for Objective 8?		Comment addressed with SFI Section 7 Guidance - Objective 8. SFI is also developing materials for use by SICs and Certified Organizations.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
309	8	Concerned about Certified Organizations each crafting their own policy unless these policies will be developed in collaboration with Indigenous partners and account for regionality	If the SFI are looking to be horizontal and take a lead, working with all stakeholders and partners to develop a more robust policy with unified standards and expectations is recommended. It would also ensure better coverage, and could remain evergreen to improve and add to as time goes on	Comment addressed with edits to PM 8.1.
310	8	Unsure if the term “Indigenous peoples” is appropriate.	The SFI may want to change the wording to “Indigenous Rights Holders”, this has more weight and would apply to all nations recognized by section 35 of the constitution, which Indigenous partners expect to see	Comment addressed by SFI definition for Indigenous Peoples. Refer to SFI Section 14.
311	8	Not all jurisdictions consult and engage consistently and a certification standard should raise the bar beyond the lowest regulations required by a jurisdiction.	Suggest additional guidance should include definitions (since this is an international standard) and provide overarching guidance beyond simply pointing the certified organization to the jurisdiction and their policies/requirements for Consultation and engagement	Comment addressed with edits to PM 8.1.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
312	8	Guidance / training materials needed to assist Auditors when assessing the quality of meaningful engagement between Certified Organization and First Nations.		Comment addressed with SFI Section 7 Guidance - Objective 8. SFI is also developing materials for use by SICs and Certified Organizations.
315	8	Objective 8 rightly sets the goal of recognizing and respecting Indigenous Rights and traditional knowledge. Yet there are weaknesses in this section. As mentioned in the Objective, conferring and reaching out to Indigenous Peoples with traditional claims to forest values is essential. But going a step further to engage those interests in management and auditing of their heritage lands would help ensure better outcomes. Also, specifically allowing for inclusion of peoples whose traditional claims have not yet been legally codified would recognize that our current legal and social landscape does not capture the full reality of Indigenous Peoples connections to forest landscapes.”		Comment addressed with edits to PMs 8.1 & 8.2.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
316	8	<p>The Standard's recognition of the UN Declaration on the Rights of Indigenous Peoples (UNDRIP) is important. However, the Standard should also adopt Indicators that put key elements of UNDRIP into action for certified forests, including with regard to UNDRIP Article 26 and Indigenous Peoples' rights to control of the lands, territories, and resources they have traditionally owned, occupied, or otherwise used or acquired. It is not enough for the Standard to require policies that "recognize" Indigenous Peoples and their rights per UNDRIP, laws, and treaties, as per Indicator 8.1.1. Policies must also be implemented, with forest management consistently respecting and protecting those rights. In particular, the Standard still does not explicitly or consistently require organizations to secure Free, Prior, and Informed Consent (FPIC) from Indigenous Peoples/First Nations before conducting operations that may affect their rights and resources, despite FPIC being global best practice. The Standard does include constructive new language regarding consultation, communication protocol, and review of management plans. However, these Indicators largely exempt the vast amount of non-publicly owned forests that are SFI certified in North America, tend to focus on the identification of "special sites," and neither require protections for sites to be developed collaboratively, nor address the fundamental</p>	<p>We recommend the Standard be revised to:</p> <ul style="list-style-type: none"> <li>Require organizations to recognize all legal protections of Indigenous Peoples' land, tenure and resource rights. Recognition of judicial decisions should be explicitly required in the Standard's Indicators.</li> <li>Require all organizations to respect the traditional and customary rights of Indigenous Peoples to utilize and govern their lands and resources, regardless of whether those rights are legally recognized.</li> <li>Require all organizations to secure Free, Prior, and Informed Consent from Indigenous Peoples prior to conducting operations that may affect their lands, resources, or legal or customary rights.</li> <li>Require co-management and economic benefits sharing where sought by the Indigenous Peoples.</li> <li>Afford an opportunity for Indigenous Peoples to be part of the independent audit process.</li> <li>Ensure that Indigenous Peoples can safely</li> </ul>	<p>All comments addressed with edits to PMs 8.1 &amp; 8.2, with the exception of the reference to requiring FPIC.</p>





Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
		question of whether consent has been granted by Indigenous Peoples/First Nations to manage forest areas and resources – including beyond “special sites.” This crucial question of consent is partially addressed in Guidance recognizing the Tsilhqot’in judicial decision in Canada. Yet the relevant Indicators oddly do not include court decisions among the body of laws to be respected. Nor does the Guidance meaningfully address situations where traditional rights of Indigenous Peoples/First Nations are not legally recognized, both in Canada and the United States.	participate in consultations, management planning, FPIC engagement, and other processes.	
318	8	<p>Mention "Reconnaissance et respect des droits des Autochtones":</p> <p>Il n'est pas de la prérogative des tiers, comme une organisation certifiée, de reconnaître des droits à des groupes autochtones au Québec. Le paragraphe 35(1) de la Loi constitutionnelle de 1982 reconnaît et confirme les « droits existants — ancestraux et issus de traités — des peuples autochtones du Canada. ». Fait important, la Cour suprême du Canada (CSC) a précisé que l'existence et la portée des droits autochtones au sens de l'article 35(1) doivent être déterminées au cas par cas selon une preuve historique et factuelle. Ce ne sont donc pas tous les Autochtones qui peuvent bénéficier de ces droits ou qui bénéficient des mêmes droits. En règle générale, il existe deux manières</p>	Reformuler l'objectif 8 : Reconnaissance et Respect des droits des Autochtones. Cette modification devrait également être appliquée ailleurs dans le texte de la norme où il est question de la reconnaissance des droits des Autochtones (ex. section 1.4 - Principe 11 et section 1.5 - Objectif 8)	Comment addressed with edits to PMs 8.1 & 8.2 and edits in PM 1.2, 4.1, 6.1, PM 10.2, PM 12.1, and PM 14.1.



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		<p>au Canada de clarifier la question de l'existence et de la portée des droits visés par l'article 35, soit par la négociation ou devant les tribunaux. À cet égard, le gouvernement du Canada s'est doté d'une politique sur le règlement des revendications autochtones et les gouvernements provinciaux concernés sont invités à participer à ces négociations en respect de leurs compétences constitutionnelles. Le gouvernement du Québec doit être partie prenante aux processus menant à l'identification des droits des groupes autochtones, dans le respect de ses compétences. Les rôles et responsabilités des tiers doivent donc être conçus dans la perspective où leur capacité d'intervention peut être limitée, ainsi que dans le respect des prérogatives constitutionnelles des gouvernements.</p> <p>À l'heure actuelle, certains groupes autochtones participent à des négociations sur les revendications territoriales globales, alors que d'autres ont porté leurs revendications devant les tribunaux qui ont, dans certains cas, reconnus l'existence de droits ancestraux ou issus de traités. Il est à noter qu'une portion importante du Québec est visée par des revendications de droits et de titres ancestraux, dont l'existence et la portée restent à établir. Il est à noter qu'aucun titre ancestral n'a été établi à ce jour au Québec.</p> <p>Les tiers désirant en savoir davantage sur les communautés autochtones, notamment sur les</p>		



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		droits établis ou revendiqués ou sur les négociations en cours, sont invités à communiquer avec le MFFP.		
314	8	Guidance should stress that consultation must be far enough in advance of operations to allow review and comments back to the company and not have it done at the last moment so as to make the consultation effectively meaningless.		Comment addressed in SFI Section 7 Guidance - Objective 8, Communications with Indigenous Communities.
317	8	Will guidance provided to certified organizations address intellectual property and the use and protection of Indigenous knowledge, particularly on the location of cultural sites?		Comment addressed in SFI Section 7 Guidance - Objective 8.
313	8	Guidance needed for Certified Organizations to ensure that when they share information regarding planned forest operations the information should be shared in a format that is understood by a non-technical, non-agency audience.		Comment addressed in SFI Section 7 Guidance - Objective 8, Communications with Indigenous Communities.
320	8.1	In NB Crown Timber Licensee's are not allowed to work directly with FN. Wording should allow for proper agencies to communicate and make information available.		Comment addressed with edits to PM 8.1.



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321	8.1	We are deeply concerned that the new standard does not explicitly require organizations to obtain Free, Prior and Informed Consent from Indigenous Peoples who could be impacted by organizations' proposed activities. It is not enough to require organizations to be "in compliance with all applicable laws" with respect to the rights of Indigenous Peoples; voluntary certification bodies should go beyond requiring companies to act within the law. SFI references the United Nations Declaration of the Rights of Indigenous Peoples as a resource for organizations, but this reference is far from enough. SFI should, at a minimum, require organizations to obtain Free, Prior and Informed Consent before engaging in operations that impact the traditional territories, resources, and rights of Indigenous Peoples. SFI should additionally require organizations to provide Indigenous communities with significant roles in the independent audit process.		Comments addressed with edits to PMs 8.1 & 8.2, except for the reference to requiring FPIC. FPIC if and where implemented is the purview of federal governments and not the responsibility of Certified Organizations.



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322	8.1	<p>While this issue is relevant in the U.S., it is even more pertinent in Canada, where there are more unsettled claims and contested rights. While the new draft includes more requirements around what it takes to recognize and respect Indigenous Peoples' rights, it does not include Free, Prior, and Informed Consent, which is seen as the most current and respectful form of engagement.</p> <p>Consultation is not required on private land, and the results of consultations with Indigenous people and communities do not have to be used in any way other than to "gauge impact." Include FPIC as a requirement to recognize and respect Indigenous Peoples' rights on both private and public lands.</p>		<p>Comment addressed in part with edits to PMs 8.1, 8.2, and 8.3, with the exception of the reference to requiring FPIC. FPIC if and where implemented is the purview of federal governments and not the responsibility of Certified Organizations.</p> <p>Consultation is not required for lands that are fee-simple ownership however Certified Organization on fee-simple (private) lands are required to respond to inquiries and concerns as per PM 8.3.</p>
323	8.1	In following these Standards, does it make a difference whether the local indigenous people groups are Federally groups recognized or not?		Comment addressed with definition of Indigenous Peoples in Section 14 - Definitions.
319	8.1.	Prefer a bit more clarity around when training is required	"...Where Certified organization acknowledges appropriate, ensure training of personnel and contractors is conducted so that..."	Comment addressed in SFI Section 7 Guidance - Objective 8, Communications with Indigenous Communities.



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324	8.1.1	Does the policy referenced in this standard requirement need to be a stand alone policy or can this commitment/recognition be integrated into an existing publicly available policy, like a Human Rights Policy.		Comment addressed in Ind. 8.1.2. Organization can determine what type of policy best addresses the requirement.
327	8.1.1	Where can certified organizations receive training for their personnel and contractors?		Comment addressed with SFI Section 7 Guidance - Objective 8. SFI is also developing materials for use by SICs and Certified Organizations.
330	8.1.1	<p>La norme doit être appliquée de façon compatible avec l'état du droit au Canada et au Québec, de façon, entre autres, à ne pas remettre en cause le principe de hiérarchie des normes en droit et les bases du droit relatif aux Autochtones au pays.</p> <p>Par ailleurs, les communautés autochtones sont généralement représentées par un conseil de bande élu ou, dans le cas des Inuits, par le conseil municipal d'un village nordique. C'est avec ces représentants officiels qu'il faut généralement entrer en relation. Dans certaines circonstances, cependant, c'est avec d'autres organisations dûment mandatées qu'il faut communiquer. En effet, des organisations de niveau supralocal peuvent parfois représenter des regroupements de communautés autochtones ou des nations entières, en</p>	<p>Il serait pertinent que la politique écrite de l'organisation certifiée porte sur l'établissement et le maintien de relations harmonieuses avec les communautés autochtones concernées, dans le respect des responsabilités qui incombent à l'organisation. Il peut être utile de se référer au document suivant:</p> <p><a href="https://www.autochtones.gouv.qc.ca/publications_documentation/publications/2015-02-document-intention-promoteurs.pdf">https://www.autochtones.gouv.qc.ca/publications_documentation/publications/2015-02-document-intention-promoteurs.pdf</a></p>	Comment addressed in Ind. 8.1.2. Organization can determine what type of policy best addresses the requirement.



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		fonction de la structure de représentation qui leur est propre, ou du mandat qui peut leur être attribué par d'autres organisations.		
325	8.1.1	It appears the enhancements ask licencees to describe the rights of indigeneous communities. How would you envision this happening and what guidance can you provide when this defining of rights is a duty of the Crown and First Nations.		Comment addressed in Ind. 8.1.1 and SFI Section 7 Guidance - Objective 8.
326	8.1.1	In 8.1.1.iii, are these actually covered in ii in the US?		No edit proposed.
329	8.1.1	Define contractors=Contractor Loggers, or does this extend to road crews, chemical applicators, tree planting crews etc.?		Contractors are any individuals/companies hired to perform/provide a service to Certified Organizations.
331	8.1.1.b.i	Reference to UNDRIP in this indicator implies FPIC must be followed, as it is a big part of UNDRIP. Canadian companies are not at a stage that FPIC is even possible. The standard should refer to the sprit of UNDRIP, not UNDRIP itself. The guidance document should be updated to make this clear, and to specify that the Sprirt of UNDRIP cannot override federal, provincial and state laws and regulations .	The indicator is fine as long as the guidance is clear as per the comment.	Noted. See SFI Section 7 Guidance - Objective 8.
328	8.1.1 b. iii	The language leads one to think that treaties were governments granting rights to indigenous peoples, when it was the other way around.	Change to: "...between indigenous peoples and governments"	Edit addressed with Ind. 8.1.1 iii.



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332	8.1.1.c	Recommend SFI develop training outline that can be adapted by Certified Organizations/SICs for their region.		Noted. SFI is developing training materials.
333	8.1.1 c	The Idaho SIC seeks greater clarity on how the Standards and Rule would define “appropriate training” and how such training might change depending on area of operations.		Comment addressed in SFI Section 7 Guidance - Objective 8, Communications with Indigenous Communities.
334	8.1.1 c.	Comment related to training	Training should be provided on intellectual property and protection of Indigenous science and knowledge. Perhaps SFI could facilitate sharing of best practices with Certified Organizations and Indigenous partners.	Comment addressed in SFI Section 7 Guidance - Objective 8, Communications with Indigenous Communities. SFI is developing training materials.
335	8.1.c	It is unclear what the “appropriate” training is, and exactly who should receive this training. Who determines the appropriate level? And are all loggers, tree planters, marking crews, mechanics and other contractors required to have the training?	Recommendation: Clarify who is required to receive training, and how to determine the appropriate level of training.	Comment addressed with SFI Section 7 Guidance - Objective 8.
336	8.2	On Indicator 8.2 - 1.c. I'm assuming that the removal of 'public lands' is correcting redundancy from the Performance Measure language, and not suggesting this indicator applies to private lands.		Comment addressed with edit to PM 8.2





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337	8.2	Require all Certified Organizations to secure Free, Prior, and Informed Consent from Indigenous Peoples prior to conducting operations that may affect their lands, resources, or legal or customary rights.	8.2 Certified Organizations with forest management responsibilities on public lands shall confer with Indigenous Peoples whose rights may be affected by the Certified Organization's forest management practices.	Proposed edit not accepted. FPIC, if and where, implemented is the purview of federal governments and not the responsibility of Certified Organizations.
338	8.2.	<p>The Government of New-Brunswick (GNB) is currently working with various First Nations groups toward enhancing communication and engagement in order to better recognize and respect Indigenous Peoples Rights around forest management practices in New-Brunswick.</p> <p>As we're still at an early stage in the process and we are unsure of the time it will take to achieve the desired outcomes, we are concerned about the potential impact to certified organizations on meeting the various indicators under this performance measure.</p>		Noted. No edit proposed.
341	8.2.1	Indigenous People are not provided an opportunity to review and comment on forest management plans.	Add another sub-indicator specific to management plans, i.e. Indigenous Peoples are provided ample time to review and comment on draft management plans. Certified Organization shall consider input when finalizing or modifying management plans."	Edit addressed with Ind. 8.2.1 e.



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342	8.2.1	Certified Organizations represented on our State Implementation Committee noted that they have extended the offer to local tribal officials to provide input and comment on their operations and received no response. Dialogue requires two parties and can't be forced. The Guidance section provides direction on establishing a communications protocol, but should also recognize that when an affected Indigenous community has indicated that they are not interested in interacting with the Certified Organization, the Certified Organization can document that fact and is no longer required to attempt communications with that community. The Guidance section says, "certified organizations are encouraged to implement communications programs that build on regulated requirements", and "Certified organizations are encouraged to identify communications protocols". Yet the draft Standard says that, "Certified Organizations with forest management responsibilities on public lands shall confer...". The former is a suggestion. The latter is a mandate.	Recommendation: Change 8.2.1 to read, "Certified Organizations with forest management responsibilities on public lands "are encouraged to" confer with Indigenous Peoples whose rights may be affected by the Certified Organization's forest management practices "beyond the level required by law"".	Edit considered but not accepted as it does not improve the requirement.
339	8.2.1	the certified organization should have to develop those protocols with the Indigenous people.	agreed upon protocols instead of appropriate protocols	Edit addressed with Ind. 8.2.1 d.



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340	8.2.1		8.2.1 Program that includes communicating with affected Indigenous Peoples to enable Certified Organizations to secure Free, Prior and Informed Consent prior to management activities.	Proposed edit not accepted. FPIC, if and where, implemented is the purview of federal governments and not the responsibility of Certified Organizations.
344	8.2.1 a-f	As written this Performance Measure requires Certified Organizations to know and understand all six of these items for every indigenous community in their work area. Indigenous communities don't typically share some of this information with outsiders. For example, we have found that "traditional forest-related knowledge" (Performance Measure 8.2.1a) varies from person to person and is largely oral. Some of that information they are unwilling to share with others (e.g., medicinal plants). It would be helpful if the indigenous community would document this knowledge in an accessible manner so that every Certified Organization doesn't have to seek out the same individuals to hear and understand this information. Additionally, Indigenous communities are often unwilling to share locations of "spiritually, historically, or culturally important sites" (Performance Measure 8.2.1b). Some, but certainly not all, are known to the State and can be identified by the State Historic Preservation Office. This Performance Measure should be modified so that it is clear that this is a list of examples of the type of information the	Recommendation: Change Performance Measure 8.2.1 to read, "Program that includes communicating with affected Indigenous Peoples to enable Certified Organizations to "understand Indigenous knowledge and values and incorporate them into their forest planning and management. Examples of this knowledge could include....".	Edit considered but not accepted as it does not improve the requirement.



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		Certified Organization should attempt to document.		
343	8.2.1.e	Clarify this only applies in certain situations	""...Where Certified organization acknowledges appropriate, provide opportunities to review..."	Edit considered but not accepted as it does not improve the requirement.
345	8.2.1e	Tel que formulé dans la version française, cet indicateur offre aux communautés autochtones l'opportunité d'examiner sur le terrain les activités d'aménagement forestier. À notre compréhension, ceci signifie que les opérations ont déjà été réalisées. Il devient alors difficile d'apporter des correctifs si telle est l'intention du SFI. Le libellé de la version anglaise ne fait d'ailleurs aucunement mention de "sur le terrain". Une reformulation est souhaitable pour clairement refléter l'objectif qui est poursuivi. Il est aussi possible que le mot "review" ne soit pas le terme approprié pour la version originale anglaise.	Reformuler l'indicateur 8.2.1e : ...offrir la possibilité d'examiner sur le terrain de commenter les activités d'aménagement forestier prévues à la planification.	Edit considered but not accepted as it does not improve the requirement.
346	8.2.1f	This is redundant, as the Standards require Certified Organizations to “respond to inquiries and concerns received” from anyone, not just from Indigenous communities.	Recommendation: Remove Performance Measure 8.2.1f.	Edit considered but not accepted as it does not improve the requirement.
347	8.3	For private landowners, would active forest advisory committees that include regional Indigenous Peoples representatives as members be considered consultation?	Please provide guidance on this.	Comment addressed with SFI Section 7 Guidance - Objective 8. SFI is also developing materials for use by SICs



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				and Certified Organizations.
348	8.3		8.3. Certified Organizations are encouraged to communicate with and shall respond to Indigenous Peoples whose rights may be affected by forest management practices on their the Certified Organization's private or managed lands	Edit considered but not accepted as it does not improve the requirement. PM 8.3 is for Certified Organizations with private land.
349	8.3	It is very unclear what land this Performance Measure is referring to with the phrase "on their private lands". Is it on the Indigenous person's private land? Is it the Certified Organization's private land? We suspect it is the latter.	Recommendation: Clarify which private lands this Performance Measure refers to in the Standard or in the Guidance.	The private land referenced it that held by the Certified Organization - not the Indigenous community.
350	8.3	What is considered private lands from 8.3 ? reserves? traditional territories?		The private land referenced it that held by the Certified Organization - not the Indigenous community.



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351	8.3	Clause encourages communication with/response to Indigenous Peoples "whose rights may be affected with respect to sustainable forest management practices on their private lands." However, impacts of activity can and likely will extend beyond the bounds of the land they take place on and there may be justified concerns with work happening in proximity to Indigenous lands. Hoping that a reasonable range of impact can be encapsulated, at least generally, by this clause.	Performance Measure 8.3. Certified Organizations are encouraged to communicate with and shall respond to Indigenous Peoples whose rights may be affected with respect to sustainable forest management practices on or reasonably proximal to their private lands.	Edit considered but not accepted as it does not improve the requirement.
352	8.2 & 8.3	Under Objective 8, where do Indigenous Peoples certified lands fall - public (8.2) (a different public) or private (8.3). In many situations tribal lands in the US may overlap with historic landscapes of other tribes.		Noted. No edit proposed.
353	8.2 & 8.3	Why have different requirements for public lands and private lands?		No edit proposed.
354	9	Using the term "Climate Smart" seems an unnecessary buzz word.	Change climate smart to Climate Change Adaptation and Mitigation	Comment considered but not accepted as it does not improve the requirement.
355	9	The title 'Climate Smart Forestry' recalls 'Smart Development' efforts a number of years back that were pretty unpopular. Suggest a more neutral title.	Climate Change Impacts; or Climate and Forest Conservation	Comment considered but not accepted as it does not improve the requirement.



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358	9	How you made your calculations regarding carbon sequestration and wetlands has not been made public. Furthermore, you have not detailed specific requirements to reduce carbon and all other GHG emissions, including a net zero goal.	Please detail specific requirements to reduce carbon and other GHG emissions, INCLUDING a net zero goal! Please make public how you calculated your information about carbon sequestration in wetlands. Thank you!	Comments partly addressed with Obj. 9, PM 9.1 and PM 9.2. However, a net zero goal was not adopted as a requirement.
359	9	A gaping hole in SFI's proposed standard, is the omission of any meaningful obligations for organizations to reduce the carbon emissions associated with their logging operations. SFI acknowledges the threat of climate change, but treats industrial harvesting as a blanket climate solution, stating "We know that when we actively manage our forested landscapes for wood products, we can maintain forests as a carbon sink." While global pressure increases for forest product producers and purchasers to measure, publicly report, and reduce their Scope 1, 2, and 3 emissions, SFI instead vaguely requires organizations to be "aware of the effects of their management on forest carbon dynamics as they relate to climate" and take those considerations "into account." This is particularly concerning in light of evidence that deforested "scars" from widescale industrial logging in Canada's boreal forest have remained for decades after harvesting, indicating that forest managers are severely overestimating replanted commercial forests' ability to recover lost carbon.		Comments partly addressed with Obj. 9, PM 9.1 and PM 9.2. No edits proposed.



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360	9	This new clause is ambitious, challenging, and progressive. Well done.	Nope.	Noted.
361	9	we need clear and measurable definition or requirement around adaption approaches. Objective 9 needs to clearly stand for something in order to be relevant.		Comments addressed with Obj. 9, PM 9.1 and PM 9.2. No edits proposed.
362	9	Requiring CO's to implement climate change strategies will interfere with their ability to participate in carbon markets and monetize those activities.... if you do it first due to Standards, you have lost your additionality.		Comments addressed with Obj. 9, PM 9.1 and PM 9.2. No edits proposed.
363	9	Adjusting language around the requirements for mitigation will help certified orgs to understand the PM in the way that is outlined in the SFI guidance for this new standard, and makes clear that the need to engage in mitigation, is mainly around quantification and preparedness to engage in C mitigation, should it be a policy priority for govts, regions, or should the market drive forestry offsets projects.	Objective 9. Climate Smart Forestry. To ensure forest management activities address climate change adaptation measures and understand the scale of the mitigation opportunity. Measures.	Edit partially addressed with edit to Objective 9.





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364	9	The Minnesota SIC appreciates SFI's efforts to combat climate change through forest management. However, we feel that the new Objective could be altered to provide more clarity, alleviate concerns related to carbon offset markets, and reduce additional burdens placed on Certified Organizations from developing programs to address this objective. In addition, it should be noted that current financial conditions within the forest products industry are putting heavy pressures on already stressed forest management organizations. Any additional burdens on these organizations should be carefully considered as to avoid the potential for them to withdraw lands from the SFI program.		Comments addressed with Obj. 9, PM 9.1 and PM 9.2. No edits proposed.
366	9	The title 'Climate Smart Forestry' recalls 'Smart Development' efforts a number of years back that were pretty unpopular. Suggest a more neutral title. Overall this is a big ask for most certified organizations.	Climate Change Impacts; or Climate and Forest Conservation	Edit considered but not accepted as it does not improve the requirement.



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367	9	I have reviewed the proposed changes. I have concerns about the new climate change objective. There seems to be new requirements for certified bodies to use climate change models to predict future changes to certified forests. The problem I have is that there are a wide variety of USA climate change models that are available with mixed results and reliability. This is a very rapidly evolving science and I think enshrining it in the standard at this point is premature. There are already requirements in the current standard for addressing and monitoring climate change, and I don't think adding a new objective when this science is rapidly evolving is prudent at this time. Also, requiring certified bodies to track greenhouse gas emissions will create a large burden that will cause companies to question whether the benefit they get from SFI certification is worth the extra cost and time.		Comments addressed with Obj. 9, PM 9.1 and PM 9.2. Also, SFI has developed extensive Guidance for this Objective - See Section 7 Guidance - Objective 9. No edits proposed.
368	9	How do these apply to companies who are not in the forestry stage of the supply chain but next stages?		Objective 9 requirements are for the certified organizations and not for downstream entities.
370	9	Does the new Objective #9 (climate smart forestry) also apply to Fiber Sourcing in addition to Forest Management?		No - Objective 9 is a Forest Management Standard requirement only.



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371	9	Has there been an economic analysis of this objective? Including increased cost to implement on the landowner, participant and additional costs to the audit?		No - not possible to do such an analysis given the difference in land-base size and ecological regions.
373	9	Have you considered the implications of having a standard that varies by the size of the organization. This would imply that what one company does is viewed as sustainable and if another company did that same thing it would not be sustainable. What about the impact on other parts of the standard...will some companies have to comply with BMPs but others not because its too hard?		Comment partially addressed with SFI Section 7 Guidance - Objective 9. Regarding size of the company and the threshold level of implementation, the SFI Standards requirements apply the same regardless of size.
374	9	will the quantitative results from these methods be available to those purchasing the fiber?		This would be a decision of the Certified Organization. The standard does not require it.
375	9	It is the subject of tying sustainable forest management to more than just carbon sequestration but ecosystem services that create potentially large additive value over other products and land uses. How will or how can the climate smart forestry element of the standard capture those values and benefits of the overall SFI standard and its value to landowners and ideally consumers.		Comments addressed with Obj. 9, PM 9.1 and PM 9.2. Also, SFI has developed extensive Guidance for this Objective - See Section 7 Guidance - Objective 9. No edits proposed.



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377	9	Regarding size and scale of operation, is this just for the company's SFI certified area? Only part of our forest management area is SFI certified, but will it apply to all our forest lands? Maybe tied to audit scope and what will be looked during an audit.		Objective applies to the lands certified to the SFI Forest Management Standard.
378	9	<p>SFI proposed revised standards and indicators address climate change in Objective 9. That Objective primarily encourages forest managers to consider and evaluate impacts of climate change on their forest productivity. This acknowledgement is a good thing, in that it recognizes climate change as real and shows awareness of potential impacts various forest ecosystems. No serious forest manager can afford to ignore it.</p> <p>The standards and indicators also recognize that forest carbon sequestration may also be an issue which managers consider. But there is no requirement or set of indicators which clearly point managers in this direction. Neither in the Objective 9 climate section, nor with reference to old growth, nor in the context of sustainable harvest, is there an approved direction towards carbon conservation via preservation or longer rotations as a desired outcome.</p>		Comments addressed with Obj. 9, PM 9.1 and PM 9.2. Also, SFI has developed extensive Guidance for this Objective - See Section 7 Guidance - Objective 9. No edits proposed. However, how a certified organization implements the requirements is theirs to decide - longer rotation ages is an option but not a requirement.



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379	9	Should there be a PM to promote sustainably produced, durable forest products?	"Certified Organizations shall promote the use of sustainably produced forest products, which durably sequester renewably produced carbon."	Comment considered but not accepted as it does not improve the requirement.
f	9	The Standard misses the opportunity to safeguard forest areas crucial to ongoing carbon storage, and to encourage forest management that is more effective at sequestering and storing additional carbon. Neither the climate-related Indicators, nor the Standard's other Indicators, require protection of old growth forests, primary forests, peatlands, and other high-carbon ecosystems in certified forests. Indicator 9.2.2 addresses carbon emissions, but it and its Guidance do not require carbon accounting to include the impact of logging high carbon forests. The Indicator also does not require organizations to forgo management activities that emit large amounts of carbon, or that are otherwise less climate-friendly than alternatives. Similarly, another Indicator speaks to enhanced carbon sequestration, but does not encourage the most beneficial and important approach, i.e., a shift to longer harvest rotations in commercially managed forests.	We recommend the Standard be revised to: <ul style="list-style-type: none"> <li>Formally protect forest areas that store the most carbon, e.g., old growth and late successional forest stands in all forest types, as well as peatlands and high carbon areas in the Boreal forest (the world's largest terrestrial carbon sink).</li> <li>Outside of protected areas, maintain carbon stores at the management unit scale and within all timeframes, especially the short-term as we need to address emissions now to ensure climate stability.</li> <li>Encourage use of longer timber rotations, to enhance carbon sequestration and timber productivity, including in second-growth forests whose carbon stocks have been diminished.</li> <li>Require comprehensive forest carbon accounting that accurately</li> </ul>	<p>Comments partially addressed with Obj. 9, PM 9.1 and PM 9.2. Also, SFI has developed extensive Guidance for this Objective - See Section 7 Guidance - Objective 9.</p> <p>How a certified organization implements the requirements is theirs to decide - longer rotation ages is an option but not a requirement. Likewise, implementing a full carbon accounting program is the decision of the Certified Organization.</p>



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			<p>factors-in all carbon pools, including soil carbon and the fate of harvested products, and that addresses actual conditions and management practices in the certified forest.</p> <ul style="list-style-type: none"> <li>• Provide indicators with specific habitat protection and restoration requirements for high priority species (e.g., woodland caribou) and species groups.</li> </ul>	
356	9	Guidance on how auditors will evaluate how these performance measures need to be established for Climate Smart Forestry. Based on how land is governed, geographical conditions, etc. each certified organization will have a different solution space in which they can implement climate change adaptation and mitigation.		Comment addressed with SFI Section 7 Guidance - Objective 9. Climate Smart Forestry.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
357	9	guidance are still in development	again, I'd request opportunities for certified organizations to have ability to review changes to guidance as continued to be fleshed out. No time was spent on covering in webinar for understanding and stated that guidance were still being fleshed out	Comment addressed with SFI Section 7 Guidance - Objective 9. Climate Smart Forestry.
369	9	Is SFI aware of any forest carbon modeling tools, aside from those provided yesterday? If so, can you share them now?		Comment addressed with SFI Section 7 Guidance - Objective 9. Climate Smart Forestry.
372	9	I have concerns on how these standards may be audited. I suspect the audit point would be "IS there a strategy"? I suspect another auditable point would be to prove that a strategy is being followed? Comment, please		Comment addressed with SFI Section 7 Guidance - Objective 9. Climate Smart Forestry.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
381	9	<p>Much of the science surrounding climate change mitigation suggests diversifying forests so that they are more resilient to future change. However, we have several concerns regarding how this can lead to noncompliance of other portions of the Standard or with agency direction. We feel that Certified Organizations need the flexibility to balance climate change objectives with other Standard Objectives related to wildlife habitat, recreation, timber production, and mill species requirements, etc. The following are several examples of possible challenges our member organizations see in implementing some common climate change resiliency strategies.</p> <ul style="list-style-type: none"> <li>• We use Native Plant Community (NPC) data in Minnesota to determine the suite of species suitable for a site. Planting trees not native to that NPC is often not allowed by agency directive.</li> <li>• Not all forests are naturally diverse. Early successional forests (e.g., aspen, jack pine, red pine) often naturally regenerate into near monocultures after disturbance, and then diversify as they age. There are wildlife species adapted to those conditions that cannot thrive without it (e.g., golden-winged warbler). Intentionally diversifying them is not natural or desirable. It should be clear that diversity is found at the site AND the landscape-scale. Having all conditions along the spectrum of potential successional stages represented on the</li> </ul>	<p>Recommendation: Ensure that it is abundantly clear to Certified Organizations and auditors alike that there is sufficient flexibility in the Standard to allow them to balance climate change strategies with other (at times conflicting) strategies and outcomes.</p>	<p>Comment addressed with SFI Section 7 Guidance - Objective 9. Climate Smart Forestry.</p>





Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
		<p>landscape make an entire region resilient to changes in climatic conditions.</p> <ul style="list-style-type: none"> <li>• Most forests in Minnesota are naturally regenerated, not planted. Therefore, it makes it difficult and expensive to introduce new species, and the likelihood of success is very low due to the need to tend them by controlling competition and herbivory from deer. Controlling competition usually requires the use of herbicides, which runs counter to other Standards calling for reduced herbicide use.</li> <li>• Assisted migration has been touted as a means to help trees move on the landscape faster than they could naturally. Studies of the impacts of climate change over the past 40 years do not support this activity. We are concerned that assisted migration is tantamount to introducing exotic species, which is not supported in the Standard. By definition an exotic species is one existing outside of its natural range. Also, planting these species could in the long term lead to conversions, another aspect of the Standard that runs counter to this Objective.</li> </ul>		
365	9	<p>the wording is a bit unclear in its meaning - particularly from an operational standpoint. Suggest revising as noted.</p>	<p>"...To incorporate climate change adaptation and mitigation measures into the forest planning and management process."</p>	<p>Edit considered but not accepted as it does not improve the requirement.</p>



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
376	9	It is unclear if there is an intent to make claims or not about what the objective is doing and how FM program participants are meeting this.		Objective 9 does not have any provision for making claims. Ind. 9.1.4 and Ind. 9.2.4 do require annual reporting to SFI on adaptation and mitigation strategies.
382	9.1	Directly analyzing climate models is beyond the capacity of many certified organizations; better to specify credible sources of climate data, and also states analysis of scenario analysis.	...based on evaluation of credible climate research, modelling, and scenario analysis.	Edit addressed with PM 9.1.
383	9.1	As written, the PM suggests that certified organizations need to use regional climate models, research, and scenario analysis. This should be reworded for additional flexibility, and add regional climate adaptation plans to the list of potential list of resources. It should be clear that this list of potential resources is not all inclusive.	Certified organizations shall develop a program to identify and address climate change risk to forests and forest operations and develop appropriate adaptation objectives and strategies based on analysis of available resources (e.g. regional climate models, research, scenario analysis or regional climate adaptation plans)	Edit addressed with PM 9.1.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
385	9.1	Along with links to current climate models, it would be very useful to list confidence limits surrounding the predictions on your website. Confidence limits are associated with each model, but they usually are not reported, which makes it impossible to interpret their predictions, accuracy and risk.	Certified Organizations shall develop a program to identify and address the climate change risk to forests and forest operations and develop appropriate adaptation objectives and strategies based on analysis of available regional climate models, research, and scenario analysis, including an assessment of the confidence limits and risk surrounding each model analyzed.	Comment considered but not accepted as it does not improve the requirement.
387	9.1	Adjust the list of factors to analyze such that they are examples or options, rather than requirements. This will allow for the analysts at Certified Orgs to apply the best available information at hand, which likely includes many of the same (though not always ALL of the same) risks.	Based on the best available scientific information, Certified Organizations shall identify climate change risks and prioritize them based on impacts, such as the likelihood, nature, scale and longevity of their expected impact to their forest lands or forest tenures.	Addressed by edits to Ind. 9.1.1.
388	9.1	Little to no work has been done in NB. Not sure how we will get impact work done internally? Not sure why this is being pushed so hard so quickly in new standard. Should allow time for studies to be published and FM user to incorporate these findings.		No edit proposed.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
389	9.1	Requiring Certified Organizations to develop objectives and strategies based on "analysis of available regional climate models, research and scenario analysis" is problematic for two reasons. First, regional climate models for many regions are lacking or incomplete at best and fraught with unverified and highly subjective assumptions at worst. Second, inclusion of "scenario analysis" is little more than "what if" and adds no tangible value with potential unnecessary costs.	"...based on a current research and other best available information ." or "...based on best available information."	Addressed by edit to PM 9.1.
391	9.1	We are headed in the direction of addressing these indicators, however some of the science is still uncertain and it is a work in progress for the long-term.	It will likely take years to fully comply with these proposed measures. Suggest that conformance can be a program at various stages of development from conceptual, to development, to implementation. Some of these requirements would logically occur during the management planning cycle. New requirements may very well be "off-cycle" and it will not be possible to go back to retrofit completed plans with a climate analysis.	Comment addressed with SFI Section 7 Guidance - Objective 9.
394	9.1	I would also encourage SICs to consider collaborating with the various regional University research co-ops that exist.		Addressed with edits to PM 9.1



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
396	9.1	Performance Measure 9.1. dictates that certified organizations shall develop a climate change program.	Recommendation: We ask for more flexibility in this Performance Measure by changing the word "shall", to the word "may". Also, provide a phase-in period for this PM of minimum 5 years.	Comment considered but not accepted as it does not improve the requirement.
384	9.1	This Performance measure should be dealt with at the SIC level since many smaller organizations do not have the resources to thoroughly review this subject area. This can also keep SICs relevant.		Comment addressed with PM 9.1.
386	9.1	Suggest that organizations may wish to undertake this type of effort collaboratively.	Insert at start "Individually or collectively,"	Edit addressed with PM 9.1.
392	9.1	Given that many adaptation strategies may involve conversion of stands to novel cover types, how do we reconcile this with Objective 1 and the avoidance of conversion?		Comment addressed with PM 9.2.
393	9.1	Some climate change impact predictions are based on flawed projections of GHG emissions because population growth and economic growth rates that have not come to pass. They also provide a range of predicted outcomes. Some folks use only the worst case scenarios to make decisions. How does a program participant select the "best" science and determine which projection scenario guides their decision-making?		Comment addressed with SFI Section 7 Guidance - Objective 9.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
397	9.1	Performance Measure 9.1. states that the “adaptation objectives and strategies based on analysis of available regional climate models, research, and scenario analysis.” There is a penchant to apply the worst case scenario when it comes using models to predict the impacts of climate change (Hausfather and Peters 2020), which can accentuate the most dire predictions while underrepresenting other potential outcomes. Additionally, Handler et al., 2014 states, “Process models have several assumptions and uncertainties that should be taken into consideration when applying results to management decisions. Process models rely on empirical and theoretical relationships that are specified by the modeler. Any uncertainties in these relationships can be compounded over time and space, leading to an erroneous result. “It can be difficult to determine the correct climate-related forest management actions given the range of potential outcomes predicted in the climatic models, especially as it relates to the amount of precipitation and drought events that could directly impact the potential vegetative responses. We are fortunate to have a lot of forest-related climate change studies to draw upon in the Lake States. These models can help with planning and decision making surrounding the suite of potential impacts of climate upon forests. But Certified Organizations must be allowed sufficient flexibility to interpret modeled outcomes,	Recommendation: Make it abundantly clear to Certified Organizations, as well as to auditors, the appropriate degree of model consideration, the expected documentation of such, and the amount of staff and contractor knowledge that is required in order to meet the Standard.	Comment addressed with SFI Section 7 Guidance - Objective 9.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
		consider them as they relate to their own range of organizational objectives, and apply them as they see fit.		
390	9.1	This performance measure may benefit from splitting the rationalist planning approach and a scenario or resilience approach. Often the climate vulnerabilities are not known, or are highly uncertain at the spatial and temporal scale of forest management. Thus, in parallel, it is important to improve the resilience of forests to stressors, to cultivate greater adaptive capacity. It is not an either/or. Where there is certainty, the rationalist approach is good, but where there is high uncertainty, it is better to build resilience. Both are needed. Building resilience may mean (in the short term) allowing or cultivating stressors to give the system greater capacity to adapt in the future.	2. Certified Organizations shall develop an adaptation plan to address priority climate change risks, which considers approaches for potential adaptive management. Where high uncertainty exists, adaptation plans shall incorporate approaches to increase forest resilience.	Edit considered but not accepted as it does not improve the requirement.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
395	9.1		<p>The following edit moves indicators b &amp; c from Performance Measure 9.2 into indicator 2 of Performance Measure 9.1.</p> <p>Indicator 2. Certified Organizations shall develop an adaptation plan to address priority climate change risks, which considers approaches for potential adaptive management such as:</p> <ul style="list-style-type: none"> <li>a. shifting southern latitude seed zones incrementally northward and upward in elevation, as appropriate, to account for predicted warming</li> <li>b. silvicultural activities to limit the impacts from wildfire, disease or forest pests,</li> <li>c. adjustments to forest management practices , as appropriate.</li> </ul>	Edit considered but not accepted as it does not improve the requirement.
398	9.1.	New indicator	Individually or collaboratively participate in or support research that clarifies the climate change adaptation and mitigation measures resulting from management strategies.	Edit considered but not accepted as it does not improve the requirement.





Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
399	9.1.1	As written, the indicator suggests that organizations must include likelihood, nature, scale and longevity of impacts when prioritizing. We suggest adding flexibility by making it clear that this list is not all inclusive in terms of considerations and that an organization can fulfill the requirement by considering only some of these factors.	Based on best scientific information, certified organizations shall identify climate change risks and prioritize them based on relevant factors (e.g. likelihood, nature, scale, and longevity of impacts). Relevant factors for prioritization will vary by organization, and may take into account other factors not listed here.	Edit considered but not accepted as it does not improve the requirement.
406	9.1.1	reference to "longevity" is not needed	"...likelihood nature, and scale of their expected impact..."	Edit addressed with Ind. 9.1.1.
403	9.1.1	Use the specific descriptors in 9.1.1 that have been requested to be removed (based on the likelihood, nature, scale and longevity of their expected impact) and place in the guidance section with the clause "such as" before them to provide examples of what could be included in the identification and prioritization effort.		Edit addressed with Ind. 9.1.1 and SFI Section 7 Guidance - Objective 9.
400	9.1.1	The requirements in 9.1.1 are overly prescriptive and would be challenging to scale up or down based on Certification Organization size and forest ownership structure. We request altering this language to provide flexibility, allow for collaboration, and allow consideration related to the scale of operations.	Certified Organizations shall, individually and/or through cooperative efforts, utilize credible research and scientific information to identify and prioritize climate change risks on their forest lands or forest tenures relative to scale.	Edit addressed with Ind. 9.1.1 and SFI Section 7 Guidance - Objective 9.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
401	9.1.1	Use the specific descriptors in 9.1.1 that have been requested to be removed (i.e., based on the likelihood, nature, scale and longevity of their expected impact) and place them in the guidance section with the clause "such as" before them to provide examples of what could be included in the identification and prioritization effort.		Comment addressed with Ind. 9.1.1 and SFI Section 7 Guidance - Climate Smart Forestry.
402	9.1.1	The requirements in 9.1.1 are overly prescriptive and would be challenging to scale up or down based on Certification Organization size and forest ownership structure. We request altering this language to provide flexibility, allow for collaboration, and allow consideration related to the scale of operations.	Certified Organizations shall, individually and/or through cooperative efforts, utilize credible research and scientific information to identify and prioritize climate change risks on their forest lands or forest tenures relative to scale.	Edit addressed with Ind. 9.1.1.
407	9.1.1	Anticipated severity of impact is not included as a factor for consideration.	Add "severity", i.e. "... scale, severity and ..."	Edit addressed with Ind. 9.1.1.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
404	9.1.1		<p>9.1.1 Based on best scientific information, Certified Organizations shall identify and address incorporate opportunities to enhance carbon sequestration on the forests they own or manage into the management plan , including considering factors such as :</p> <ul style="list-style-type: none"> <li>a. use of longer timber rotations</li> <li>b. improved growth rates toward the enhancement of forest carbon pools (e.g., through improved seed selection, plantation survival, stocking levels, choice of species, thinning, competitions reduction, fertilization , reforestation and/or afforestation,</li> <li>c . silvicultural activities to limit the impacts from wild fire, disease or forest pests,</li> <li>d . adjustments to forest management practices , as appropriate , such as expanded riparian zones</li> </ul>	Edit considered but not accepted as it does not improve the requirement.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
405	9.1.1	Performance Measure 9.1.1. says, “Based on best scientific information, Certified Organizations shall identify climate change risks and prioritize them based on the likelihood, nature, scale and longevity of their expected impact to their forest lands or forest tenures (emphasis added)”. As written, this requires certified organizations to consider all four of these factors during their prioritization process or risk being noncompliant.	Recommendation: Consider re-writing this to add flexibility, “...identify climate change risks and prioritize them based on impact factors (e.g., the likelihood, nature, scale and longevity of their expected impact to their forest lands or forest tenures)”.	Edit considered but not accepted as it does not improve the requirement.
408	9.1.1	Based on best scientific information, Certified Organizations shall identify climate change risks and prioritize..... With the incredible quantity of information out there on this topic who defines “best.” Recommend changing to credible.	"credible"	Edit addressed with Ind. 9.1.1.
409	9.1.2	This indicator implies a "stand alone" climate adaptation plan is necessary.	Certified organizations shall develop an adaptation plan, or incorporate adaptation strategies into existing plans, to address priority climate change risks, which considers potential for potential adaptive management.	Edit addressed with Ind. 9.1.2. Certified Organization can determine how best to develop this plan.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
410	9.1.3	You might consider adding a link to your website for the Seedlot Selection Tool (SST) developed by Oregon State University in collaboration with others ( <a href="https://seedlotselectiontool.org/sst">https://seedlotselectiontool.org/sst</a> ). It is one more tool to help people look at current and future climate and potential seed sources suited to their current or future planting environments.	Certified Organizations shall document how their adaptation plan objectives and strategies match seed sources to planting environments over the expected life of the trees and fit within broader regional climate adaptation strategies and plans, where they exist.	Edit considered but not accepted as it does not improve the requirement.
411	9.2	This performance measure is very concerning for organizations who are currently enrolled in or considering carbon sequestration projects and participation in carbon offset markets. Standard carbon offset programs (e.g. American Carbon Registry) require that projects sequester carbon in addition to "business as usual" conditions. This PM would effectively make these practices the new "business as usual" condition or operational norm, and could jeopardize an organizations ability to participate in carbon offset markets. Further, it is not clear what the scope of the PM is. Does this PM relate to net carbon dynamics of the forest, of emissions related to management practices, vehicle/equipment emissions?	Certified organizations shall have a program to identify opportunities for climate change mitigation associated with its forest operations.	Proposed edit addressed with edit to PM 9.2.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
412	9.2		<p>Revise Performance Measure 9.2 in the following way: Performance Measure 9.2. Certified Organizations shall have a program to identify and address opportunities for climate change mitigation associated with to reduce emissions from its forest operations or increase the utilization of biomass and solid wood products.</p> <p>Indicators:</p> <ol style="list-style-type: none"> <li>1. Support initiatives to utilize forest biomass residues that replace fossil fuels.</li> <li>2. Support initiatives that foster the use of mass timber.</li> <li>3. Support initiatives that foster the utilization of forest biomass residues to avoid open burning.</li> <li>4. Support initiatives that foster the use of paper packaging in lieu of plastic.</li> </ol>	Comment considered but not accepted as it does not improve the requirement.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
413	9.2	Instead of "the best scientific information", use "the best available scientific information" or "the best available information" in this case, because "the best information" is unrealistic to attain, and "the best available scientific information" and "the best available information" has a particular, and transferrable, practical definition under law (such as ESA). This is a more appropriate bar, and landowners are used to implementing it. Using "the best available information", and deleting the term "scientific" in this location, acknowledges that there is information beyond just "scientific information" (EG: economic data, policy opportunities, state or federal goals) that can help orgs to identify opportunities to enhance carbon sequestration on the forests they own or manage	<p>Performance Measure 9.2. Certified Organizations shall have a program to identify opportunities for climate change mitigation associated with its land holdings and role/s within state and federal goals.</p> <p>Indicators: Within 4 years of adoption of this standard, Certified Organizations will need to demonstrate the following.</p> <p>1. Based on the best available information, Certified Organizations shall identify opportunities to enhance carbon sequestration on the forests they own or manage considering factors such as:</p> <ul style="list-style-type: none"> <li>a. improved growth rates toward the enhancement of forest carbon pools (e.g., through improved seed selection, plantation survival, stocking levels, choice of species, thinning, competition reduction, fertilization), reforestation and/or afforestation,</li> <li>b. silvicultural activities to limit the impacts from wildfire,</li> </ul>	Comment considered but not accepted. Task Group believes that the 4-year phase in period is not realistic.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
			disease or forest pests, c. adjustments to forest management practices, as appropriate. 2. Based on best scientific information, Certified Organizations shall identify baseline forest carbon scenarios for their land.	
414	9.2	As per the above point, if it is referring to offsets for greenhouse gas emissions, I don't agree that such a program is required. The Environmental Product Declaration for dimensional lumber shows it is a net carbon sink when accounting for carbon emissions during harvest, manufacturing and disposal. i.e. 44% of the dry weight is stored permanently in landfills, offsetting the amounts released during production.	Remove this indicator as the carbon permanently stored in the wood itself offsets the greenhouse gas emissions produced during harvest, manufacture and decay.	Comment considered but not accepted.
416	9.2	Some concern that PM 9.2 may provide complications for additionality criteria associated with carbon offset programs (i.e. ACR), was this considered and investigated with carbon registries such as ACR.		Comment addressed with edits to PM 9.2.





Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
417	9.2	<p>Can we get clarification on what identify and address means in the context of 9.2.1 and 9.2.2. Is this practice-based or does it require that we measure and quantify the impact of the practices that are being implemented?</p> <p>Our preference would be that this remains based on implementing practices that science shows can positively impact carbon sequestration and GHG emissions.</p>		Comment addressed with Obj. 9, PM 9.1 and PM 9.2. Also, SFI has developed extensive Guidance for this Objective - See Section 7 Guidance - Objective 9.
418	9.2	Focusing on implementing forestry practices that have proven useful in climate change mitigation rather than seeking to quantify GHG emissions or carbon stocks would be much more applicable to the scale and scope of most certified organizations.		Comment addressed with edits to PM 9.2.
419	9.2	Only speaks to sequestration and does not mention carbon storage. Makes a big difference to forest management in terms of age-class structure and species composition. Only talks in terms of trees, yet the largest carbon pool is in the soil. Doesn't mention carbon storage in durable wood products.		Comment addressed with edits to PM 9.2.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
421	9.2	Regarding the suggested 4 year phase in period. Allow a phase in period to keep the door open to smaller landowners and smaller orgs with less capacity to hire experts in analyzing forest stocks.	<p>Performance Measure 9.2. Certified Organizations shall have a program to identify opportunities for climate change mitigation associated with its land holdings and role/s within state and federal goals.</p> <p>Indicators: Within 4 years of adoption of this standard, Certified Organizations will need to demonstrate the following.</p> <ol style="list-style-type: none"> <li>1. Based on best scientific information, Certified Organizations shall identify opportunities to enhance carbon sequestration on the forests they own or manage considering factors such as: <ol style="list-style-type: none"> <li>a. improved growth rates toward the enhancement of forest carbon pools (e.g., through improved seed selection, plantation survival, stocking levels, choice of species, thinning, competition reduction, fertilization), reforestation and/or afforestation,</li> <li>b. silvicultural activities to limit the impacts from wildfire,</li> </ol> </li> </ol>	Edit considered but not accepted. Task Group believes that the 4-year phase in period is not realistic.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
			<p>disease or forest pests, c. adjustments to forest management practices, as appropriate.</p> <p>2. Based on best scientific information, Certified Organizations shall identify baseline forest carbon scenarios for their land.</p>	



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
422	9.2	<p>This PM reads, “Certified Organizations shall have a program to identify and address opportunities for climate change mitigation associated with its forest operations” (emphasis added). This PM will force Certified Organizations to implement actions under Indicator 1 a-c to mitigate climate change. Therefore, SFI will interfere with potential and actual carbon markets. If a forest landowner takes climate mitigation actions before signing up for a carbon credit program it jeopardizes their ability to sell credits on those activities at a later date. To qualify for carbon offset credits you must pass an “additionality test” to prove that what you plan to do is beyond your current standard practices. This PM interferes with that process. Also, some states are considering developing their own carbon offset markets. Public land agencies in those states may wish to hold off on entering a market until they can use their own. So actual implementation of actions to address climate change mitigation may be years off for them. Remove all references that could be interpreted as direction to landowners to actively reduce carbon emissions or enhance carbon capture. This could too easily be interpreted as a requirement to mitigate climate change, which is beyond the scope of a forest management standard. The focus of this Performance measure must be shifted to quantifying emissions and possible actions that could increase carbon storage only.</p>	<p>Recommendation: Remove the need to “address” opportunities. Less preferable would be to change it from “shall” to “may”. Also, add a 5 year phase in period for this Performance Measure.</p>	<p>Comment considered but not accepted. Task Group believes that the 5-year phase in period is not realistic.</p>



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
423	9.2	The indicator is not clear on what is meant by a "identify and develop a program to address greenhouse gas emissions". What would such a program look like? Are they referring to offsets or something else? Is monitoring and reporting enough? What is meant by addressing emissions? Why identify and develop and not just develop?	Needs clearer language or sub-bullets to clarify what this is asking for.	Comment addressed with Ind. 9.2.2 and SFI Section 7 Guidance - Climate Smart Forestry.
415	9.2	Include lengthening rotations and designating additional areas for reserves, expanded riparian areas, etc. Develop specific, actionable, auditable practices to enhance carbon sequestration and mitigate harvest/processing emissions, which will help SFI make credible claims about its climate impact.		Comment addressed with PM 9.2.
420	9.2	Remove the words "and address", as it implies the need to mitigate atmospheric C emissions from other sectors, which would be inappropriate in a certification standard. Such language may actually stifle the development of expertise with forest carbon project analysis and development, because it would reduce certified organizations ability to show additionality for any C offset projects they later pursue (after the standard is in place). The ambiguity around whether or not certified orgs are required to offset C emitted from other sectors is unacceptable. Reduce the ambiguity, by removing language around "and address", or by finding another way to make it very clear that certified orgs are not expected to sequester/ store additional carbon (above baseline/ BAU)	Performance Measure 9.2. Certified Organizations shall have a program to identify opportunities for climate change mitigation associated with its land holdings and role/s within state and federal goals. Indicators: Within 4 years of adoption of this standard, Certified Organizations will need to demonstrate the following. 1. Based on the best available information, Certified Organizations shall identify opportunities to enhance	Comment addressed with PM 9.2.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
			<p>carbon sequestration on the forests they own or manage considering factors such as:</p> <ul style="list-style-type: none"> <li>a. improved growth rates toward the enhancement of forest carbon pools (e.g., through improved seed selection, plantation survival, stocking levels, choice of species, thinning, competition reduction, fertilization), reforestation and/or afforestation,</li> <li>b. silvicultural activities to limit the impacts from wildfire, disease or forest pests, c. adjustments to forest management practices, as appropriate.</li> </ul> <p>2. Based on the best available scientific information, Certified Organizations shall identify baseline forest carbon scenarios for their land.</p>	



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
424	9.2.	Indicator 2 requires a program to address GHG emissions whereas the associated guidance refers to quantifying GHG emissions, but does not appear to require quantification in the text of the guidance. Language needs to be consistent to aid interpretation of the expectation for meeting this PM.	In Guidance for 2.2, replace “quantifying” in title with “addressing”. For 9.2.2 in the guidance document, in the second sentence of the first paragraph change "conduct a full inventory of greenhouse gas emissions" to "conduct a full or partial inventory of greenhouse gas emissions". Note that Indicator 9.2.2 address only greenhouse gas emissions, so the focus of the guidance document should be better aligned with less emphasis on quantifying carbon storage. Add to the start of the second paragraph "Where program participant elects as part of their program to address greenhouse gas emissions, sources of models and tools to quantify local, regional and national level forest carbon storage that may assist in addressing carbon storage or emission calculations....." remove "storage" and remove "storage of".	Comment addressed with SFI Section 7 Guidance - Objective 9.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
425	9.2.1	As written, this will complicate and jeopardize organizations ability to participate in carbon offset markets.	Based on best scientific information, certified organizations shall identify opportunities to enhance net carbon balance on forests they own or manage considering factors such as:	Edit addressed with PM 9.2.
426	9.2.1	Suggest the following language to provide additional clarity.	1. Based on best scientific information, Certified Organizations shall identify and address opportunities to enhance carbon sequestration on the forests they own or manage considering factors such as: a) improved growth rates (e.g., improved seed selection, plantation survival, stocking levels, choice of species, thinning, competition, reduction, fertilization), b) reforestation and/or afforestation, c) activities to limit the impacts from wildfire, disease, or forest pests, d) adjustments to forest management practices, as appropriate.	Edit addressed with Ind. 9.2.1.





Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
427	9.2.1	Suggest the following language to provide additional clarity.	1. Based on best scientific information, Certified Organizations shall identify and address opportunities to enhance carbon sequestration on the forests they own or manage considering factors such as: a) improved growth rates (e.g., improved seed selection, plantation survival, stocking levels, choice of species, thinning, competition, reduction, fertilization), b) reforestation and/or afforestation, c) activities to limit the impacts from wildfire, disease, or forest pests, d) adjustments to forest management practices, as appropriate.	Edit addressed with Ind. 9.2.1.
428	9.2.1	"shall address" - this may be interpreted as all opportunities will be addressed.	prioritize and address opportunities that are feasible and implement some of these with the intent to reduce GHG/increase carbon sync.	Edit considered but not accepted as it does not improve the requirement.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
429	9.2.1	We are still exploring the scientific literature to better understand the costs and benefits of mitigation and adaptation strategies. We do not understand as yet what the long-term versus short-term costs and benefits are of different management approaches, nor the spatial scale at which those practices might be most effective. Full life-cycle analyses will be necessary to factor in all of those costs and benefits, and the impacts of those practices on those other things that we manage for (wildlife habitat, clean water, social and economic factors etc.). In other words, we are trying to apply a climate lens to all of the things that we do, but simply applying some adaptation or mitigation practices will have impacts on other aspects of forest management, that need to be looked at more holistically. This will not happen overnight, and while we are moving in this direction, it will likely take years to fully comply with these proposed measures.	It will likely take years to fully comply with these proposed measures. Suggest that conformance can be a program at various stages of development from conceptual, to development, to implementation. Some of these requirements would logically occur during the management planning cycle. New requirements may very well be "off-cycle" and it will not be possible to go back to retrofit completed plans with a climate analysis.	Comment addressed with SFI Section 7 Guidance - Objective 9.
430	9.2.1	Suggest being consistent with wording in the Guidance section and change so that it sounds more like an Indicator.	Change to "Indicator 9.2.1 - Identify and address options to enhance carbon sequestration and reduce GHG emissions associated with forest management operations considering factors such as:"	Edit addressed with Ind. 9.2.1.
433	9.2.1 a -c		Recommendation: Make it abundantly clear that these are options, not mandates.	Edit addressed with Ind. 9.2.1 a.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
431	9.2.1.a	SFI to clarify what "reforestation" means in this indicator. Is it intended to be consistent with the intent of "reforestation" in FM Indicator 2.1?		Comment addressed with Ind. 9.2.1 a.
432	9.2.1.a	SFI to clarify what reforestation means in this indicator. Is it intended to be consistent with reforestation in FM Indicator 2.1?		Comment addressed with Ind. 9.2.1 a.
434	9.2.1 b	See first comment on inconsistent use of the term 'pests'	Recommend changing to: "...the impacts from wildfire or forest pests,"	Edit addressed with Ind. 9.2.1 a.
435	9.2.1 b.	Building resilience may mean (in the short term) allowing or cultivating stressors to give the system greater capacity to adapt in the future. Perhaps this sub-bullet should be reworded or eliminated.		Edit addressed with Ind. 9.2.1 a.
436	9.2.1 c	This indicator could affect the possibility of certified companies to develop and register carbon offset projects, because it can affect the additionality required by of those projects.	The language in 1. be changed to clarify that a certified organization does not necessarily need to address each of the factors listed.	Edit addressed with Ind. 9.2.1 a.
437	9.2.1 c	This indicator would make it very difficult to register carbon projects on properties owned by the certified organization. This would in effect limit the potential additionality of a project that would be created by a change in management practices. It would create a policy requirement instead of encouraging voluntary participation in the carbon markets	I propose indicator 1.C be removed and the language in 1. be changed to "may include" to clarify that a certified organization does not need to specifically address each of the suggested factors.	Edit addressed with Ind. 9.2.1 a.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
438	9.2.2	This indicator is not sufficiently defined. Currently it is unclear the scope in which organizations need to be addressing greenhouse gas emissions. We recommend that this indicator be altogether removed, and addressed by adding as a sub indicator to 9.2.1. This indicator could also provide a barrier to entry for carbon offset programs by eliminating emissions reductions from the suite of available project types available to certified organizations.		Comment considered but not accepted as it does not improve the requirement.
439	9.2.2	only 2 models available for NB and they are cumbersome	use best available info to identify ghg impact.	Edit addressed with Ind. 9.2.2.
440	9.2.2	Need to provide clarity on what is specifically to be addressed in a GHG program. It should be limited to direct emissions (scope 1) resulting from FM operations (e.g., cutting, hauling, road preparation, transportation, fertilization, slash management) and should not include carbon impacts due to the removal of trees from the tract.	Based on best scientific information, Certified Organizations shall identify and develop a program to address direct greenhouse gas emissions from forest management activities on the forests they own or manage (e.g., cutting, hauling, fertilization, road preparation, site preparation, slash management).	Edit addressed with Ind. 9.2.2.
445	9.2.2	This indicator is not clear regarding what the expected role of the certified organization would be regarding the development of a program to address GHGs would be. This is too open ended and could result in an interpretation that creates a large accounting cost for certified organizations. Would this require certified	I propose indicator 2 be removed from the performance measure.	Comment considered but not accepted as it does not improve the requirement.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
		organizations to address GHGs from all forest operations including work done by contractors?		
446	9.2.2	A program to address greenhouse gas emissions needs to be further explained. What is the intended scope of this program? Carbon emissions from certified forests? Fleet emissions? Impacts of energy use by certified organizations?	I suggest deleting this indicator even if it can be tightly tied to sustainable forestry operations. Its purpose is not apparent.	Comment considered but not accepted as it does not improve the requirement.
447	9.2.2	Indicator 2 = "...develop a program to reduce greenhouse gas", within Performance Measure 9.2 = "...shall have a program to identify and address opportunities..." Is this meant to say develop a program within a program? What would that look like? Should it instead be a greenhouse gas reduction plan or practice(s) within the larger program?	Keep "program" in Performance Measure 9.2; and either 1. Replace "program" in Indicator 2 with "plan" AND define "plan" in Definitions; or 2. Replace "program" in Indicator 2 with "practice(s)" since it's defined.	Edit considered but not accepted as it does not improve the requirement.
448	9.2.2	Suggest being consistent with wording in the Guidance section and change so that it sounds more like an Indicator	Change to "Indicator 9.2.2 - Quantify GHG emissions in forest management operations"	Edit considered but not accepted as it does not improve the requirement.
441	9.2.2	This wording talks about program and addressing greenhouse gas emissions. It does not imply quantifying, guidance for this section needs to be adjusted for consistency.	See Guidance comments for 9.2	Comment addressed with SFI Section 7 Guidance - Objective 9.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
444	9.2.2	This is too open and could result in that certified companies may have big additional costs trying to account for GHGs emissions.	There have to be a more specific guidelines to this indicators, to clearly define what is required in term of GHG emissions. Would a literature review suffice to quantify GHG emission? It would be better to focus on processes to reduce GHGs rather than measuring or quantifying them.	Comment addressed with SFI Section 7 Guidance - Objective 9.
443	9.2.2	forest management should not be required to address greenhouse gas emissions. This goes well beyond scope and intent of PEFC framework. Strongly recommend this indicator be dropped or at least moved to fiber supply, who could better address GHG emissions	Delete 9.2.2 in its entirety	Edit considered but not accepted as it does not improve the requirement.
451	9.2.2		Consistent with Guidance, add at end "in forest management operations."	Edit considered but not accepted as it does not improve the requirement.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
442	9.2.2	<p>Performance Measure 9.2.2. states, “Based on best scientific information, Certified Organizations shall identify and develop a program to address greenhouse gas emissions.” This simple sentence has huge implications. For one, it is unclear if it means emissions related to timber harvesting, or if it includes all greenhouse gas emissions associated with mill operations as well. What about GHG emissions from prescribed fire, pile burning, decomposition due to lack of management and subsequent increased mortality, and potential wildfires? As one reviewer stated, “This looks like it was added at the last minute without much thought.” Since it is only in the Forest Management Standard we will work on the assumption that it relates to vehicle emissions associated with forest management activities. Consider the following:</p> <ul style="list-style-type: none"> <li>• In Minnesota, loggers purchase timber contracts on an open market and then cut the timber at the behest of the landowner, thus serving as de facto contractors. It is beyond the landowners’ authority to influence the contractor’s choice of equipment type, age, and efficiency. It would be against laws and policies for a public agency to discriminate by equipment. A private landowner may have more control but would still be unlikely to pass over a good operator with older equipment for a bad operator with new equipment.</li> <li>• Public agencies must adhere to state</li> </ul>	<p>Recommendation: Given the issues with this Performance Measure we recommend removing it altogether. At a minimum it should be scaled back into a “may” rather than a “shall”, and the words “and develop a program to address” should be stricken. Certified Organizations should be given up to 5 years to identify their emission sources and determine their amounts. There should be no mandate to implement any carbon reduction measures.</p>	<p>Edit considered but not accepted as it does not improve the requirement.</p>



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
		<p>purchasing contracts as well as fleet purchasing and maintenance policies. They have large fleets of highway and off-road vehicles, some of which serve multiple purposes besides timber operations. They simply cannot insist upon purchasing newer vehicles or dictate fuel efficiency requirements solely for the forestry department. In addition, given the current condition of the forest products industry, small agencies dependent upon timber receipts for their operating funds will have even less money to spend on capital upgrades. The current trend will actually be towards longer fleet rotations.</p> <ul style="list-style-type: none"> <li>• When an entity enters a carbon market they do have to quantify their greenhouse gas emissions, and reduce them to earn carbon credits. See the note above regarding the perils of addressing it now. The tools and budgets listed in Table 2 are all part of the carbon budget and carbon offset process when one sells carbon credits. Again, this requirement could severely jeopardize the ability for organizations to enter carbon offset markets by changing the regional standard practice. In essence SFI is mandating that Certified Organizations implement changes that have monetary value, but for which they are offering nothing in return.</li> </ul>		





Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
450	9.2.2	Inclusion of the performance measure is outside the scope of the Forest Management Standard due to the lack of a clear forest management indicator. The Idaho SFI SIC requests removal of the performance measure.		Comment considered but not accepted as it does not improve the requirement.
449	9.2.2	9.2.2 should reference carbon balance as in the guidance rather than GHG emissions specifically - that reference could be interpreted to require GHG accounting for all equipment, etc.		Edit addressed with Ind. 9.2.2.
452	9.2.2	Need to provide clarity on what is specifically to be addressed in a GHG program. Request that it be limited to direct emissions (scope 1) resulting from FM operations (e.g., cutting, hauling, road preparation, transportation, fertilization, slash management) and should not include carbon impacts due to the removal of trees from the tract. (Also see next comment on guidance)	Based on best scientific information, Certified Organizations shall identify and develop a program to address direct greenhouse gas emissions from forest management activities on the forests they own or manage (e.g., cutting, hauling, fertilization, road preparation, site preparation, slash management).	Comment addressed with Ind. 9.2.2 and SFI Section 7 Guidance - Climate Smart Forestry.
453	10	We are concerned with addition of the word, "International." We are not aware of international law that affects forest management in PA. What does SFI have in mind with adding this?	None. But further clarification or guidance needed.	Comment considered but not accepted as it does not improve the requirement.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
454	10	Elevate the issues of health and safety of workers.	Consider adding an Indicator 10.3 to specifically address health and safety of workers. Look at CoC Indicators 8.2.4 and 8.2.6 for guidance.	Comment addressed with Ind. 11.1.2.
455	10	Does not refer to an internal audit, that may be the intent but it speaks of review, not audit. And the multisite approach in Section 10 speaks to internal audit. This all needs to connect.		Comment addressed with Objective 17.
456	10	Legal and Regulatory Compliance – it is much more than just compliance. There is also a huge need to examine the effectiveness of these and to amend and/or develop new laws and regulations. Also, what about policy?		Development of new laws and regulations is the role of governments.
457	10.1	Inclusion of "social" laws appears to be redundant with PM 10.2 which focuses specifically on compliance with applicable social laws.	Delete "social" from PM 10.1	Edit addressed in PM 11.2.
458	10.1.1	What is the purpose of "in appropriate locations"	Remove "in appropriate locations" as "all relevant" is adequate enough.	Edit addressed in Ind. 11.1.1.
459	10.1.1	"“Access to relevant laws and regulations in appropriate location" could be erase	Suggest: “Access to relevant laws and regulations”.	Edit addressed in Ind. 11.1.1.
460	10.1.1	More important than access to laws, which is typically universal in North America, is familiarity with and knowledgeable of applicable laws and regulations.	Change "Access to" to "Familiar with and knowledgeable of ..."	Edit addressed in Ind. 11.1.1.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
461	10.1.2	As currently worded inference is that the CO is not yet in compliance e.g. must "achieve" compliance.	Replace "achieve" with "maintain".	Edit considered but not accepted as it does not improve the requirement.
462	10.2	Language regarding compliance is inconsistent with PM 10.1.	Delete "... take appropriate steps to ..." so the PM simply states "... comply with ..." which is consistent with PM 10.1.	Proposed edit addressed in PM 11.2.
463	10.2	Structure and language of Indicators is currently different from that of PM 10.1 despite having identical purposes as applied to different sets of laws.	Restructure the Indicators to functionally mirror those of PM 10.1 while retaining the two existing Indicators for PM 10.2. e.g. add three additional indicators that mirror 10.1.1 - 10.1.3	Comment considered but not accepted as it does not improve the requirement.
464	10.2.1	Treatment of civil rights, equal employment, gender equality, etc. Could be mirrored in the wood producer training requirements in place of wage and hour rules and employment laws.		Comment considered but not accepted as it does not improve the requirement.
465	10.2.1	"diversity inclusion" is an awkward phrase and to be candid, potentially offensive to some. The phrase most commonly used so "diversity, equity and inclusion". Additionally "gender equality" could be perceived as excluding the rights and needs of the non-binary community. The full phrase "diversity, equity, and inclusion" is more inclusive and less subject to be misinterpreted. Use of "equity" is more appropriate than "equality"	Use "diversity, equity and inclusion" and move to end of indicator so it is overarching. "...equal employment opportunities, anti-discrimination.....right to organize, occupational health and safety and diversity, equity and inclusion".	Edit considered but not accepted as it does not improve the requirement.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
466	11	Canopy has also previously recommended that the SFI clearly prohibit the use of GMO trees in certified forests. Notably, the PEFC has recently also adopted this position. However, the draft Standard still does not prohibit the use of genetically engineered trees and other GMOs in certified forests. Meanwhile, Indicators 5.1.2 and 11.1.2 expressly allow for GMO tree research, and merely require compliance with applicable laws. Much as before, both an SFI policy and Guidance for the Standard state that “use of genetically modified trees... is not approved for use in SFI labeled products.” However, neither document provides a mechanism to implement the policy, and section 7.2.2 of the draft 2022 Chain of Custody Standard appears to contradict the policy, by exempting SFI certified forests from due diligence requirements that call for measures to avoid sourcing genetically modified trees.	We recommend the Standard be revised to: <ul style="list-style-type: none"> <li>Align with the new PEFC standards. Prohibit the use of any GMO species in certified forests.</li> <li>Disallow research into GMO species by certified organizations.</li> </ul>	SFI Forest management Standard does align with PEFC requirement for GMO. Proposed edits addressed with PM 12.1.
467	11	Objective 11: Forestry Research, Science and Technology – Right now this is very weak. It is far too ad hoc in its design (there is none) and implementation and in addressing priority knowledge gaps. Research needs to be more of a collaborative effort and needs the US Forest Service and university research programs to focus on those important knowledge gaps. This is needed in order to build on an effectiveness monitoring program and to accomplish adaptive management. The effectiveness monitoring program is needed for many reasons, but		Comment addressed with PM 12.1 and 12.1.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
		additionally it is needed so that the best available science can be integrated into operations. Staff need encouragement and support to keep up on the science.		
468	11	"forestry" makes the objective limiting - same case as above. Second use of forestry in objective is appropriate	"...To invest in research, science and technology..."	Proposed edit addressed in Objective 12.
470	11	Lack of clarity	Clarify if the climate change piece has already been captured in objective 9 or is something else being referred to here	Addressed in Ind. 12.1.1.
471	11	Could be more clearly stated.	"To invest in forestry research, science and technology, which will promote improved data collection and decision making in sustainable forest management."	Edit considered but not accepted as it does not improve the requirement.
472	11	Should SFI revise the research requirement in 11.1.1 to include research of indigenous values in the list of examples.	Performance Measure 11.1.Certified Organizations shall individually and/or through cooperative efforts involving SFI Implementation Committees, associations or other partners provide in-kind support or funding for forest research to improve forest health, productivity and sustainable management of forest resources, and the environmental benefits and performance of forest	Addressed by Ind. 12.1.1.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
			products. Indicators: 1. Financial or in-kind support of research to address questions of relevance in the region of operations. Examples could include, but are not limited to, areas of forest productivity, water quality, biodiversity, landscape ecology, community issues, traditional ecological knowledge, Indigenous relationship building, non-timber forest products, support for Forest Inventory Analysis (FIA), SFI's Conservation Grant Program, or similar areas which build broader understanding of the benefits and impacts of forest management.	
469	11	"Community issues" is listed as one of several potential research areas in Indicator 11.1.1, although PM 11.1 is intended to address "improve forest health, productivity and sustainable management of forest resources, and the environmental benefits and performance of forest products". Community issues/social impacts is thus somewhat under-emphasized.	Delete "community issues" from Indicator 11.1.1 and consider adding a Performance Measure 11.3 addressing social impacts to place increased emphasis on the importance of social issues and the interconnectedness of healthy forests and healthy communities (which is an issue	Edit considered but not accepted as it does not improve the requirement.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
			of increasing importance to brands and stakeholders).	
473	11.1	<p>We respectfully request that SFI consider including AZE sites and Key Biodiversity Areas (KBAs) in the Definition of Controversial Sources in Section 7.1, Subheading B of the Standards and Rules. AZE was in the former standards (Section 10.2: Resources for the Conservation of Biological Diversity); however, it appears that section has been removed in the draft SFI 2022 Standards. Our suggestion follows, in bold:</p> <p>"Forest activities which are contributing to regional declines in habitat conservation and species protection (including biodiversity and special sites, such as AZE sites and KBAs, threatened and endangered species."</p> <p>Launched globally in 2005, the Alliance for Zero Extinction (AZE) was established to identify and effectively conserve the most important sites for preventing global species extinctions - those that hold the last remaining population of one or more IUCN Critically Endangered (CR) or Endangered (EN) species. AZE sites comprise a subset of KBAs, which are 'sites contributing significantly to the global persistence of</p>		Addressed with definition of non-controversial sources. See Section 14 - Definitions.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
		biodiversity', in terrestrial, freshwater and marine ecosystems. KBAs are globally recognized as sites of high biodiversity value.		
524	11.1.1		<p>amend Indicator 11.1.1 to read, "...key themes of relevance in the region of operations, <u>as identified by local stakeholders and communities, including Indigenous Peoples</u>. Examples could include...". The inclusion of "stakeholders" leaves room for the businesses, ENGOs and universities who are often core partners in research collaborations, while then also creating space for more community involvement.</p> <p>Alternatively, we could develop a new indicator or performance measure that speaks specifically to "funding or in-kind support for research initiatives that are directed by and support the decision-making of key stakeholder and community partners, including Indigenous Peoples."</p>	Edit addressed with Ind. 12.1.1.





Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
474	11.1.2	SFI's proposed standard does not explicitly prohibit the use of GMOs (genetically modified organisms) in its forests beyond 2022. This is concerning considering the large data gaps and risks around GMOs in forests.		Comment addressed with the SFI Forest Tree Biotechnology Policy. This policy aligns with the PEFC GMO Policy banning the use of GMOs. See SFI Section 8 - SFI Policies.
478	11.1.3	The action verb "Consider..." has no place in a performance indicator. Is this indicator intended to be optional? If so, what's the point?	Indicator should read "Share knowledge..." or be dropped.	Edit addressed with Ind. 12.1.2.
475	11.1.3	"Consider" is too wishy-washy	Change to "Share knowledge gained through research..."	Edit addressed with Ind. 12.1.2.
476	11.1.3	This indicator is purposeless with the word "Consider"		Edit addressed with Ind. 12.1.2.
477	11.1.3	Lack of clarify on what is meant by sharing	Provide examples to clarify what is meant by sharing (e.g. open science)	Comment addressed with PM 12.1.
479	11.2		development of information such as	Addressed with Ind. 12.2.1
480	11.2	We believe contributing to multi-party analyses is equally important as developing unique analyses or using them when completed, and that they are important at the national level as well as state and regional levels. This wording additions proposed here are in support of the addition of Indicator 11.2.2 above.	Performance Measure 11.2. Certified Organizations shall individually and/or through cooperative efforts involving SFI Implementation Committees, associations or other partners develop, contribute to, or use national, state, provincial or regional analyses in support of	Addressed with PM 12.2.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
			their sustainable forestry programs.	
481	11.2	Is there confusion between gross growth volume and net volume? Most certified organization/owners can only guess at this – holdings are too small to have robust FIA data to make these calculations – the values may only be valid at the state scale for most states.		No edit proposed.
482	11.2.1	Missing word?	Replace "development information" with "development of information".	Edit addressed with Ind. 12.2.1.
483	11.2.2	We propose a 2nd (new) indicator underneath the performance measure that requires support for sustainability analysis and research. We believe it should be required for any entity desiring SFI certification to cooperate with and contribute to national level sustainability tracking research programs, such as Forest Inventory and Analysis (FIA) in the United States and NFI (National Forest Inventory) in Canada. These multi-stakeholder efforts are the best way to track and tell the story of the importance of sustainable forest management.	Indicator 2. Participation, individually and/or through cooperative efforts involving SFI Implementation Committees and/or state and federal association and/or associations at the national, state, provincial, or regional level in federal forest inventory programs, including but not limited to efforts to: <ul style="list-style-type: none"> <li>a. collect forest inventory data from field plots</li> <li>b. survey mills regarding the use of roundwood, and</li> <li>c. collect data about private landowner demographics and intentions</li> </ul>	Edit considered but not accepted as it does not improve the requirement.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
484	12	The transition from Certified logger to Certified logging company is not very clear. All definitions are confusing. See below:		Addressed with new definition for Certified Logging Company. See SFI Section 14 - Definitions.
485	12	Objective 12: Training and Education – opportunities for post-secondary training and education are rare. There is no agency support for post-secondary education or refreshers in the science of forest management either in terms of hard science or soft science.		Noted. No edit proposed.
486	12.1	use of SFI 2015-2019 outdated	"...under the 2022 Forest Management Standard."	Noted.
487	12.1	"Forests with Exceptional Conservation Value" be removed from a Core Training requirement. This is a biologic technical consideration at the landscape scale that is the responsibility of qualified forest professionals with the appropriate forest ecology qualifications and not the responsibility of loggers on the ground.	Regarding the new Core Training requirement for Forests with Exceptional Conservation Value (FECV), the NY SIC does not believe this landscape value effort of SFI should be placed on loggers. We do not inherently have anything against FECVs but believe that this is the responsibility of foresters or land managers who have the necessary forest ecology training to both identify and manage these conservation landscape values. Loggers follow the direction of the foresters and land managers who know and can identify	Edit considered but not accepted as it does not improve the requirement.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
			FECVs (as well as other forest ecology and silviculture values) and loggers should not be responsible for them. While in NY we do have basic "Forest Ecology & Silviculture" training as part of our basic logger training, we do not get into the depth and breadth of FECVs.	
488	12.1.5	It is currently unclear what constitutes the difference between a QLP and "wood producers that have completed training programs and are recognized as qualified logging professionals". Please clarify the difference between a QLP and a wood producer recognized as a QLP.		Qualified logging professional and wood producer are both defined terms. See SFI Section 14 - Definitions.
489	12.1.5	suggest "SFI compliant" be added as qualifier	"...producers that have completed SFI compliant training programs..."	Edit considered but not accepted as it does not improve the requirement.  To be recognized as a QLP the wood producer needs to have completed SIC recognized training.



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490	12.1.5	Applaud the formal recognition of Certified Logging Companies. I believe certified Master Logger programs have enormous potential to advance and enhance implementation of SFI certification on the ground, particularly on non-certified lands (Fiber Sourcing). I would urge SFI to prioritize CLC's as the first preference. Doing so would provide a strong signal and incentivize increased participation in certified ML programs. Also, the definition of a CLC should not be described as a sub-set of a QLP. See related comment in the Definitions tab.	Revise Indicator language to read: "Certified Organizations shall have written agreements for the use of certified logging companies, or where not available, with qualified logging professionals and/or wood producers that have completed training programs and are recognized as qualified logging professionals."	Edit considered but not accepted as it does not improve the requirement.  To be a CLC, the entity must first have personnel that are QLP qualified.
491	12.2	This collection of indicators effectively applies performance requirements on SIC's rather than on Certified Organizations. This approach has always been extremely difficult to audit effectively. When/if an SIC fails to conform to one of these indicators, auditors are forced to raise NC's against individual members. Inevitably this becomes disconnected, confusing, and very inefficient.	Drop all specific requirements that apply only SIC's. Continue to require SIC support (via PM. 13.1). Add SIC indicators through a separate SIC auditing protocol.	Addressed with PM 13.2.
492	12.2	SFI could let the SIC decide which element need to be in the core training vs in the continuing education, base on what is important depending on the ecosystem, issues and needs?	Suggest: Participation in or support of SFI Implementation Committees to establish criteria and identify delivery mechanisms for wood producer core training courses that address topics such as: a. awareness of sustainable forestry (...)	Edit considered but not accepted as it does not improve the requirement.



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493	12.2.1	Having criteria for SFI recognized training at the SIC level introduces potential of inconsistency from state/province to state/province and may not fully capture the collective knowledge and experience of the SFI network. Consider establishing criteria at the level of the SFI Standard.	Delete "... establish criteria and ..." and then add to the end after "that address the following minimum criteria for SFI endorsed core training programs". Then make sure the list is comprehensive and can be used consistently throughout the SFI network to recognize core training programs. For example, consider adding back in the four topics moved to continuing education, and add "compliance with all applicable laws and regulations" or similar text.	Edit addressed with PM 13.2.
494	12.2.2	Concern that change in wording from "from CE component w/ coursework" to "CE training courses" will require development of actual course rather than CE through various methods (e.g. webinars, weekly meetings, tailgate meeting etc.)	Maintain wording reference to "coursework" to allow for flexibility of delivery.	Edit considered but not accepted as it does not improve the requirements.
496	12.2.2	Similar to comment above for 12.2.1. Also, considering the trainings take place once every 2 years, consider increasing the number of topics covered. Some of the topics bundled together in sub-indicator 12.2.1.a could be broken up into separate more homogenous groupings.	Delete "... establish criteria and ...". and ..." and then add to the end "that address the following minimum criteria for SFI endorsed continuing education training programs". Then make sure the list is comprehensive and can be used consistently throughout	Edit addressed with PM 13.2.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
			the SFI network to recognize continuing ed training programs. Also, consider replacing "one or more" with "two or more".	
495	12.2.2	Does the definition of “wood producer” include staff of a state agency?		The definition of wood producer is specific to a person or organization involved in the harvest and/or supply of wood. However, if it is a state agency that is doing the harvesting and supply of wood fiber then agency employees could be included in the definition.
497	12.3	Endorsement of Certified Logging Programs is different than Qualified Logging Programs (QLPs). QLP do not recognize an individuals on the ground performance. A certified logging program would carry the approval of a SIC. based only on the CLP’s harvesting site evaluations and have no core training or standard training requirements. This makes the SIC responsible by association for the quality of work a CLP is conducting. This is completely different than endorsing the content of a	Certified Logging Programs can be of great value to the logging profession. Examples of well-designed and administered programs from around the country certainly add to good results on the ground and to the safety of logging contractors. Even a cursory review of different programs, however, reveal drastically	Edit considered but not accepted as it does not improve the requirement. However, Certified Logging Program has been replaced by Certified Logging Company.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
		<p>training program. Our SIC is already heavily tasked with other important program projects. Credible verification of harvesting practices by a CLP will require time the SIC does not have and take valuable hours that could be spent working on landowner/ industry outreach, training programs, etc.</p> <p>The SIC would be endorsing the performance of the Certified Logging Program; the CLP standards, how effectively the CLP audits their standards, and how they address known deficiencies of their members. . The SIC would be continuously ensuring that the CLP is functioning in conformance with all the required aspects of the SFI Standard criteria (Performance measures 12.3a-i / 6.3a-i). How does the SIC deal with nonconformance complaints or on the ground shortcomings? The SIC would have no control over or ability to enforce corrective actions. This could place the SIC into a precarious situation not only authoritatively but also from a credibility perspective, as logging communities are relatively tight-knit and can be factional. The local politics around appeals/dispute resolution processes should the SIC determine the CLP is not performing to the expectations of the standard could be divisive in local areas .</p>	<p>different levels of rigor demanded of participants. One of the strengths of the SFI training programs administered by SIC's across the country is consistency among core training modules. We recommend that Certified Logging Programs stand on their own merit, independent of SFI, by having all references to Certified Logging Programs and their endorsement removed from the SFI Standards and Rules.</p>	





Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
498	12.3	<ul style="list-style-type: none"> <li>The proposed Standards and Rules place increased emphasis on Certified Logging Programs and encourages their endorsement by the SICs.</li> <li>Endorsement of Certified Logging Programs is drastically different than Qualified Logging Programs (QLPs) in that the actual performance of a company certified to the program would carry the approval of an SIC. This is different than endorsing the content of a QLP training program. QLP recognition stops short of an individual's on the ground performance. Certified Logging Program endorsement would carry a SIC endorsement that next step. The SIC would essentially be vouching for the performance of each individual CLC based on their endorsement of the Certified Logging Program itself.</li> <li>Some Certified Logging Programs operate independently of SFI and the SICs. They are their own certification organizations. So in addition to endorsing the performance of Certified Logging Companies (CLCs), the SIC would also be endorsing the performance of the Certified Logging Program; their standards, how effectively they evaluate those standards, and how effectively they address known deficiencies of their members – none of which the SIC would have any control over. This places the SIC, with its limited resources, in the position of a policing force of the independent Certified Logging Program, to ensure that they are continuously</li> </ul>	We recommend that Certified Logging Programs stand on their own merit, independent of SFI, by having all references to Certified Logging Programs and their endorsement removed from the SFI Standards and Rules.	Edit considered but not accepted as it does not improve the requirement. However, Certified Logging Program has been replaced by Certified Logging Company.



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		<p>(not just when they initially apply for recognition) functioning in conformance with all the required aspects of the SFI Standard criteria (Performance measures 12.3a-i / 6.3a-i). Would the Certified Logging Program even be open and transparent with the SIC to allow this level of necessary ongoing oversight?</p> <ul style="list-style-type: none"> <li>• We agree that CLC's should be required to meet QLP requirements (Section 2, Performance Measures 12.1.a, 12.1.i.i; Section 3, 6.3.1.a, 6.3.1.i.i; Section 7, Objective 12, Certified Logging Companies), in order that current training information can be provided to them. However, with that requirement in place, why do Certified Logging Programs even need to be recognized by the SICs? The CLC would be in conformance with the SFI standards through the QLP requirements.</li> <li>• There is clearly no benefit to SFI or SICs in recognizing independent Certified Logging Programs. As previously explained, the SIC must invest resources into ensuring the Certified Logging Program is and remains in conformance with the SFI Standard. Independent Certified Logging Programs have nothing invested in that process and reap all the benefit in the form of marketability. In fact, with nothing requiring the Certified Logging Program to even promote SFI in any way, there is zero return on the SIC's investment. The SIC bears the full burden. Furthermore, with CLCs being required to meet QLP standards, the CLCs do not really add to the</li> </ul>		



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		<p>pool of loggers that meet SFI Standards and Rules, which means that there is not even a benefit to the Certified Organizations.</p> <ul style="list-style-type: none"> <li>• The SIC's only influence over the Certified Logging Program is the binary decision to "recognize" or "not recognize." This limited authority is drastically eroded away by the proposed appeals process included in the revised standards (Section 7, Objective 12, Certified Logging Companies). This should NOT be the case since the Standard states that it is the SIC (operating as an autonomously funded organization) that is endorsing (i.e. putting their reputation on) the Certified Logging Program and its certified members. An unsuccessful application to a SIC or a discontinuance of recognition initiated by the SIC overturned by the External Review Panel could unnecessarily provoke a great deal of anger, resentment, and malice between all three parties.</li> <li>• Loggers, foresters, landowners, Certified Organizations, and potentially even auditors do not always understand the difference between QLP and CLC programs in a given state. This causes a great deal of confusion and can lead to any of these entities thinking that a logger or logging company is in full conformance with the SFI Standards and Rules, when really, they are not.</li> <li>• There are concerns within the NE Region that the NE Master Logger Program lacks transparency, as their standards are not made</li> </ul>		



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		<p>publicly available (available only by request - <a href="http://masterloggercertification.com/9-standards/">http://masterloggercertification.com/9-standards/</a>). Furthermore, the NE Master Logger Program promotes itself based on a lack of training requirements, which flies in the face of long-established SIC endorsed QLPs and all the decades of efforts they have put into promoting the benefits of logger training. Again, the NE Master Logger Program has no requirement to promote the SFI program, and in fact, their website heavily promotes their involvement in FSC. There does not even appear to be a suggestion from the NE Master Logger Program that their certified members should participate in SFI training programs.</p> <ul style="list-style-type: none"> <li>• NE Master Logger Certification appears to have taken an antagonistic position towards SFI training. This has been independently documented by a 2018 study commissioned by WSRI (<a href="https://digitalcommons.library.umaine.edu/cgi/viewcontent.cgi?article=1233&amp;context=maine_environments_organizations">https://digitalcommons.library.umaine.edu/cgi/viewcontent.cgi?article=1233&amp;context=maine_environments_organizations</a>, accessed 05/11/20). The NE Master Logger Program is the only one mentioned in Section 6 of the report as having conflict with their origin state's SIC endorsed QLP program. This makes it even more concerning that a SIC's independent decision not to recognize a Certified Logging Program, such as the NE Master Logger certification, could be overturned by the decision of SFI Inc's External Review Panel via the proposed appeals process,</li> </ul>		



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		<p>and that such a program would be given every opportunity to contort themselves in a way that eventually satisfied all the necessary criteria for SIC recognition via the same portion of proposed guidance language in the SFI Standards.</p> <ul style="list-style-type: none"> <li>• In general, we do not believe there is anything inherently wrong with Certified Logging Programs. We recognize that there is value in holding individual logging company performance to higher standards. Our issue is with SFI/SIC recognition of them and their certified members, for all the reasons previously stated.</li> </ul>		
499	12.3	<ul style="list-style-type: none"> <li>• The proposed Standards and Rules place increased emphasis on Certified Logging Programs and encourages their endorsement by the SICs.</li> <li>• Endorsement of Certified Logging Programs is drastically different than Qualified Logging Programs (QLPs) in that the actual performance of a company certified to the program would carry the approval of an SIC. This is different than endorsing the content of a QLP training program. QLP recognition stops short of an individual's on the ground performance. Certified Logging Program endorsement would carry a SIC endorsement that next step. The SIC would essentially be vouching for the performance of each individual CLC based on their endorsement of the Certified Logging Program itself.</li> </ul>	We recommend that Certified Logging Programs stand on their own merit, independent of SFI, by having all references to Certified Logging Programs and their endorsement removed from the SFI Standards and Rules.	Edit considered but not accepted as it does not improve the requirement. However, Certified Logging Program has been replaced by Certified Logging Company.



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		<ul style="list-style-type: none"> <li>Some Certified Logging Programs operate independently of SFI and the SICs. They are their own certification organizations. So in addition to endorsing the performance of Certified Logging Companies (CLCs), the SIC would also be endorsing the performance of the Certified Logging Program; their standards, how effectively they evaluate those standards, and how effectively they address known deficiencies of their members – none of which the SIC would have any control over. This places the SIC, with its limited resources, in the position of a policing force of the independent Certified Logging Program, to ensure that they are continuously (not just when they initially apply for recognition) functioning in conformance with all the required aspects of the SFI Standard criteria (Performance measures 12.3a-i / 6.3a-i). Would the Certified Logging Program even be open and transparent with the SIC to allow this level of necessary ongoing oversight?</li> <li>We agree that CLC's should be required to meet QLP requirements (Section 2, Performance Measures 12.1.a, 12.1.i.i; Section 3, 6.3.1.a, 6.3.1.i.i; Section 7, Objective 12, Certified Logging Companies), in order that current training information can be provided to them. However, with that requirement in place, why do Certified Logging Programs even need to be recognized by the SICs? The CLC would be in conformance with the SFI standards through the QLP requirements.</li> </ul>		



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		<p>provoke a great deal of anger, resentment, and malice between all three parties.</p> <ul style="list-style-type: none"> <li>• Loggers, foresters, landowners, Certified Organizations, and potentially even auditors do not always understand the difference between QLP and CLC programs in a given state. This causes a great deal of confusion and can lead to any of these entities thinking that a logger or logging company is in full conformance with the SFI Standards and Rules, when really, they are not.</li> <li>• There are concerns within the NE Region that the NE Master Logger Program lacks transparency, as their standards are not made publicly available (available only by request - <a href="http://masterloggercertification.com/9-standards/">http://masterloggercertification.com/9-standards/</a>). Furthermore, the NE Master Logger Program promotes itself based on a lack of training requirements, which flies in the face of long-established SIC endorsed QLPs and all the decades of efforts they have put into promoting the benefits of logger training. Again, the NE Master Logger Program has no requirement to promote the SFI program, and in fact, their website heavily promotes their involvement in FSC. There does not even appear to be a suggestion from the NE Master Logger Program that their certified members should participate in SFI training programs.</li> <li>• NE Master Logger Certification appears to have taken an antagonistic position towards SFI training. This has been independently</li> </ul>		





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		<p>documented by a 2018 study commissioned by WSRI (<a href="https://digitalcommons.library.umaine.edu/cgi/viewcontent.cgi?article=1233&amp;context=maine_env_organizations">https://digitalcommons.library.umaine.edu/cgi/viewcontent.cgi?article=1233&amp;context=maine_env_organizations</a>, accessed 05/11/20). The NE Master Logger Program is the only one mentioned in Section 6 of the report as having conflict with their origin state's SIC endorsed QLP program. This makes it even more concerning that a SIC's independent decision not to recognize a Certified Logging Program, such as the NE Master Logger certification, could be overturned by the decision of SFI Inc's External Review Panel via the proposed appeals process, and that such a program would be given every opportunity to contort themselves in a way that eventually satisfied all the necessary criteria for SIC recognition via the same portion of proposed guidance language in the SFI Standards.</p> <ul style="list-style-type: none"> <li>• In general, we do not believe there is anything inherently wrong with Certified Logging Programs. We recognize that there is value in holding individual logging company performance to higher standards. Our issue is with SFI/SIC recognition of them and their certified members, for all the reasons previously stated.</li> </ul>		



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500	12.3	Applaud the recognition of Certified Logger Companies. This is a smart move for SFI. However, efforts to "foster improvement in the professionalism of wood producers specific to certified logging companies" should not be limited only to those regions where they currently exist. CO's and SIC's should be encouraged to promote and encourage the development of CLC's even where they don't currently exist, but could.	Delete "... where they exist."	Addressed with Ind. 13.1.5.
501	12.3	The Certified Logging company's (CLC) recognition by SFI Implementation Committees is problematic. It represents a significant investment of time and resources by the SIC and sets up a potentially polarizing dynamic should the SIC not recognize the CLC program. Additionally, it's likely in our region NE Master Logger would be the program that would make the application. Their standards are not published and if you look at their website you will see that they are very pro FSC and post articles condemning logger training, a key requirement of SFI. In addition, the NE Master logger program promotes itself as providing quality logging and management services particularly for family forest. <a href="https://youtu.be/4uRHnSO1a9w">https://youtu.be/4uRHnSO1a9w</a> If an SIC recognizes NE Master logger, SFI is in essence putting its stamp of approval that Master loggers do provide quality logging and management services. The SICs have no way of knowing or keeping track of the logging firm's		Comment considered but not accepted as it does not improve the requirement.



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		<p>performance. This differ significantly from recognizing a QLP training program. In recognizing a training program we are only saying the content of the training is consistent with SFIs requirements and that loggers have taken the training. There is no suggestion by the SIC and by extension SFI, that recognition of a training program guarantees any quality level of services.</p> <p>When SFI recognized Tree Farm there was a lengthy process to go through to make sure TF measured up to SFI with accommodations for scale. If Master Logger is to be recognized, SFI Inc should review their standards at a national level. If that is not possible, I would suggest the whole provision be taken out of the standard. No one benefits other than the MLC program being able to say we are good loggers and that SFI and it's good name, agrees.</p>		
502	12.3	SICs have limited resources and will potentially need to use them to police the certification programs over which they have no direct oversight.	I recommend that Certified Logging Programs stand on their own merit, independent of SFI, by having all references to Certified Logging Programs and their endorsement removed from the SFI Standards and Rules.	Edit considered but not accepted as it does not improve the requirement. Certified Logging Program has been replaced by Certified Logging Company.



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503	12.3	The Pennsylvania Hardwoods Development Council is made of government and forest products industry professionals appointed by the Governor to promote the forest products industry in the Commonwealth. Their objective is timber access and sustainable forestry, economic development, international and domestic marketing, and public education about forestry and the forest products industry. The Council has taken a neutral stand on forest certification, but actively promote both FSC and SFI certification land and chain-of-custody companies. Our state forest lands (2.2 million acres) are dually certified by FSC and SFI. We are opposed to SFI recognizing Certified Logging Programs because: 1) Master Loggers are not necessarily more professional or safer than those trained by SFI, yet the public may infer that they are. While voluntary performance-based verification is a laudable, in the absence of robust training it is incomplete. 2) In states where there is a certified logging program, it becomes difficult for the SFI Implementation Committee (SIC) to endorse and/or evaluate a completely independent non-binding standard and those certified by it. SICs should not be put in the position of attaching their reputation to an independent certification system and those whom they certify. The confusion from competing programs is not helpful to the public who wants assurance that their logger is professionally trained for safety and	We recommend that certified logging programs be completely removed from the SFI Standard.	Addressed by Ind. 13.1.5 and definition of Certified Logging Company - see SFI Section 14 - Definitions.



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		sustainability. 3) We publish annually a list of the trained loggers in the Commonwealth. It does not seem fair to include Certified Logging Companies in this directory when the requirements are not necessarily equivalent. 4) Based on experience and confusion in other states, Pennsylvania prefers to only promote the SFI Qualified Logging Program.		
504	12.3	<p>The Northern Tier Hardwood Association is a non-profit organization serving the forest product industry and its supporters throughout nine counties in northeastern Pennsylvania. The Association's mission is to promote long term economic development in the Northern Tier of Pennsylvania through intelligent forest management, careful expansion of secondary wood processing, improved manufacturing methods, regional hardwood promotion and education.</p> <p>The NTHA works with, promotes, and is a member of the Pennsylvania SFI State Implementation Committee that offers a strong Qualified Logging Program for over 800 voluntary participants.</p> <p>While we support Certified Logging Programs in general, we are concerned about the proposed Standards and Rules placing an increased emphasis on Certified Logging Programs and encouraging their endorsement by the SICs. Endorsement of a Certified Logging Program (CLP) at the state level would essentially mean</p>	Due (but not limited to) the conflicts described above, endorsement of Certified Logger Programs should be done at the SFI level if at all to release the burden and liability of endorsement on the SICs.	Addressed by Ind. 13.1.5 and definition of Certified Logging Company - see SFI Section 14 - Definitions.



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		that the SIC is vouching for the performance of each individual certified logging company that the CLP endorses. In addition, the SIC would also be endorsing the performance of the Certified Logging Program – their standards, how effectively they evaluate those standards, and how effectively they address known or unknown deficiencies of their members, without having any influence or control over them. This makes SICs, with limited resources, responsible for ensuring that the Certified Logging Program and its participants are continuously in conformance with all of the required aspects of the SFI Standard criteria. The Certified Logging Program would have to be open and transparent with the SIC to ensure those standards are met by its program and participants at all times.		
505	12.3.1	Similar to comments above relating to PM 12.2. Suggest that criteria for SFI recognition of CLCs and associated MLP's be established at the standard level.	Replace "establish criteria" with "promote and recognize" and then add to the end "that address the following minimum criteria for SFI endorsed continuing education training programs". Then make sure the list is comprehensive and can be used consistently throughout the SFI network to recognize continuing ed training programs. Also, delete "... where they exist."	Edit addressed with Ind. 13.1.5 and definition of Certified Logging Company. See SFI Section 14 - Definitions.



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506	12.3.1 b. & i.	Independent in the forest verification is not necessary in states like CA where licensing of loggers exists as well as extensive oversight by foresters representing the landowner and foresters representing government agencies. The edits we suggest will allow the CA SIC to develop a framework for the creation of a financially feasible process for wood producers in the state to become certified logging companies.	Delete the phrase "independent in-the-forest"	Comment addressed with definition of Certified Logging Company. See SFI Section 14 - Definitions.
507	12.3.1 i	Consider moving 12.3 1 (i) content into it's own objective number (i.e., 12.3 2.) as I believe you intend this requirement to apply to all Certified Organizations, not just to Recognition of Certified Logging Programs, where they exist. Locating it within objective 1, seems to imply it only applies to logging certification programs criteria.	Move 12.3, 1. (i) to a new objective 12.3.2	Comment addressed with definition of Certified Logging Company. See SFI Section 14 - Definitions.
508	12.3.1 i.	The meaning of "independent" is not clear to me. Who qualifies as independent in this context?		Comment addressed with definition of Certified Logging Company. See SFI Section 14 - Definitions.
509	12.3.1 i.	The meaning of "crew" is not clear to me. All people working on a common landing? Road system? For a single contractor?		Comment addressed with definition of crew. See SFI Section 14 - Definitions.



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510	13	Objective 13: Community Involvement and Landowner Outreach – seems to be a rather large requirement here that needs to be integrated with the federal cooperative programs – Forest Legacy, Forest Stewardship, Forest Health, Urban and Community Forestry and Community Wildfire Protection Program.		Comment addressed with PM 14.1.
511	13.1.3	"cost share programs" limits the scope of programs. Replace with "partnership opportunities" or "partnership programs" this will include other in-kind participation	Replace "cost share programs" with "partnership opportunities" or "partnership programs"	Edit addressed with Ind. 14.1.3.
512	13.2.1.f	this can be expanded to capture other credible efforts	"...such as Project Learning Tree, SIC sponsored teacher education tours and programs, and various educational programs supported by national and state forestry associations, agencies and groups."	Edit addressed with Ind. 14.2.1 f.
513	13.3	Suggest to add stakeholders to the list. As per SFI definition, a stakeholder is: A person, group, community or organisation with an interest in the subject of the standard.	Suggest: "Certified Organizations shall establish, at the state, provincial, or other appropriate levels, procedures to address concerns raised by stakeholders, loggers, consulting foresters, employees, unions, the public or other Certified Organizations regarding management that appears inconsistent with the	Addressed with PM 14.3.





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			SFI Standard principles and objectives."	
514	14	Clarify up front that this applies to Certified Organizations with forest management responsibilities on public lands (per PMs).	"For entities with forest management responsibilities on public lands to participate in the public land planning process and implement sustainable forest management on public lands."	Addressed in Objective 15 - Public Land Management Responsibilities
515	14	Or broaden / clarify.	"To participate in the public land planning process and support the implementation of sustainable forest management on public lands."	Comment considered but not accepted as it does not improve the requirement.
516	14.1.2	not sure why this is limited to local stakeholders. Seems it should be about forest users, no matter if they are local or not.	replace local stakeholders by forest users or another label that is not geographically bounded but in relation to the use of the land being certified	Comment considered but not accepted as it does not improve the requirement.
517	15	Our annual reporting provides transparency. There are no PMs driving further 'increase' in transparency.	"To annually report progress on conformance with the SFI Forest Management Standard."	Addressed with Ind. 17.1.2.
518	15.1	Performance Measure 15.1 – the annual SFI report, audit report and management review are inadequate to address public reporting in a meaningful way.		Comment addressed with PM 16.1 and SFI Section 11 - Communications and Public Reporting.



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519	15.1.1 g	Improve clarity	"a summary of the findings, including general descriptions of evidence of conformity, any nonconformities and corrective action plans to address them, opportunities for improvement, and exceptional management practices"	Edit addressed with Ind. 16.1.1 g.
520	16	Objective 16: Management Review and Continual Improvement – must be more than just compliance – it needs a focus on outcomes. – to promote continual improvement in the practice of sustainable forestry requires assessment of outcomes. Assessment of outcomes requires effectiveness monitoring and validation monitoring (research). Both are very expensive. Monitoring of compliance with the management standards is not adequate to address the achievement of sustainable forest management.		Addressed with Ind. 17.1.2.
521	16	Improve clarity.	"To promote continual improvement in the practice of sustainable forestry by monitoring performance and conducting management reviews."	Comment considered but not accepted as it does not improve the requirement.
522	16.1.2	The new addition of "including measures to reduce negative impacts from forest management operations" is already covered in 16.1.3, and focuses completely on the negative.	Drop the added language.	Comment considered but not accepted as it does not improve the requirement.



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523	16.1.2	new language makes assumption forest management operations will have negative impacts. Optics as written are not supportive of SFM	delete new language and keep indicator as currently written	Comment considered but not accepted as it does not improve the requirement.
525	General	<p>There is confusion over what conformance to the standard is: conformance to the SFI certification standard does not equal forest sustainability. In this sense the standard creates confusion about whether or not a certified agency or owner of forest land is managing the forest sustainably. The certification standard speaks to the management system (and some related actions) and whether or not it meets a high standard – a standard that is high enough that it could produce a sustainably managed forest, other things being considered. Certification was never intended to assess progress towards of maintenance of sustainable forest conditions. The standard promotes sustainable forest management but does not achieve it by itself. The Montreal Process was designed for that purpose and it was not even mentioned in the standard.</p>		<p>SFI has since its first Standard endorsed and worked with the Montréal Process criteria and indicators, participating countries have made a national commitment to work towards the sustainable management of their forests. Montréal Process criteria and indicators are intended to track progress at a national level and provide an international reference for policymakers. Many can be reinforced and supported at a local level and are, reflected in the SFI 2022 Forest Management and Fiber Sourcing Standards. However, in the revision to SFI Section 1 - Introduction the reference to the</p>



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				Montréal Process has been removed. Nonetheless, SFI Standards continue to align with the Montreal Process.
526	General	I think that there is some confusion in the use of the terms 'forest' and 'timber.' They appear to be used interchangeably and they should not be used that way.		In the Forest Management Standard, the word 'timber' is used just in the context of 'non-timber forest products' or 'non-timber issues'. In this usage 'timber' is used in an economic context.
1	General	I noticed the use of the term “utilize” and many of its derivatives. I would strongly recommend that you remove these from the document and use the word “use” and its derivatives. “Utilize” is a pompous buzzword and we, as professionals, should not be using it. It is horrible and adds nothing to the report (or any report for that matter).		Noted.
2	General	An overarching issue with the efficacy of SFI standards and indicators is that the bottom-line in both is often just to have a program, to promote a principle, to address a problem, but not to be required to demonstrate measurable on the ground improvement in any such issue. Actual performance seems optional. This approach can read on the surface as		Program: An organized system, process or set of activities to achieve an objective or performance measure.  SFI uses an outcomes-based approach as well



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		improvement, but without a bottom-line demonstrated outcome, it is deceiving. This weakness still pervades SFI standards on forest management, stakeholder/public input, rights of Indigenous peoples and more.		as a prescriptive approach to achieve sustainable forest management. Many SFI indicators such as reforestation, harvesting, protection of biodiversity and chemical use take a prescriptive based approach. Others, by necessity, are based on an outcomes approach which require specific on the ground results but allow for flexibility to manage local conditions. An outcomes approach ensures there is a process in place to achieve the specified objectives, and this approach is verified by an independent third-party assessor with on the ground audits. This approach allows for management by qualified resource forest professionals (foresters, biologists, ecologists, hydrologists, etc.) who are most knowledgeable



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				about the sustainable forest management objectives for the forest lands being certified. It is important to note that the “approach” is not critical— rather, achieving the desired outcome is the key.
3	General Comment	Including CLC's in the FM standard can provide more strength to the 3rd party auditing that takes place by the FM. Not every logging contractor can be visited during an audit. Providing an extra verification through the use of CLC's and their in-forest verification is a great idea.		Comment addressed with Ind. 3.1.5 definition of certified logging company
13	Principle 1	Under 1 (Sustainable Forestry) consider updating the first sentence (needs of the present while promoting the ability of future generations) by replacing the term "promoting" with a more substantial word such as "protecting"	...to meet the needs of the present while <i>protecting</i> the ability of future generations...	Edit addressed with 1.4.1 (Principle 1).
5	Principle 1.4	Suggest wording should be changed to encompass quantity, quality, and ecological integrity of water resources - to include other ecological functions in water. This would imply some overlap with the aquatic species part of "biological diversity", but that is a good thing. Make this change throughout the document and refer to water resources when referencing in general.	"... quantity, quality, and ecological integrity of water resources"	Edit addressed with 'Principles 1.4 - Protection of Water Resources' and Objective 3.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
6	Principle 1.4	The SFI Forest Management Standard applies to more than private forest landowners. Public lands are SFI certified. We suggest removing the two references to "private"	"...They support efforts to safeguard property rights and to help all landowners....."	Edit addressed with 1.4 Forest Management Principles.
7	Principle 1.4	SFI forest management standards also safeguard public interests and many thousands of acres of public forests are certified.	They support efforts to safeguard public interests and private property rights, and to help all public and private landowners manage their forestland sustainably.	Comment address with text in 1.4 Principles which points to forestlands owned or managed (i.e., public) forests.
9	Principle 1.4.4	We have great concern about referencing "native cover types" at this junction of the standard. Yes, "native cover types" has been in the previous Standard, but this elevation will have unintended consequences	"...wildlife habitats, and ecologically important species or natural community types."	Edit addressed with 1.4.4 (Principle 4).
10	Principle 1.4.6	the added "important" serves no tangible purpose	"...ecologically, geologically or culturally important..."	Edit addressed with 1.4.6 (Principle 6).
11	Principle 1.4.9	"forestry" makes the principle limiting - what about wildlife or water quality or any other relevant research?	"...through research, science and technology."	Edit addressed with 1.4.9 (Principle 9).
14	Principle 2	Principles should relate first to the why, then to the how. Also, to me, in common usage, the word 'protect' means trying to freeze something. (I also comment on the definition in the standard.) Forests are very dynamic systems, and intelligent sustainable forest management recognizes and works with that dynamism. When the usage is 'protect from' that is more clear and acceptable.	"To maintain and promote long-term forest and soil productivity, by (i) maintaining the productive capacity of the forest land base , (ii) providing for the prompt regeneration of harvest areas, and (iii) protecting forests from economically or environmentally undesirable	Edit addressed with 1.4.2 (Principle 2).



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
			levels of wildfire, pests, diseases, invasive species, and other damaging agents."	
15	Principle 3	Principles should relate first to the why, then to the how. (I guess I'm OK with 'protecting' water bodies, too!)	"To maintain and promote water quality to meet the needs of both human communities and ecological systems, through the protection of water bodies and riparian areas and the implementation of appropriate forestry best management practices to protect water quality."	Edit addressed with 1.4.3 (Principle 3).
16	Principle 4	I dislike the use of 'protect' again.	Replace 'protect and promote' with 'maintain and promote'.	Edit addressed with 1.4.4 (Principle 4).
17	Principle 6	Ecologically important' has been moved from Objective 6 to Objective 4. It no longer seems to belong in Principal 6. 'Special sites' is then the appropriate defined term.	"To manage special sites in a manner that takes into account their unique qualities."	Edit addressed with 1.4.6 (Principle 6).
18	Principle 6	Adding "important" after ecologically but not geologically seems grammatically incorrect and seems to indicate that only ecological and cultural "special sites" are important. How is a geologically important site different from an ecologically important site? Isn't geology part of ecology?	Do not add "important"; it is clear enough as-is.	Edit addressed with 1.4.6 (Principle 6).





Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
19	Principle 7	'Both' is confusing given list in second item. Delete it.	"To use and promote among other forest landowners sustainable forestry that is scientifically credible and economically, environmentally and socially responsible."	Edit addressed with 1.4.13 (Principle 13).
20	Principle 7	<p>Is the threshold for scientific standards "believability"? I Suggest changing the word "credible" (capable of being believed), to a phrase that expresses the rigor that the scientific method requires. The scientific method is based on being, testable, observable, and repeatable; not "believable". Leave "credible" to fishing and news stories, people "believe" plenty of things that would not withstand scientific scrutiny. In my opinion SFI would benefit from clearly aspiring to a higher standard.</p> <p>I Suggest deleting "both" since there are 4 criteria listed and the word "and" makes the concept inclusive to those criteria.</p> <p>I Suggest changing "scientifically credible" to "founded on scientific principles", i.e. those expressed as respect for the integrity of knowledge, collegiality, honesty, objectivity, and openness.</p> <p>Scientific information is not economically, environmentally, or socially "responsible", it is objective. How scientific information is "applied" can subjective. For example scientific information (DNA sequences found in the genomes of organisms) could be used in</p>	<p>7. Responsible Fiber Sourcing Practices in North America</p> <p>To use and promote among other forest landowners sustainable forestry practices that are both scientifically credible founded on scientific principles and are applied in an economically, environmentally and socially responsible manner.</p>	Edit addressed with 1.4.13 (Principle 13).



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
		irresponsible or unethical ways (human cloning), but the scientifically derived information that allows for cloning is not "responsible" its objective. I suggest that the word "applied" be inserted to indicate that the scientific facts will be applied in a <i>"responsible manner"</i> .		



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
14	1	it needs to be about natural fauna and flora ... it would work best for the document to provide a definition of biodiversity up front that includes the idea of natural composition, structure and function	Suggest revising to use the term biological integrity or define biodiversity up front to include composition of the natural forest	Comment addressed with definition of biological diversity. See SFI Section 14 - Definitions.
15	1.1	Forests with exceptional conservation value are defined using the naturereserve ranks, critically imperilled or imperiled. Using the naturereserve ranks ignore regional rankings, some species are listed at threatened or endangered in Canada, but vulnerable by naturereserve.		In the circumstance pointed in the comment the legal requirement would take precedence. See Fiber Sourcing Standard, Performance Measure 4.1.
4	1.1	Scope- Here, it seems not clear where "Appendix 1" actually is stated. If it is outside, where is it now?		Comment addressed with new SFI 2022 Certified Sourcing Standard - SFI Section 6.
5	1.1	Scope- "Appendix 1 applies to any primary producer or secondary producer who uses the SFI Certified Sourcing on-product label or claim."	Remove reference to Appendix 1 that no longer applies with the addition of a CS standard	Edit addressed with revised 1.1. Scope.
6	1.1	Scope- SFI has an opportunity to elevate the implementation of best practices and of SFI standards, and at the same time create substantial efficiencies for Fiber Sourcing Certified Organizations by formally recognizing independently certified Master Logger Programs and participating CLCs. SFI could establish minimum criteria for formal recognition of MLPs ensuring that all applicable	Add language in the scope section recognizing all fiber delivered by CLC's in good standing with SFI-endorsed MLPs as being conformant with applicable SFI Fiber Sourcing standards.  Alternatively, create a module	Comment addressed with PM 3.1. and PM 3.2.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
		Objectives, Performance Measures and Indicators in the FS standard are addressed. In so doing, all fiber sourced through CLCs would be considered conformant to the SFI Fiber Sourcing standard, thereby reliving CO's from having to include fiber from those CLCLs in their FS program. The availability of that benefit to COs would in turn incentivize increased participation in recognized MLPs, thereby elevating the level of professionalism and implementation of SFI standards on lands covered by the FS standard.	for formal SFI recognition of independently certified MLPs and participating CLCs as an alternative option for COs to demonstrate conformance to FS standards (and a subset of FM standards). See comments in the Optional Modules tab.	
7	1.1	Scope- I have experienced organizations who procure and consume certified wood products but do not care to include products from the fibre sourcing standard as part of their certified percentage. They seem to only want to count the products certified to forest management standard. I think this is because the fibre sourcing standard is not regarded as a serious procurment standard. I belive the Fibre Sourcing standard is a superior standard but it is not given the credit it deserves because it is seen as the "must do" of the Forest management standard. To change this, it is time to promote it as a stand alone standard, to show that it can support its self by removing this "must also requirement" and allow organizations who value it the most to help evolve it on its own from this point forward.	Certified Organizations that source primary sources from forests certified to the SFI Forest Management Standard, American Tree Farm Standard or CSA Z809 Standard are encouraged to certify to the SFI Fiber Sourcing Standard.	Edit considered but not accepted as it does not improve the requirement.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
8	1.1	Scope- "What Fiber Sourcing Std Covers" needs re-writing. Reference to "...pulp and veneer..." makes not sense. Reference to Appendix 1 should be obsolete.	"...applies to any organization with a fiber sourcing program that acquires roundwood and field manufactured or primary-mill residual chips to support a forest products facility"	Edit addressed with revised 'What the Fiber Sourcing Standard Covers'.
16	1.1.1.a.	add "concepts" to clarify that promotion should be about biological diversity rather than "utilization of information".	a. promotion of biological diversity concepts utilizing information from organizations such as World Resources Institute, The Nature Conservancy, NatureServe, International, State Wildlife Action Plans, State Forest Action Plans and assessments;	Edit addressed with Indicator 1.1.1 a.
17	1.2	For Fiber Sourcing is the requirement to have a "program for FECVs" applicable for wood harvested by suppliers? Meaning beyond stumpage?		Comment addressed with Indicator 1.2.3 and SFI Section 7 Guidance - Biodiversity in Fiber Sourcing.
18	1.2	Referencing question about "program for FECVs" applicable for wood harvested by suppliers? Meaning beyond stumpage?"		Comment addressed with Indicator 1.2.3 and SFI Section 7 Guidance - Biodiversity in Fiber Sourcing.
19	1.2	Would the assessment made available to wood producers in 1.2.1 be sufficient?		Comment addressed with Indicator 1.2.3 and SFI Section 7 Guidance - Biodiversity in Fiber Sourcing.



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22	1.2	Support this addition and will significantly strengthen the Fiber Sourcing standard and Certified Sourcing claim in the marketplace and with brands/sceptics of SFI.	NA	Noted.
23	1.2	In the Fiber Sourcing Standard, we recognize the new performance measure (1.2) concerning Forests with Exceptional Conservation Value (FECV). However, while it is a step in the right direction, its requirements for certified organizations to conduct an assessment of FECV's and to develop a program to address are insufficiently prescriptive to ensure significant positive outcomes.		Comment addressed with Indicators 1.2.1 & 1.2.3 and SFI Section 7 Guidance - Biodiversity in Fiber Sourcing.
20	1.2	Can SFI plan to provide more guidance on the scope and scale of FECV analyses for wood supply required in the FS standard under 1.2.1? The current language is quite broad. Also, some CO's may have issues with multiple landscape types in their wood supply areas.		Comment addressed with Indicators 1.2.1 & 1.2.3 and SFI Section 7 Guidance - Biodiversity in Fiber Sourcing.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
21	1.2	<p>Objective 1. Biodiversity in Fiber Sourcing, Performance Measure 1.2: Promotion and Conservation of Forests with Exceptional Conservation Value, (FECV) Indicators 1 &amp; 3:</p> <p>Pyramid has concerns over these indicators based on the large area we source from. Pyramid sources logs from over 19,000 square miles in western Montana and Idaho. That is the size of Vermont and New Hampshire combined. In Indicator 3 it states: "Certified Organizations shall conduct and incorporate the results of a FECV assessment at a stand level for purchased logs."</p> <p>Pyramid is very concerned about doing "Stand" level assessment on purchased logs over 19,000 square miles. From western Montana with over 60" of precipitation to east of the Continental divide that only received 12" or less per year. Consequently, there are 7 Ecoregions in Montana representing a wide variety of forested stands, vegetative communities, and an abundance of fisheries/wildlife diversity. Any assessment would need to be at a much broader scale than at a stand level.</p>		Comment addressed with Indicators 1.2.1 & 1.2.3 and SFI Section 7 Guidance - Biodiversity in Fiber Sourcing.
26	1.2.1	Support this addition and will significantly strengthen the Fiber Sourcing standard and Certified Sourcing claim in the marketplace and with brands/sceptics of SFI.	NA	Noted.



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27	1.2.1	“within their wood and fiber supply area” may restrict the option for a collaborative assessment. Summary to wood producers phrase is not needed due to 1.2.2 indicator. We need guidance on what information is needed for an “assessment” and what must be included in the “summary” for this requirement to be implemented.	1. Certified Organization shall conduct an assessment, individually or collaboratively, of Forests with Exceptional Conservation Value that includes their wood and fiber supply area(s).	Edit addressed with Indicators 1.2.1 & 1.2.3 and SFI Section 7 Guidance - Biodiversity in Fiber Sourcing.
28	1.2.1	New indicator - what is the expectation regarding frequency of updates?	Could be included in guidance, general guideline to review and update if required once per audit cycle.	Comment addressed with SFI Section 7 Guidance - Biodiversity in Fiber Sourcing.
29	1.2.1	The indicator in regards to an assessment is so broad it is hard to determine what the assessment would look like. This indicator needs much more refinement into what the assessment should look like. The way it is written an auditor could run wild with what is required.		Comment addressed with Indicators 1.2.1 & 1.2.3 and SFI Section 7 Guidance - Biodiversity in Fiber Sourcing.





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24	1.2.1	FECV is a loosely defined concept that is difficult for program participants to quantify and develop programs around. Furthermore, it is even more difficult to communicate the concept and concerns associated with it to contractors and/or landowners. We have well developed laws to protect endangered species and critical habitats. Individual landowners may have their own “values” with respect to conservation of particular species or habitat. There is little consistency between state agencies, NGO’s and conservation interests who all claim to identify FECV. To create a regional assessment is extremely difficult, could be extremely involved and in the end has little to no value to the wood producer or their customer. Please identify specifically the level of “concern” that a program member should be concerned about. For example, state level G-1, G-2, G-3 listed species. Or federally designated Threatened and/or Endangered species.		Comment addressed with Performance Measure 1.2 & SFI Section 7 Guidance - Biodiversity in Fiber Sourcing.



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25	1.2.1	Need more guidance on this indicator: 1) what should be included in this assessment 2) how to define procurement area(s), 3) requirements for updating, 4) required "action items". . Need flexibility and guidance around regional FECV assessments. For example, procurement areas may contain many elevations and landscape types, would be confusing to have all assessments combined in one report to give to all loggers. Flexibility in defining procurement area. What are any action items from the assessment? How often do we need to update? Suggest limiting distribution to wood producers to reduce complexity of a general "public" distribution and not sure what a general public distribution would accomplish.	Certified Organization shall conduct an assessment, individually or collaboratively, of Forests with Exceptional Conservation Value, defined as critically imperiled and imperiled species and ecological communities, within their wood and fiber supply area(s). This assessment should identify forest-based terrestrial FECV species and scope of assessment can be determined by certified organization based on supply area characteristics. The Certified Organization shall make the summary(s) of the assessment available to wood producers.	Edit addressed with Indicators 1.2.1 & 1.2.3 and SFI Section 7 Guidance - Biodiversity in Fiber Sourcing.
33	1.2.2	We appreciate that Certified Organizations only have to enact one of items a-e in order to meet the indicator.		Noted.
34	1.2.2	Support this addition and will significantly strengthen the Fiber Sourcing standard and Certified Sourcing claim in the marketplace and with brands/sceptics of SFI.	NA	Noted.
35	1.2.2	There is no need to repeat "(critically imperiled and imperiled species and ecological communities)" throughout the requirements since they are included in the definition of FECVs. Remove	2. Program to address Forests with Exceptional Conservation Value for all harvest operations through fiber sourcing activities such as:	Edit considered but not accepted as it does not improve the requirement.



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		from this Indicator along with other occurrences.		
36	1.2.2	This entire clause is a disaster. Very unclear and confusing to read. Nearly impossible to apply and audit. "...for all harvest operations through fiber sourcing activities, such as..."?!? List of activities all appear elsewhere in the standard - so what's the point?	This clause appears intended to credit other parts of the FS standard as "counting" for an FECV "program". That's a policy not a performance indicator. This should be substantially re-thought or simply dropped.	Comment addressed with Performance Measure 1.2 & SFI Section 7 Guidance - Biodiversity in Fiber Sourcing.
38	1.2.2	La sensibilisation des propriétaires forestiers devrait se faire en partenariat avec les intervenants en forêt privée qui sont déjà en contact avec les propriétaires et en ciblant également les conseillers forestiers qui sont des intermédiaires importants au niveau du propriétaire en ce qui concerne l'aménagement forestier.	2.d. la sensibilisation des propriétaires forestiers, en collaboration avec les organismes intervenants en forêt privée (syndicats de producteurs de bois, conseillers forestiers),	Edit addressed with Indicator 1.2.2 & SFI Section 7 Guidance - Biodiversity in Fiber Sourcing.
37	1.2.2	Again, this is so vague it is hard to understand what the assessment would look like. How does one incorporate the findings into purchased stumpage? This needs much more clarification.		Comment addressed with Performance Measure 1.2 & SFI Section 7 Guidance - Biodiversity in Fiber Sourcing.
49	1.2.2c	Its my opinion that the in-forest-verification by certified logging companies provides much stronger assurances for addressing Biodiversity, rather than simply relying on training qualification of employees. Certified Logging Companies in my state are audited internally by contracted foresters and also the group is audited by a third-party- Nepcon. To me this		Noted.



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		provides the SFI Fiber Sourcing label more credibility with not only Biodiversity but, BMP adherence, legal requirements etc.. Master Logger and SFI are working on parallel paths, so why not work together?		
50	1.2.2c	This a great addition to the standard. Assurances for protecting Biodiversity through in-the-forest verification is a big step in the right direction. Why not use all the tools in the toolbox? Certified Logging Companies are that tool.		Noted.
41	1.2.3	Support this addition and will significantly strengthen the Fiber Sourcing standard and Certified Sourcing claim in the marketplace and with brands/sceptics of SFI.	NA	Noted.
42	1.2.3	Eliminate unnecessary words "conduct and" "stand level" creates confusion. Requirement should simply focus on harvests of purchased stumpage. It should be noted that State Natural Heritage is not available at the stand level. This requirement should be reworded to allow for county or landscape level.	3. Certified Organization shall incorporate results of their Forests with Exceptional Conservation Value assessment in harvests of purchased stumpage.	Edit addressed with Indicator 1.2.3 & SFI Section 7 Guidance - Biodiversity in Fiber Sourcing.
43	1.2.3	What is meant by <u>conduct</u> and incorporate results...? Is this the same as PM 1.2.1 with distinction it is for purchase stumpage?	Suggest using same wording as PM 1.2.1 "conduct an assessment..."	Edit addressed with Indicator 1.2.3 & SFI Section 7 Guidance - Biodiversity in Fiber Sourcing.
44	1.2.3	This is an unrealistic indicator and adds yet another layer of documentation and work for each stumpage purchase project. We purchase stumpage from small private landowners with as little as 2-3 acres up to Federal timber sales		Comment considered but not accepted as it does not improve the requirement.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
		that have tens of thousands of acres in the project area and thousands of acres of harvests and hundreds of stands. If we have the programmatic risk assessment required in Indicator 1, why do we need to do this? Once again, the information has little to no value to the landowner, producer or customer yet will come at great cost to the program participant.		
45	1.2.3	Inclusion of “at the stand level” in the performance measure is inconsistent with other landscape scale requirements of the Standards & Rule. The Idaho SFI SIC requests removal of “at the stand level”.		Comment addressed with Indicator 1.2.3 & SFI Section 7 Guidance - Biodiversity in Fiber Sourcing.
39	1.2.3	Performance measure 1.2 indicator 3 of the revised fiber sourcing standard says , “Certified Organizations shall conduct and incorporate the results of a Forests with Exceptional Conservation Value assessment at the stand level for purchased stumpage.” Why was this changed to tracking at the stand level? It is impractical and most cases impossible for a Certified Organization to track purchased stumpage to a stand level. Tracking to a ownership or county level is more practical. Simply removing the words “at the stand level” would solve this problem. All other mentions of FECV’s in the standard are at a landscape level, not at a stand level.		Comment addressed with Indicator 1.2.3 & SFI Section 7 Guidance - Biodiversity in Fiber Sourcing.



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40	1.2.3	When sourcing fiber from another SFI Certified Organization it should be understood that FECV were considered by them under their Forest Management Standard. It is redundant to require the mill, under the Fiber Sourcing Standard, to also complete an FECV assessment, and it adds unnecessary work.	Recommendation: Change this indicator to reflect that the FECV assessment is not necessary when sourcing from lands/organizations certified under the SFI Forest Management Standard, or comparable forest management certification standards.	Comment addressed with Performance Measure 1.2 & SFI Section 7 Guidance - Biodiversity in Fiber Sourcing.
46	1.2. 1 & 1.2.3	L'information sur les espèces menacées ou vulnérables ainsi que forêts exceptionnelles n'est pas toujours disponible ou exhaustive	«L'organisation certifiée doit mener ou planifier mener...»	Edit considered but not accepted as it does not improve the requirement.
47	1.2.1 & 1.2.3	Definition is included in standard for purchase stumpage (term used in USA), would be beneficial to include distinction or definition with "purchase wood" - wood purchased from variety of sources public and private, no management responsibility.	Suggest definition of "purchase wood" and relate to definition of wood producer	Task Group decided that purchase wood was a commonly understood term and does not need definition.
48	1.2.1 & 1.2.3	A stand-level assessment on purchased logs over such a large area may be unattainable due to seven eco-regions in our state representing a wide variety of forested stands, vegetative communities, and an abundance of fisheries/wildlife diversity. Any assessment would need to be at a much broader scale than at a stand level.		Edit addressed with Indicators 1.2.1 & 1.2.3 and SFI Section 7 Guidance - Biodiversity in Fiber Sourcing.
30	1.2.1	Implies certified organizations must solely conduct their own assessments.	Conducting or participating in local and regional landscape assessments	Edit addressed with Indicators 1.2.1 and SFI Section 7 Guidance -



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
				Biodiversity in Fiber Sourcing.
31	1.2.1		This section may require wood producers to maintain separate FECV files for each mill they deliver to.	Comment addressed with Indicators 1.2.1 and SFI Section 7 Guidance - Biodiversity in Fiber Sourcing.
32	1.2.3		Replace stand level with appropriate scale.	Edit addressed with Indicator 1.2.3 and SFI Section 7 Guidance - Biodiversity in Fiber Sourcing.
9	1.2	Additional Requirements- If you are a certified organization to the fibre sourcing standard and own or manage Forestlands you should not also have to conform to the SFI 2022 Forest Management Standard. It is time for the Fiber Sourcing Standard to take this next step to becoming its own autonomous standard.	SFI Certified Organizations that own or have management authority for forestlands are encouraged to certify to the SFI 2022 Forest Management Standard.	Edit considered but not accepted as it does not improve the requirement.
10	1.4	native or naturally occurring species and habitats	revise to 'native or naturally occurring species and habitats'	Edit addressed with Principle 4 - Protection of Biological Diversity.
11	1.4	Introductory paragraph- As an industry dependent on a landowner's ability to legally conduct forestry we request the proposed change to the language relative to the protection of private property rights not be modified or softened.	Not make the proposed change.	Edit considered but not accepted as it does not improve the requirement.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
12	1.4	Throughout the various sections of the report there is an inconsistent use of the terms "pests", "diseases", "insects and diseases", and "pathogens". For example, on pg 4 of this section of the clean report: "...undesirable levels of wildfire, pests, diseases, invasive species and other damaging agents...". The term pest is generally defined as any organism or damage agent designated as detrimental to effective resource management.	Recommend changing to: "...undesirable levels of wildfire, pests, and invasive species..."	Edit addressed with Principle 2 - Forest Productivity and Health.
13	1.6	<u>Fiber sourcing within the United States and Canada (Objectives 1-10 apply).</u> This line should be deleted since all Objectives would apply to all Certified Organizations.		Noted.
51	2.2	Include /reference CLC as an option for verifiable monitoring system. CLC's programs have documentation and reports through their "in-the-forest-verification". Sharing of this information that BMP's are being adhered to could strengthen FS.	2.2.3 Promote the use of CLC's as in-the-forest verifiable monitoring source of adherence to BMP's.	Edit addressed with PM 3.1. and PM 3.2.
56	2.2.a	Support the placement of this here vs. existin 2.1.1. Agree with new language.	NA	Noted.
52	2.2.1.a	"confirm" seems to be strong language. What about circumstances when BMP issues occur, but CO performs actions to resolve	a. comply with best management practices on harvests of purchased stumpage;	Edit addressed with Indicator 2.2.1 a.
53	2.2.3	This is a great place to include Certified Logging Companies as a verifiable monitoring tool. This could be 2.2.3 "Use of Certified Logging Companies, where available, to ensure rates of conformance and BMP adherence		Comment addressed with PM 3.1. and PM 3.2.





Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
54	2.2.5	Reference to program participant	Update reference from program participant to certified organization	Comment addressed with Indicator 2.2.1.
55	2.2.5	What is the difference from "purchase stumpage" in a) vs b) "wood producers supplying"? Both terms are included in the definition section, would be helpful to understand distinction in the USA and Canadian contexts.	Add guidance distinguishing between purchase "stumpage", and purchase wood or "wood producers supplying"	Comment addressed with Indicator 2.2.1 and SFI Section 7 Guidance - Objective 2: Best Management Practices.
57	3	Why doesn't this title include Certified Logging Companies? This seems to be a relevant place for Certified Logging Companies.		Comment addressed with Objective 3.
58	3	Objective 3. Use of Qualified Resource and Qualified Logging Professionals. (Qualified Resource Professional)		Comment addressed with Objective 3.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
59	3	<p>Despite the attempt to clarify the difference between QLP and CLP by changing CLP to CLC, this was clearly ineffective given all the chaos and confusion on the webinars (such as "is this CoC certification, is this required, is training required for members of a CLC, who will conduct the training, etc.). SFI missed the boat on creating meaningful value and differentiation within the standards and now any attempt to do so is likely to lead to additional confusion and complexity at a time when the marketplace and logging workforce is in no position to leverage or respond. (In some states, very strong, rigorous programs like MN Master Logger Program have dissolved due to the inability to create value.)</p> <p>Strongly recommend removal of CLC / CLP concept entirely from the standard and rules. If SFI Inc wants to provide recognition to Certified logging organizations/programs (aka Master Loggers) then SFI Inc. should do so via a mutual recognition MOU and do so at a national level and take on the responsibility of ensuring these programs are credible, well-managed to meet the SFI requirements, etc. This is not an appropriate role for SICs and stands to create unnecessary and damaging relationship/partnership impacts across the supply-chain which could have unintended consequences for SICs and member companies.</p>	<p>Ideal Option: Recommend removal of all references to "Certified Logging Companies" (and the former CLPs) and the endorsement process by SICs from the SFI Standards and Rules.</p> <p>Back-up Option: If CLC as a concept is left in due to political pressure or other reasons not clearly justified on the webinars, then efforts need to be taken to be VERY clear with verbiage to differentiate from the training aspect and status of INDIVIDUAL loggers vs. a certification program managed by an association/non-profit (aka Master Loggers). We are not really talking about a "certified logging company" which opens the door for understandable confusion and perceived reference to CoC certified loggers / companies ... which are in essence certificate holders.</p> <p>Need to decouple in ALL written and verbal statements</p>	<p>Comment addressed with PM 3.1 and PM 3.2 and SFI Section 7 Guidance - Use of Qualified Logging Professionals, Qualified Resources Professionals and Certified Logging Companies.</p>



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
		Support the points made by NY SIC and ME SIC. The burden and responsibility of recognizing and ensuring proper management and compliance with SFI standards is not an appropriate role for an SIC. SICs are not set-up to certify that a logger or logging program/association/company is complying with the SFI requirements, but rather that the training meets the SFI requirements. That should be the focus and requirement, period.	<p>the idea of training requirements/tracking relative to responsibilities of Certified Companies or “companies” in general. Certificate Holders (vs. “company”) are required to “stive to achieve” 100% use of QLP with at least one QLP on-site “regularly.” Every time we refer to “training being tracked by the ‘company’” or “conducted by the ‘company’” I think we create confusion and continue to muddy the waters. Suggest using the word "organization" vs "company."</p> <p>The purpose and benefits of the Certified Logging IRgabuzatuib concept has nothing to do with training but rather with a supposed higher degree of confidence that other SFI requirements are being implemented in operations. To be a member of a Certified Logging Organization you must AT A MINIMUM be a QLP. Period. That decouples it and puts the training and tracking</p>	



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
			responsibility off of the certified logging organization so that they can then focus on things such as auditing implementation of BMPs, tracking certified fiber (if they also have a CoC certificate), reduces risk to Certificate Holders (not "companies") using a Certified Logging Organization due to the independent audits by the Certified Logging Organization, etc. SFI Inc. should be responsible for tracking and ensuring Certified Logging Organizations have a credible standard that aligns with SFI principles and that annual audits, corrective actions, and stakeholder/public complaints process is adhered to.	
60	3	CLC's are not included in the heading.  Reorder prioritization of professionals to incentivize use of CLCs	Add "certified logging companies" to the heading of the Objective.  Revise text under the Objective heading to read: "To encourage forest landowners to utilize qualified resource professionals and certified logging companies, and where	Comment addressed with Objective 3, PM 3.1, PM 3.2 and SFI Section 7 Guidance - Use of Qualified Logging Professionals, Qualified Resources Professionals and Certified Logging Companies.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
			they do not exist, to utilize qualified logging professionals."	
61	3	This excludes CLC in the title yet references in the description---- Objective 3: Use of Qualified Resource and Qualified Logging Professionals- To encourage landowners to utilize the services of qualified logging professionals, certified logging companies and qualified resource professionals.	Objective 3: Use of Qualified Logging Professionals, Certified Logging Companies, Qualified Resource Professionals	Comment addressed with Objective 3.
62	3	These labels for trained foresters/loggers/contractors and should be better defined. "Qualified" and "Certified" are terms used throughout the document and get very confusing. We would suggest either clarifying the language or using one term and all resource professional are under this umbrella.		Comment addressed with definitions of 'qualified logging professional' and 'certified logging company'. See SFI Section 14 - Definitions.
63	3 and 6	The Forest Management Standard combines requirement for use along with support of training and education all under Objective 12. Can these objectives be combined to somewhat streamline the Fiber Sourcing Standard?	Combine Objective 3 and Objective 6 in the Fiber Sourcing Standard by adding Objective 3 as a Performance Measure that precedes current Performance Measure 6.1.	Comment addressed with PM 6.2.
64	3 and 6	The Forest Management Standard combines requirement for use along with support of training and education all under Objective 12. Can these objectives be combined to somewhat streamline the Fiber Sourcing Standard?	Combine Objective 3 and Objective 6 in the Fiber Sourcing Standard by adding Objective 3 as a Performance Measure that precedes current Performance Measure 6.1.	Comment addressed with PM 6.2.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
65	3.1	CLCs should be prioritized as the preferred option for logging professionals to promote increased participation in independently certified MLPs	See above comment for Objective 3	Comment addressed with PM 3.1.
66	3.1.2	Despite comments made today in the Logger Training and Education webinar our procurement staff is well versed in what Objective 3 is, Use of Qualified Resource and Qualified Logging Professionals. They are able to communicate this to others as well as our third party auditors. They understand the core requirements to be recognized as a QLP and track continuing education requirements for the states we operate in. Our auditors are very capable and competent. Every audit they have conducted on our operation, they have made use of State databases that track QLP continuing education requirements.	No changes necessary	Comment addressed with PM 3.2.
67	3.1.2	Change Program Participant to new term and improve sentence structure.	2. List of qualified logging professionals and certified logging companies maintained by a Certified Organization, appropriate agency, loggers' association, or other organization.	Comment addressed with Indicator 3.2.1.



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68	4	The objective adds “international” to the list of laws and regulations that a program participant must comply with, yet “international” laws are never referenced in either the PM or Indicators. The addition of “international” expands the scope beyond what is reasonable for a program participant to consider. Quite honestly, there is no such thing as an “international law” that is binding upon a program participant that is not somehow adopted via “federal, provincial, state and local” Laws. Please remove the reference to “international”.		Comment considered but not accepted as it does not improve the requirement.
69	4	"To comply with all applicable laws and regulations including international,..." What is the expectation about international. Could this mean Treaty or Convention?		Comment considered but not accepted as it does not improve the requirement.
70	4	Inclusion of all applicable laws "including international".	Consider defining the expectation regarding international laws/regulation.	Comment addressed by new Objective 11.
72	4	How do we follow international laws? What are the International laws? Other countries laws? The laws that should be followed are the state and federal law that the work is being conducted in.	The word “International” should be stricken from this Objective.	Comment considered but not accepted as it does not improve the requirement.
73	4	There should be a disclaimer that Objective 4 does not cover the legal and regulatory compliance of wood producers. This objective is only for the Certified Organizations. There is an assumption that the actions of wood producers are covered under this and that is not the case.	Objective 4- Disclaimer: Objective 4 does not apply to the legal and regulatory compliance of wood producers supplying the fiber to the Certified Organizations.	The requirement is the responsibility of the Certified Organization to implement and meet.



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74	4	This objective adds “international” to the list of laws and regulations that a program participant must comply with, yet “international” laws are never referenced in either the PM or Indicators. The addition of “international” expands the scope beyond what is reasonable for a program participant to consider.		Comment addressed by PM 4.1.
75	4	Not all certified companies operate internationally. The Idaho SIC requests language clarifying the existence of domestic firms by adding “within your areas of operations”.		Edit considered but not accepted as it does not improve the requirement.
71	4	Elevate the issues of health and safety of workers.	Consider adding an Indicator 4.3 to specifically address health and safety of workers. Look at CoC Indicators 8.2.4 and 8.2.6 for guidance.	
76	4.1	Inclusion of "social" laws appears to be redundant with PM 4.2 which focuses specifically on compliance with applicable social laws.	Delete "social" from PM 4.1	Edit addressed with PM 4.1.
77	4.1.1	Implies that the assessment required in 1.6.1.2.1 must be done at the stand level in order to be applicable.	This will be especially difficult for wetlands and road requirements. For example, state Department of Transportation road regulations cover multiple different documents of thousands of pages each.	Noted. Access can be via online platform.
78	4.1.1	More important than access to laws, which is typically universal in North America, is familiarity with and knowledgeable of applicable laws and regulations.	Change "Access to" to "Familiar with and knowledgeable of ..."	Edit considered but not accepted as it does not improve the requirement.





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79	4.1.2	The indicator lacks reference to international law, making it inconsistent with the Objective.	...with applicable international, federal, provincial, state, or local laws and regulations.	Edit addressed with Indicator 4.1.2.
80	4.1.2	As currently worded inference is that the CO is not yet in compliance e.g. must "achieve" compliance.	Replace "achieve" with "maintain".	Edit considered but not accepted as it does not improve the requirement.
81	4.2	Language regarding compliance is inconsistent with PM 10.1.	Delete "... take appropriate steps to ..." so the PM simply states "... comply with ..." which is consistent with PM 4.1.	Edit considered but not accepted as it does not improve the requirement.
82	4.2	Structure and language of Indicators is currently different from that of PM 10.1 despite having identical purposes as applied to different sets of laws.	Restructure the Indicators to functionally mirror those of PM 4.1.while retaining the existing Indicator for PM 4.2. e.g. add three additional indicators that mirror 4.1.1 - 4.1.3	Edit considered but not accepted as it does not improve the requirement.
83	4.2.1	This should be an individual company human resource policy issue and has become overly specific and overreaching with the proposed change. Keep it as it is, state and federal laws already address the issue of discrimination, the standard does not need to get involved in current sociopolitical rhetoric.		Comment considered but not accepted as it does not improve the requirement.
84	4.2.1	Remove the words that were added, "gender equality and diversity inclusion". Both of those are already covered under existing federal laws.		Comment considered but not accepted as it does not improve the requirement. PM 4.2 aligns with PEFC requirement and same



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
				requirement in the SFI 2022 Forest Management Standard.
85	5	"broaden awareness" seems to require a responsibility of educating others beyond the Certified Organization(CO). Reword to clarify requirement of awareness within the Certified Organization.	Objective 5. Forestry Research, Science and Technology To invest in forestry research, science, and technology to promote sustainable forestry practices and be aware of climate change impacts on forests, wildlife and biological diversity.	Edit addressed with Objective 5.
86	5.1.1	Add the term "such as" into this indicator. The current indicator has the term "Examples include" but the updated version may just have missed including this term.	Financial or in-kind support of research to address questions of relevance in the region of operations <i>such as</i> forest productivity, water quality....	Edit addressed with Indicator 5.1.1.
87	5.1.1	Unclear wording	"Examples could include" should not have been removed.	Edit addressed with Indicator 5.1.1.
88	5.1.1	Deletion of "Examples could include" implies that all topics are required. Reword to provide clarity.	1. Financial or in-kind support of research to address forest management questions and/or broaden understanding of potential benefits and impacts. Research areas may include, but are not limited to, forest productivity , water quality, biodiversity, landscape ecology, community issues,	Edit addressed with Indicator 5.1.1.



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			Forest Inventory Analysis, or SFI Conservation Grant Program.	
89	5.1.2	Are there any Certified Org's conducting research on GMO trees? Aren't all CO's required (by Obj. 4) to comply with applicable laws & regulations?	Unnecessary and redundant. Drop it.	Former indicator removed. Reliance placed on the SFI Policy for Forest Tree Biotechnology. See Section 8 - SFI Policies.
90	5.1.3	No measurable impact to be gained from documenting how sharing of knowledge was considered compared to how was actually implemented. Consider is a very limited action, especially when funding or in-kind support may not provide the level of involvement to warrant being primary source of information sharing.	Change "consider" to "support"	Edit addressed with Indicator 5.1.2.
91	5.1.3	Suggested streamlining of indicator for more clarity	Should have a program to share knowledge <i>within the organization</i> gained through research to influence sustainable forest management.	Edit addressed with Indicator 5.1.2.
92	5.1.3	This section seems out of place here and more in line with 5.3.	Move indicator to 5.3	Comment considered but not accepted as it does not improve the requirement.
93	5.1.3	The action verb "Consider..." has no place in a performance indicator. Is this indicator intended to be optional? If so, what's the point?	Indicator should read "Share knowledge..." or be dropped.	Edit addressed with Indicator 5.1.2.



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94	5.2	We believe contributing to multi-party analyses is equally important as developing unique analyses or using them when completed, and that they are important at the national level as well as state and regional levels. This wording additions proposed here are in support of the addition of Indicator 5.2.2 above.	Performance Measure 5.2. Certified Organizations shall individually and/or through cooperative efforts involving SFI Implementation Committees, associations or other partners develop, contribute to, or use national, state, provincial or regional analyses in support of their sustainable forestry programs.	Edit addressed with PM 5.2.
95	5.2.2	We propose a 2nd (new) indicator underneath the performance measure that requires support for sustainability analysis and research. We believe it should be required for any entity desiring SFI certification to cooperate with and contribute to national level sustainability tracking research programs, such as Forest Inventory and Analysis (FIA) in the United States and NFI (National Forest Inventory) in Canada. These multi-stakeholder efforts are the best way to track and tell the story of the importance of sustainable forest management.	Indicator 2. Participation, individually and/or through cooperative efforts involving SFI Implementation Committees and/or state and federal association and/or associations at the national, state, provincial, or regional level in federal forest inventory programs, including but not limited to efforts to: <ul style="list-style-type: none"> <li>a. collect forest inventory data from field plots</li> <li>b. survey mills regarding the use of roundwood, and</li> <li>c. collect data about private landowner demographics and intentions</li> </ul>	Edit considered but not accepted as it does not improve the requirement.



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96	5.3	This section refers to broadening awareness of climate change impacts, but indicators are both related to gathering information only and do not represent broadening of awareness.		Comment addressed with PM 5.3.
97	5.3	Consistently use “individually or collaboratively” phrase throughout requirements rather than “individually and/or through cooperative efforts”(cf. 5.1, 5.2, 5.2.1, 5.3, 6.2, 6.3).	Certified Organizations shall individually or collaboratively with SFI Implementation Committees , associations or other partners be aware of climate change impacts on forests, wildlife and biological diversity.	Edit addressed with PM 5.3.
98	5.3	Both indicators in this PM have always been meaningless. "Where available, monitor information..." is embarassingly weak. "...are knowledgible..." is unauditable.	Take another look at the excellent new language in Section 2, Obj. 9. Look for things that might apply to FS.	Noted.
99	5.3	Broadening awareness is a communications function, separate from investing in research. Innappropriate to single out single topic, in the same way that "invest in research and inform landowners about invasive species," would not go together in same objective.	Create a separate climate-focused objective in fiber sourcing as was done for forest management.	Task Group determined that given the scope of the Fiber Sourcing Standard, the Climate Smart Forestry objective is best kept in the SFI Forest Management Standard. For the Fiber Sourcing Standard, the topic of Climate Change is addressed in PM 5.1 and PM 5.3.



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100	6	Re. logger training databases, there may be some need for clarifications regarding individual names vs company name in a database and 'auditability' of the names.		Noted. However, logger databases are beyond the scope of the Standard. The requirement in Ind. 3.2.1 is that the Certified Organization has access to a list of loggers.
101	6	We have commented on this standard and other like wording multiple times. It is simply unrealistic to expect we will ever get to 100% of supply from trained contractors. It quite honestly is discriminatory in nature, yet the rest of the standard discourages discrimination. We deal with a lot of landowners who do their own logging as a hobby or part time task. They will never fit into a professional logger training curriculum, nor is it beneficial to expect them to take one. If they are doing a good job on the ground, generally meet the remainder of the procurement policies, why should they be penalized for not having a training status? It is ironic that in a state that has no professional logger training, there is no requirement under this Indicator, yet if you have a high-quality voluntary program that captures 80-90% of the logging community, you are expected to get 100%.	needs to be re-written to something along the lines of <i>"Certified Organizations will strive to maximize their raw material deliveries from qualified logging companies striving for continual improvement and expansion of educational opportunities for all suppliers."</i>	Edit addressed with PM 3.2.



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102	6	The Minnesota SIC appreciates the success of SFI Logger Education and feels that logger training in our state is exceptional. While we understand that the impetus for changing the Standard is to “add more structure to the qualified logging professional training requirements and raise the overall quality and impact of logger training”, we believe that the revision as written is confusing and leaves much to interpretation.		Noted. No edit proposed.
103	6	We feel that there is too much ambiguity in the term “...strive to achieve 100 percent of their raw material deliveries from qualified logging professionals...”. It is very difficult to quantify how one “strives” for a goal, or to clearly demonstrate to an auditor how you have striven to accomplish this. Most mills have some de minimus level of fiber that comes from sources that will never go to the effort to achieve logger training, like private landowners, tribal nations, small arborist operations, etc. Also, some of our mills receive fiber from Canada, which has a far different training program and means of tracking logger education training. Therefore, once they meet some level of sourcing from QLPs it becomes nearly impossible to “strive” for more.	Recommendation: Clarify or define “strive” in a manner clear to auditors and Certified Organizations.	Edit addressed with PM 3.2.



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104	6	The Standard puts most of the onus for good on-the-ground forest management upon the logger, with few requirements for foresters who design and administer the sale. We have seen many cases where the logger is more familiar with our forest management guidelines (FMGs) than the sale administrator. We realize this issue is touched upon by Objective 6, Performance Measure 6.1, Indicator 3, but we feel that “education and training sufficient to their roles and responsibilities” is often interpreted as having a basic education in forestry. Perhaps there is room to insert something in the Forest Management Standard requiring continuing education for timber sale designers and administrators, with an emphasis on BMPs or FMGs. It is not necessary in the Fiber Sourcing Standard, as most procurement foresters in Minnesota are not setting up timber sales, and they often already attend logger education courses.	Recommendation: Consider adding an indicator to the Forest Management Standard for continuing education on BMPs and FMGs for all staff involved in laying out and administering timber sales.	Comment considered but not accepted as it does not improve the requirement.
105	6	See comments about definition of "wood producer", "qualified logging professional", "certified company", in the Forest management comments.		Comment addressed with definitions of 'wood producers', 'qualified logging professional' and 'certified logging company'. See SFI Section 14 - Definitions.





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106	6	These labels for trained foresters/loggers/contractors really needs to be better defined or restructured. "Qualified" and "Certified" are terms used throughout the document and get very confusing. We would suggest either clarifying the language or using one term and in the definitions define that all of these resource professional are under this umbrella. It is very confusing seeing these different terms.		Comment addressed with definitions of Qualified Logging Professional and Certified Logging Company - see SFI Section 14 - Definitions.
107	6.1	This objective concerned us, but after listening to several webinars, many of our questions were answered. It would have helped if in the documents or side notes that "Core" training requirements and annual training would be left up to the local SIC. We would suggest that the local SIC's also determine the training standards for Continuing Education (timing).		Comment addressed with PM 6.2.
109	6.1	If the percentages of trained loggers and material recieved from trained loggers is so high should the auditing intensity of logger training go down? With the direction of strive for 100% and the 2015-2019 standard asking for this to be in contracts are we at a threshold where less time can be spent on this in the future? Can this direction come from SFI and not at the auditing bodies discretion?		Comment addressed with Indicator 3.2.2.
110	6.1	Is "crew" defined?		Yes - see SFI Section 14 - Definitions.



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111	6.1	If the revised fiber sourcing standards require the use of "qualified logging professionals" to assure the protection of FECV's and biodiversity, shouldn't this training then, be part of the "core training" for SFI trained loggers? Is it?		Comment address by Indicator 6.2.1.
112	6.1	<p>"Forests with Exceptional Conservation Value" be removed from a Core Training requirement. This is a biologic technical consideration at the landscape scale that is the responsibility of qualified forest professionals with the appropriate forest ecology qualifications and not the responsibility of loggers on the ground.</p> <p>Regarding the new Core Training requirement for Forests with Exceptional Conservation Value (FECV), the NY SIC does not believe this landscape value effort of SFI should be placed on loggers. We do not inherently have anything against FECVs but believe that this is the responsibility of foresters or land managers who have the necessary forest ecology training to both identify and manage these conservation landscape values. Loggers follow the direction of the foresters and land managers who know and can identify FECVs (as well as other forest ecology and silviculture values) and loggers should not be responsible for them. While in NY we do have basic "Forest Ecology &amp; Silviculture" training as part of our basic logger training, we do not get into the depth and breadth of FECVs.</p>		Comment considered but not accepted as it does not improve the requirement.



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113	6.1	<p>"Forests with Exceptional Conservation Value" be removed from a Core Training requirement. This is a biologic technical consideration at the landscape scale that is the responsibility of qualified forest professionals with the appropriate forest ecology qualifications and not the responsibility of loggers on the ground.</p> <p>Regarding the new Core Training requirement for Forests with Exceptional Conservation Value (FECV), the NY SIC does not believe this landscape value effort of SFI should be placed on loggers. We do not inherently have anything against FECVs but believe that this is the responsibility of foresters or land managers who have the necessary forest ecology training to both identify and manage these conservation landscape values. Loggers follow the direction of the foresters and land managers who know and can identify FECVs (as well as other forest ecology and silviculture values) and loggers should not be responsible for them. While in NY we do have basic "Forest Ecology &amp; Silviculture" training as part of our basic logger training, we do not get into the depth and breadth of FECVs.</p>		Comment considered but not accepted as it does not improve the requirement.



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114	6.1	<p>The definition of “qualified logging professional” is too broad and has a gap that could result in untrained or minimally trained individuals able to work in the woods and possibly dilute the impact of SFI on improving performance in the woods.</p> <p>At minimum, the 2022 SFI standard should require that all persons working in the woods, including but not limited to hand fallers, equipment operators, and support staff (mechanics) be trained in first aid/CPR, OSHA rules, and in-woods rescue and evacuation. All persons operating equipment in the woods must be trained in BMP’s and state laws. All independent owner-operators must also meet this standard, although some leeway could be granted for owner-operators who deliver insignificant quantities to participating mills. This minimum, required training should be re-taken at least once every 3-5 years.</p>		Comment address by Indicator 6.2.1.
115	6.1	We suggest that “Core” training requirements and annual training would be left up to the local SIC. We would suggest that the local SIC’s also determine the training standards for Continuing Education.		Comment considered but not accepted as it does not improve the requirement.
116	6.1 / 12.1	<p>How are SIC's supposed to fund logger training if there are other pathways to achieve training?</p> <p>How can state SIC's ensure certified training programs are covering state law requirements of for their Sediment Erosion and permitting laws?</p>		Comment addressed by PM 3.1, PM 3.2 and definition of 'qualified logging professional' and 'certified logging professionals'. See SFI



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				Section 14 - Definitions. See also SFI Section 7 Guidance - Use of Qualified Logging Professionals, Qualified Resources Professionals and Certified Logging Companies.
127	6.1	Insister sur le fait qu'il s'agit d'un but et non d'un obligation. Il faut prévoir que cet objectif pourrait être difficile à atteindre lorsque le bois provient de multiples petits entrepreneurs forestiers ou propriétaires de boisés.	6. Effort raisonnable pour tenter d'obtenir la totalité de la matière première auprès d'exploitants forestiers qualifiés ou d'entreprises forestières certifiées, s'il en existe ou si le contexte s'y prête	Edit considered but not accepted as it does not improve the requirement.
108	6.1	I'd encourage SFI to include invasive species management as core training. Invasive species, both insects and plants, are huge problems in forestry and management of equipment cleaning and movement of pests in soil, plant material, and forest products is important core knowledge.		Comment address by Indicator 6.2.1 f.
132	6.1.2	Referring to SFI 2021	Should read 2022	Noted.
133	6.1.5	Provide a stated preference for Certified Logging Companies	Revise language as follows: " Certified Organizations shall have written agreements for the use of certified logging companies, or where they are not available, qualified logging professionals and/or wood producers ..."	Edit addressed with Indicator 3.2.2.



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135	6.1.6	Many small landowners log their own land and bring logs to our mill. They do not log any other land other than their own, so they see no need to become certified. If we don't have 100% supply from certified loggers, this is why. It seems requiring certified bodies to have 100% will discriminate these small landowners.		Fiber described would come under the definition of fiber supplied by 'wood producer'. See SFI Section 14 - Definitions.
138	6.1.6	Could the moving toward 100% QPL be addressed in 2.2.2 in goals for improving BMP implementation?		Edit addressed with PM 3.2.
141	6.1.6	It is unclear what "strive" is intended to mean, and what sort of evidence will be expected, particularly in terms of documentation to fulfill this requirement.		Comment addressed by PM 3.2.
142	6.1.6	Indicator 6 uses the term "Strive" for 100% of their raw material deliveries from Qualified logging professionals. There is no way in our large working circle that we would ever be at 100% from Qualified loggers. Commonly, we have ranchers or home owners that log their own land and haul a few loads a year on a truck or trailer. We have worked diligently to continuously improve our percentage of qualified loggers delivering logs to our mill. However, with 50% or more of deliveries coming from Gate Logs purchased and delivered from a very diverse pool of suppliers across our very large working circle, achieving 100% is an extremely high bar that we cannot attain.		Comment addressed by PM 3.2.



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143	6.1.6	"...shall strive to achieve 100 percent of their raw materiel...". In Quebec private forests, or for company sourcing from mill residual chips, it's nearly impossible to demonstrate that deliveries come from qualified logging professionnall or certified logging companies.	"...should strive to maximize the percentage of their raw materiel..." or "...should strive to maximize the percentage of their round wood sourcing..." to be more precise about what kinf of materiel is included in this requirement.	Comment addressed by PM 3.2.
144	6.1.6	Why repeat caracteristic a), b) and c), it is in the definition of the qualified logging professionnall		Comment addressed by PM 3.2 and the definition of qualified logging professional. See SFI Section 14 - Definitions.
145	6.1.6	Suggest removing a-c of this indicator and just leaving "Strive for 100% QLP's and CLP's. Sub indicators a and b are embedded in the definitions. Certified Organizations may not be able to coordinate with all QLP's (either from gatewood suppliers or purchased stumpage sites) to ensure that this risk evaluation be conducted nor will they be able to develop evidence that the QLP has actually been on-site for the amount of time determined under this assessment. Suggest replacing "shall" with "should".	Certified Organizations <i>should</i> strive to achieve 100 percent of their raw material deliveries from qualified logging professionals, or certified logging companies where they exist.	Comment addressed by PM 3.2 and the definition of qualified logging professional. See SFI Section 14 - Definitions.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
146	6.1.6	Can we include some clarification in the guidance of this requirement that this is a practice based measure (strive for 100%) and the requirement is met as long as companies continue to implement activities to maintain maximum use of QLP/CLP's. Provide examples to show that actual % of QLP/CLPs may fluctuate ( ex: increase in salvage operations, logger turnover, supply dynamics) but given on-going programs to maintain high QLP/CLP use, a reduction in % QLP/CLPs are not automatically a non-conformance.		Comment addressed by SFI Section 7 Guidance - Use of Qualified Logging Professionals, Qualified Resources Professionals and Certified Logging Companies.
147	6.1.6	Support moving this from guidance into the normative standard. Keep this focused solely on training to remove any room for confusion/mis-interpretation. This is about training and not the use of CLC.	Delete reference to CLC in Indicator text and 6.1.6.c.	Comment addressed by PM 3.2.
148	6.1.6	"Strive to achieve 100%" - is it expected to increase year over year to achieve 100% or achieve 100% annually?		Comment addressed by PM 3.2. It is understood that eventually the level of deliveries from QLPs/CLCs to a given mill could plateau.
149	6.1.6	The general intent of this indicator is evident, but syntax is very confusing. Is this meant to apply to individuals, organizations, or both? Current language will make this extremely difficult to audit.		Comment addressed by PM 3.2.





Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
150	6.1.6	The ambition intent of this new indicator is admirable, but "...shall strive to achieve 100%...where they exist..." renders it somewhat slippery. Are there places where QLP's do not exist? Would this not contrary to 6.1.4?	Drop "where they exist". Clean up syntax. Clarify whether QLP status applies to individuals or organizations.	Edit addressed by PM 3.2.
151	6.1.6	Provide a stated preference for Certified Logging Companies	"Certified Organizations shall strive to achieve 100% of their raw material deliveries from certified logging companies, or where they do not exist, from qualified logging professionals, who:"	Edit addressed with Indicator 3.2.2.
136	6.1.6	Two questions related to the "Strive for 100%" trained loggers; 1) will the guidance still provide allowances for non-trained loggers such as those involved with salvage operations and small logging firms. 2) what happens if a FS certificate holder hits a ceiling on certified logger % that is less than 100% and can't get higher percentages. Will this be a non-conformance issue?		Comment addressed by PM 3.2 and SFI Section 7 Guidance - Use of Qualified Logging Professionals, Qualified Resources Professionals and Certified Logging Companies. It is understood that eventually the level of deliveries from QLPs/CLCs to a given mill could plateau.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
137	6.1.6	What would be the minimum requirement for deliveries from non QLPs or CLPs? Instead of using the word "strive," wouldn't it be more meaningful to identify what is the highest percentage of delivered wood allowable to be delivered from untrained loggers? It would seem that existing data from the previous 25 year's performances by program participants to calculate an average that would be applicable across the industry.		Comment addressed by PM 3.2 and SFI Section 7 Guidance - Use of Qualified Logging Professionals, Qualified Resources Professionals and Certified Logging Companies. It is understood that eventually the level of deliveries from QLPs/CLCs to a given mill could plateau.
140	6.1.6	delete "Strive"	"Certified organization shall have 93% of their raw material deliveries from qualified logging professionals, or certified logging companies where they exist,"	Edit addressed by PM 3.2 and SFI Section 7 Guidance - Use of Qualified Logging Professionals, Qualified Resources Professionals and Certified Logging Companies. It is understood that eventually the level of deliveries from QLPs/CLCs to a given mill could plateau.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
152	6.1.6	<p>There is an important difference between “strive to achieve” and “shall have.” We believe that “shall have” creates a “regulatory certainty” that we are seeking.</p> <p>As to 100% (the SFI language) versus 93%(the ACL language)..we do understand that there is inherent turnover in the industry as well as new businesses coming in on line that might make the 100% target unobtainable, but after over 25 years, the SFI program should be able to confirm that their program participants are capable of receiving at least 93% of their raw wood from trained or certified sources, with the remainder to be considered as “de minimus.”</p>	“Certified Organizations shall have 93% of their raw material deliveries from qualified logging professionals, or certified logging companies where they exist.”	Edit addressed by PM 3.2 and SFI Section 7 Guidance - Use of Qualified Logging Professionals, Qualified Resources Professionals and Certified Logging Companies. It is understood that eventually the level of deliveries from QLPs/CLCs to a given mill could plateau.
153	6.1.6	Indicator 6 uses the term “Strive” for 100% of their raw material deliveries from Qualified logging professionals. Since a large percentage of deliveries comes from gate logs purchased and delivered from a diverse pool of suppliers across a large working circle, achieving 100% is an extremely high bar that is unattainable. We constantly “strive” for improvement and will continue to look for training criteria and methods to improve delivery.		Edit addressed by PM 3.2 and SFI Section 7 Guidance - Use of Qualified Logging Professionals, Qualified Resources Professionals and Certified Logging Companies. It is understood that eventually the level of deliveries from QLPs/CLCs to a given mill could plateau.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
154	6.1.6	SIC members are aware that it is not mandatory to obtain 100 % but it will probably take a lot of time to demonstrate the effort (and have the documents) put in "striving to achieve" this goal.		Comment addressed with PM 3.2.
155	6.1.6	Also, it would be very hard to have numbers of the amount of material coming from qualified logging professional or certified logging companies		Comment addressed with PM 3.2.
156	6.1.6	How will "strive" be assessed? Will it be tied to an increase in trained loggers Year over Year? Is it possible to "strive" for 100% while still maintaining a flat % of trained loggers?		Comment addressed by PM 3.2.
157	6.1.6	As required by the Standard we regularly ask who the operator/logger is in order to track our wood deliveries from QLP's regardless of the individual who is selling us the logs.		Comment addressed by PM 3.2.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
139	6.1.6	If the crew or onsite supervision seems not to be a credible issue and we are still seeing one individual supervising a number of crews, then perhaps the definition of deliveries from trained loggers needs to be addressed instead - right now most mills/agencies only verify the person or company with whom they have the contract/agreement, not who is actually doing the harvesting.		Comment Addressed with SFI Section 7 Guidance - Expectations for On-site Supervision by Qualified Logging Professional and the definition of 'qualified logging professionals' - see SFI Section 14 - Definitions.
134	6.1.6 a	L'effort pour sensibiliser l'ensemble des producteurs est fait, un programme de formation diversifié existe. Pour ceux que nous n'avons pas formés directement, nous mettons tout à leur disposition et nous leur faisons signer un engagement de respect des exigences.	«ont suivi le programme de formation des producteurs de bois approuvé par le comité de mise en oeuvre des normes SFI ou se sont engagé à le suivre.»	Edit addressed with Indicator 3.2.1.
158	6.1.6 a -c	Make it clear that all three criteria must be met. The “and” word should be added after each item. Objective 6, Performance Measure 6.1, Indicator 6, item c: The Guidance section does a good job of defining “onsite regularly”, but it could be strengthened by adding “and/or is available for consultation about operations”. We are also concerned that the wood producer solely determines the level of supervision warranted by the sale. This should be a joint decision by the logger, landowner and permit holder. This can also be interpreted as movement away from the previous requirement of “One QLP per crew”.	Recommendation: Make it clear that the Standard still requires one trained QLP per crew. Also, it would be helpful to include a definition of the term “crew”. Lastly, change the Guidance document to the following: “Expectations for On-site Supervision by Qualified Logging Professional : SFI 2022 Forest Management Standard Indicator 12.3.1 i. and SFI 2022 Fiber Sourcing Standard Indicator 6.1.6 c. and 6.3.1 i. require that a logging crew is supervised by an	Comment addressed by PM 3.2 and the definition of qualified logging professional. See SFI Section 14 - Definitions.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
			individual who “has direct responsibility and is on-site regularly and/or is available for consultation about operations, in order to consistently carry out the roles and responsibilities of the wood producer”. It is understood a logging crew will not be under the supervision of a qualified logging professional (QLP) at all times given the additional responsibilities that can be placed on the supervisor such as dealing with equipment failures, etc. Also, it is understood that the environmental and legal risks inherent with a logging site can vary. When assessing whether a logging site needs a QLP-trained supervisor “onsite regularly” it is the knowledge of such risks that needs to be assessed and taken into account. For a site with high biodiversity or water quality values, or a complicated harvest unit boundary, it is reasonable to expect regular onsite QLP supervision of the crew. The principal of the	



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			logging company (or his representative), the timber permit holder, and the landowner (or his representative) should be sufficiently knowledgeable about the harvest unit and its harvest plan to do this risk assessment at the logging job pre-work meeting. Using this assessment, together they can determine the level of onsite supervision required properly harvest the site, or if additional trained supervisors are required on the harvest site.	
163	6.2	SFI could let the SIC decide which element need to be in the core training vs in the continuing education, base on what is important depending on the ecosystem, issues and needs?	Suggest: Participation in or support of SFI Implementation Committees to establish criteria and identify delivery mechanisms for wood producer core training courses that address topics such as: a. awareness of sustainable forestry (...)	



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
166	6.2	Reword for sentence structure and clarity of focus on qualified logging professionals.	Certified Organizations shall work individually or collaboratively with SFI Implementation Committees, logging or forestry associations, appropriate agencies, or others in the forestry community to foster improvement in the professionalism of qualified logging professionals.	Comment considered but not accepted as it does not improve the requirement.
165	6.2	<p>Support this change but recognize that FECV is complex and the responsibility should not be placed on loggers to identify FECVs but rather to generate awareness so that when a certified procurement company requires modifications to management to address FECVs that the logger has a basic understanding of the importance and reasons for the modifications. Perhaps need to clarify in guidance? that the certified procurement company will be responsible for the landscape assessment and for adjusting harvesting/management plans accordingly and it is the responsibility of the logger to have basic awareness such that they can implement the plans in a sensitive manner to conserve the FECV.</p> <p>Core periodic training should include items that Program Participants are required to evaluate and have a feedback loop in the supply area. Example FECV outreach indicator, BMP, and</p>		Comment addressed with Indicator 6.2.1.





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		other indicators that infer/require information feedback to the SICs.		
159	6.2	For tcontinuing education topics is there a requirement or guidance around the timeframe that all topics need to be covered? or does this mean that continuing education training need to include all of those topics?		Comment addressed with Indicator 6.2.2.
160	6.2	Assuming that training programs have the freedom to offer listed continuing education subjects a la carte, and that training participants are not required to complete each CE topic in order to be compliant with the Standards?		Comment addressed with Indicator 6.2.2 f.
161	6.2	While we support the notion of core training, the PM should make it abundantly clear that core training is required to attain QLP status, and continuing education is required to maintain QLP status.		Comment addressed with Indicator 6.2.1 and definition of 'qualified logging professional' - see SFI Section 14 - Definitions.
162	6.2	All supervisors must take the training required of others and obtain at least X hours (8-16) every year of continuing education in other topics as identified in the standard (invasive species, biodiversity, etc.).		Comment addressed with Indicators 6.2.1 and 6.2.2. and definition of 'qualified logging professional' - see SFI Section 14 - Definitions.
164	6.2	Continuing education training course as to be plan every 2 years. There is no time frame for the core training courses. Should it be mentionne "annually"?	"...to establish criteria and identify delivery mechanisms for wood producer annual core training courses that address:..."	Edit addressed with Indicator 6.2.2.
175	6.2.1	Add definition of Core in the definition section	The definition should include content and required frequency	Comment addressed with Indicator 6.2.1.



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176	6.2.1.e	Should require training in OSHA regs only, or in workers rights. Wage and hour rules and employment laws are business management functions that should be part of continuing education.	Change to "safety regulations and worker's rights"	Edit considered but not accepted as it does not improve the requirement.
179	6.2.2	Continuing education is required on at least a two year cycle with no guidance on time or quality. A more meaningful metric for logger training programs would specify minimum contact hours.	For example, core training must include at least 10 contact hours and continuing education at least 4 contact hours every two years.	Edit considered but not accepted as it does not improve the requirement.
181	6.2.2	We want to ensure that the core topics of the training aren't only covered once and that there is an opportunity for SIC's to include items from the core topics in continuing education training	Participation in or support of SFI Implementation Committees to establish criteria and identify delivery mechanisms for wood producer continuing education training courses that includes a <i>refresher of core logger training topics</i> and at least once every two years that address one or more of the following topics:	Edit addressed with Indicators 6.2.1 & 6.2.2.
180	6.2.2	We understand that this indicator allows some states to do training every other year and allow more limited classes. Minnesota has offered training on all topics (a-k) every year, with the attendees selecting which to attend to achieve their 6 hours of continuing ed. The new Standard appears to allow them to take just one class. We realize that the SIC still sets the state training standard and can go beyond the SFI Standard. But more clarity would be helpful.	Recommendation: Make it clear that state SICs can set education standards beyond the requirements of Performance Measure 6.2	Edit addressed with Indicator 6.2.2 f.



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177	6.2.2	Best Management Practices training should be required in both CLE and the initial training.	,best management practices, reforestation, invasive species, forest resource conservation, aesthetics and special sites;	Edit addressed with Indicators 6.2.1 & 6.2.2.
178	6.2.2	All core training topics, including SFI, BMPs, endangered species, should be included in continuing education topics.		Comment addressed with Indicators 6.2.1 & 6.2.2.
182	6.2.2	Reword to allow the option to include core training topics in continuing education.	2. Participation in or support of SFI Implementation Committees to establish criteria and identify delivery mechanisms for wood producer continuing education at least once every two years that address one or more core training topics or following additional topics:	Comment addressed with Indicators 6.2.1 & 6.2.2.
183	6.2.2	Concern that change in wording from "from CE component w/ coursework" to "CE training courses" will require development of actual course rather than CE through various methods (e.g. webinars, weekly meetings, tailgate meeting etc.)	Maintain wording reference to "coursework" to allow for flexibility of delivery.	Edit considered but not accepted as it does not improve the requirement.
184	6.2.2.a	Reforestation is a challenging topic to include in training since it is normally not the responsibility of the wood producer.		Comment considered but not accepted as it does not improve the requirement.
185	6.2.2.g.	Delete logging safety in this indicator. It is listed in both 6.2.1 and 6.2.2.		Comment considered but not accepted as it does not improve the requirement.



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186	6.2.2.h.	Delete this topic as it would require additional tracking and analysis of wood producer training programs that likely will not produce a meaningful impact for continuing education. This topic would be best analyzed by SFI Inc. through information provided in SFI Progress Reports.		Comment considered but not accepted as it does not improve the requirement.
188	6.2.1 & 6.2.2	inconsistent use of language to describe topics (subject, for example "business management") versus learning objective (verb and subject, for example "awareness of" forest/iemerging/etc)	separate out the list imbedded in 6.2.2a, delete the word awareness within 6.2.2	Edit considered but not accepted as it does not improve the requirement.
187	6.2.1 & 6.2.2	Core vs continuing education: logging safety appears in both places and BMPs do not. Suggest putting BMPs in both places and keeping logging safety in continuing ed only since OSHA is in the core section.	put BMPs in both the core and continuing education sections	Comment addressed with Indicators 6.2.1 & 6.2.2.
189	6.2.1 and 6.2.2	Support re-organization and identification of core vs. periodic training requirements. Support this change but recognize that FECV is complex and the responsibility should not be placed on loggers to identify FECVs but rather to generate awareness so that when a certified procurement company requires modifications to management to address FECVs that the logger has a basic understanding of the importance and reasons for the modifications. Perhaps need to clarify in guidance? that the certified procurement company will be responsible for the landscape assessment and for adjusting harvesting/management plans accordingly and it is the responsibility of the logger to have basic awareness such that they		Comment addressed with Indicators 6.2.1 & 6.2.2.



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		can implement the plans in a sensitive manner to conserve the FECV.		
190	6.2.1 and 6.2.2	Logger education should include BMPs, both as "Core" training and as "Continuing Education". BMPs need to be part of all initial training programs, and there needs to be regular required periodic BMP training (at least once every 1 to 2 years) for continuing education as well. The federal and state environmental regulatory/enforcement agencies that deal with water want to see that BMPs are regularly implemented at high levels, and regular required periodic training on BMPs is seen as a good and successful way to get there. Good implementation of BMPs to successfully protect water resources during forestry operations is the main reason the federal and state regulatory agencies have accepted and largely supported the Silvicultural Exemption for NPDES permits for forestry operations. Training programs should also encompass forestry professional beyond just loggers, and trainings should also include foresters and contractors the do site work such as road work, mechanical site prep, planting, firebreaks, chemical applications, etc.	BMP training should be including all Core Logger Training Programs, and it should be required as regular periodic Continuing Education as well. Such BMP training should be required for all forestry professionals involved with work on the site including foresters, loggers, site prep contractors, etc...	Comment addressed with Indicators 6.2.1 & 6.2.2.



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191	6.2.2 h	It is unclear what, “observed trends regarding the effectiveness of the SFI Implementation Committee approved wood producer training programs” means. If it means that we should have a training program monitoring protocol, then that should be an Indicator. But if it means that we should offer continuing ed classes on topics identified as problematic by BMP implementation monitoring, Inconsistent Practices complaints, or through audits, then this description missed the mark. Please reword this topic to better explain its intent.	Recommendation: Make the intent of topic h more clear.	Comment addressed with Indicator 6.2.2.
192	6.2.2h	this is an awkward topic as written when compared to topics a-g, which are much more specific to applied harvesting/forestry practices or operations.	delete from this list	Comment addressed with Indicator 6.2.2.
193	6.3	The Certified Logging company's (CLC) recognition by SFI Implementation Committees is problematic. It represents a significant investment of time and resources by the SIC and sets up a potentially polarizing dynamic should the SIC not recognize the CLC program. Additionally, it's likely in our region NE Master Logger would be the program that would make the application. Their standards are not published and if you look at their website you will see that they are very pro FSC and post articles condemning logger training, a key requirement of SFI. In addition, the NE Master logger program promotes itself as providing quality logging and management services particularly for family forest.		Comment addressed by PM 3.1, PM 3.2, and definition of 'qualified logging professional'. See SFI Section 14 - Definitions.



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		<p><a href="https://youtu.be/4uRHnSO1a9w">https://youtu.be/4uRHnSO1a9w</a></p> <p>If an SIC recognizes NE Master logger, SFI is in essence putting its stamp of approval that Master loggers do provide quality logging and management services. The SICs have no way of knowing or keeping track of the logging firm's performance. This differ significantly from recognizing a QLP training program. In recognizing a training program we are only saying the content of the training is consistent with SFIs requirements and that loggers have taken the training. There is no suggestion by the SIC and by extension SFI, that recognition of a training program guarantees any quality level of services.</p> <p>When SFI recognized Tree Farm there was a lengthy process to go through to make sure TF measured up to SFI with accommodations for scale. If Master Logger is to be recognized, SFI Inc should review their standards at a national level. If that is not possible, I would suggest the whole provision be taken out of the standard. No one benefits other than the MLC program being able to say we are good loggers and that SFI and it's good name, agrees.</p>		
195	6.3	Since the recognition of certified logging companies by SFI essentially constitutes a mutual recognition of another certification program, was there any thought to having that recognition managed entirely at the national level verses the SIC level?		Comment considered but decision taken to leave acceptance of CLCs with the individual Certified Organization. Also, see SFI Section 7



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				Guidance - Certified Logging Companies
196	6.3	Does a certified logging company mean that all employees must be trained?		Comment addressed by definitions of 'qualified logging professional' and 'certified logging company'. See SFI Section 14 - Definitions.
197	6.3	So the training standard has been diluted to company level vs individual? Back to brokers not being on site monitoring daily activities.		Comment addressed by PM 3.1 and 3.2 and SFI Section 7 Guidance - Expectations for On-site Supervision by Qualified Logging Professional.
198	6.3	Logger Certification	As you know, as past chair, I led the efforts by the Maine SIC to review the recognition request by NE Master Logger in 2016. We conducted a paper audit of their program against the Standard, and issued non-compliances for them to address. Subsequently, we used an independent panel to determine if they addressed the issues we raised. They had significant issues, including lack of a requirement for SIC endorsed logger training. They dragged their feet dealing with	Noted.





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			the issues until the Maine SIC finally disengaged, since the Standard was approaching revision, and there was no point continuing until the new Standard was finalized.	
199	6.3	Currently, State SIC's have a mission to build partnerships with various groups and organizations within each state. The current reference to Certified Logging Companies (CRCs) runs contrary to that mission. Master Logger, as part of the American Loggers Council, is not recognized nationally by SFI. Hence state SIC's become evaluators of the local or regional Master Logger programs. Each state SIC should not have the responsibility to determine if Master Logger programs meet SFI standards. Each state SIC should be an advocate for Master Logger programs while the Master Logger program should be assessed and recognized nationally. This approach ensures credibility, consistency, transparency and integrity to the Master Logger program on a national level. Having state SIC's as advocates versus evaluators will greatly enhance collaboration and ensure local and regional concerns are adequately addressed. The national approach was successful for the mutual recognition of the Tree Farm System with SFI. Why is Master Logger being administrated differently? The individual state approach has potential to erode		Comment addressed by PM 3.1, PM 3.2, and definition of 'qualified logging professional' and 'certified logging professionals'. See SFI Section 14 - Definitions. See also SFI Section 7 Guidance - Use of Qualified Logging Professionals, Qualified Resources Professionals and Certified Logging Companies.



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		the credibility SFI has earned, due to inconsistencies in recognizing programs variable performance standards. a mission to build partnerships with		
200	6.3	<p>My experience with the loggers is there continues to be confusion with certification requirements and specifically when it comes to programs such as Master Logger (ML) requesting qualification for the Certified Logging Company (CLC) designation and resulting benefits, in contrast to logger training and education programs for individual SICs. I sincerely believe that it would be in the best interest of all parties to keep the CLC concept out of the logger training and education standard for the following reasons:-</p> <ul style="list-style-type: none"> <li>· Certified Logging Companies (CLC) such as (ML) should be not be evaluated by individual SICs. SFI national is better suited to assess and monitor programs to qualify for CLC programs, to avoid the possible risk of disputes, and encourage collaboration within individual state logging associations and participants. The current events have stressed the industry, and this would contribute to unnecessary divisiveness.</li> <li>· Logger training and education programs have been established for many years and have a proven track record of continuous improvement. These LT &amp; E programs are available to give a detailed report of all the individual loggers that participate. In contrast</li> </ul>		Comment addressed by PM 3.1, PM 3.2, and definition of 'qualified logging professional' and 'certified logging professionals'. See SFI Section 14 - Definitions. See also SFI Section 7 Guidance - Use of Qualified Logging Professionals, Qualified Resources Professionals and Certified Logging Companies.



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		<p>programs such as Master Logger have no training and if so, to my knowledge no reporting requirement.</p> <ul style="list-style-type: none"> <li>· Master Logger programs participants do not currently benefit from any market advantage, and in some instances, advocate for practices that are counter intuitive to good stewardship.</li> <li>· Keeping the CLC designation separate of the SFI Logger Training and Education will contribute to simplify the SFI requirements, and intern result in better overall compliance of SFI standards.</li> </ul>		
201	6.3	<p>Certified Logging Companies stand on their own merit, independent of SFI, by having all references to “Certified Logging Companies” and their endorsement removed from the SFI Standards and Rules.</p> <p>CLCs also carry their own costs to loggers who are already financially challenged in today’s markets and operation environment. Requiring loggers to support a CLC while also expending resources on training that their employees need and benefit from is an unnecessary expense to be imposed by SFI of SICs.</p> <p>In the north east the only existing CLC is NE Master Logger. While the NY SIC does not object to Northeast Master Logger and their mission, we do not want to be in a position of requiring NY loggers or logging companies to be</p>		<p>Comment addressed by PM 3.1, PM 3.2, and definition of 'qualified logging professional' and 'certified logging professionals'. See SFI Section 14 - Definitions. See also SFI Section 7 Guidance - Use of Qualified Logging Professionals, Qualified Resources Professionals and Certified Logging Companies.</p>



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		<p>part of an independent organization. Already the vast majority of logger in NYS are sole proprietorships and this would be an added cost and requirement imposed by the SIC (or SFI on an appeal) which has no benefit to the logger or company beyond what QLP has.</p> <p>In general, we do not believe there is anything inherently wrong with Certified Logging Programs (e.g. NE Master Logger). We recognize that there is value in holding individual logging company performance to higher standards. Our issue is with SFI/SIC recognition of them and their certified members, for all the reasons previously stated.</p>		
202	6.3	<p>Certified Logging Companies stand on their own merit, independent of SFI, by having all references to "Certified Logging Companies" and their endorsement removed from the SFI Standards and Rules.</p> <p>CLCs also carry their own costs to loggers who are already financially challenged in today's markets and operation environment. Requiring loggers to support a CLC while also expending resources on training that their employees need and benefit from is an unnecessary expense to be imposed by SFI of SICs.</p> <p>In the north east the only existing CLC is NE Master Logger. While the NY SIC does not object to Northeast Master Logger and their</p>		<p>Comment addressed by PM 3.1, PM 3.2, and definition of 'qualified logging professional' and 'certified logging professionals'. See SFI Section 14 - Definitions. See also SFI Section 7 Guidance - Use of Qualified Logging Professionals, Qualified Resources Professionals and Certified Logging Companies.</p>



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		<p>mission, we do not want to be in a position of requiring NY loggers or logging companies to be part of an independent organization. Already the vast majority of logger in NYS are sole proprietorships and this would be an added cost and requirement imposed by the SIC (or SFI on an appeal) which has no benefit to the logger or company beyond what QLP has.</p> <p>In general, we do not believe there is anything inherently wrong with Certified Logging Programs (e.g. NE Master Logger). We recognize that there is value in holding individual logging company performance to higher standards. Our issue is with SFI/SIC recognition of them and their certified members, for all the reasons previously stated.</p>		



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203	6.3	<p>SFI and SIC's should not accept SmartLogging certification without further review. The SmartLogging standard is not published, nor are summary reports of the entities that have received SmartLogging certification. SFI and SIC's should be able to review the SmartLogging standard in its entirety and the full SmartLogging audit reports for any entity claiming such certification. SFI should insist that the SmartLogging standard be published and open to public comment for revision and that public summary reports be published for each entity claiming such certification.</p> <p>SFI and SIC's should not accept any "Master Logger" certification program unless and until they have reviewed the program's standards in their entirety and the full audit reports for any entities claiming such certification. SFI and SIC's should insist that any "Master Logger" certification standards be published and open to public comment for revision and that public summary reports be published for each entity claiming such certification. SFI and SIC's should insist that "Master Logger" certification programs have at least one member of an audit team who is certified as an auditor by an accepted standard (e.g. ISO, ANAB).</p>		<p>Comment addressed by PM 3.1, PM 3.2, and definition of 'qualified logging professional' and 'certified logging professionals'. See SFI Section 14 - Definitions. See also SFI Section 7 Guidance - Use of Qualified Logging Professionals, Qualified Resources Professionals and Certified Logging Companies.</p>



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
204	6.3	Due to the absence of an organization in Canada wishing to have a Certified Logger (or Company) program, the Quebec SIC is of the opinion that Performance Measurement 6.3 has no added value for certified organization with Fiber Sourcing certification. The SIC believes that it is more relevant to focus efforts on training programs for wood producers. These programs are already well established, reach many workers and can be improved to make them more complete and reach a larger group.		Comment addressed by PM 3.1, PM 3.2, and definition of 'qualified logging professional' and 'certified logging professionals'. See SFI Section 14 - Definitions. See also SFI Section 7 Guidance - Use of Qualified Logging Professionals, Qualified Resources Professionals and Certified Logging Companies.
205	6.3	The Quebec SIC suggest that the Certified Logging Company qualification should be promote by SFI Inc to Land Owner Association, forestry school, or other forestry association. In the event of an association wishing to obtain this certification for its wood producers, the SIC could validate the content.		Comment addressed by PM 3.1, PM 3.2, and definition of 'qualified logging professional' and 'certified logging professionals'. See SFI Section 14 - Definitions. Also, see SFI Section 7 Guidance - Certified Logging Companies.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
206	6.3	<p>Despite the attempt to clarify the difference between QLP and CLP by changing CLP to CLC, this was clearly ineffective given all the chaos and confusion on the webinars (such as "is this CoC certification, is this required, is training required for members of a CLC, who will conduct the training, etc.). SFI missed the boat on creating meaningful value and differentiation within the standards and now any attempt to do so is likely to lead to additional confusion and complexity at a time when the marketplace and logging workforce is in no position to leverage or respond. (In some states, very strong, rigorous programs like MN Master Logger Program have dissolved due to the inability to create value.)</p> <p>Strongly recommend removal of CLC / CLP concept entirely from the standard and rules. If SFI Inc wants to provide recognition to Certified logging organizations/programs (aka Master Loggers) then SFI Inc. should do so via a mutual recognition MOU and do so at a national level and take on the responsibility of ensuring these programs are credible, well-managed to meet the SFI requirements, etc. This is not an appropriate role for SICs and stands to create unnecessary and damaging relationship/partnership impacts across the supply-chain which could have unintended consequences for SICs and member companies.</p>	<p>Ideal Option: Recommend removal of all references to "Certified Logging Companies" (and the former CLPs) and the endorsement process by SICs from the SFI Standards and Rules.</p> <p>Back-up Option: If CLC as a concept is left in due to political pressure or other reasons not clearly justified on the webinars, then efforts need to be taken to be VERY clear with verbiage to differentiate from the training aspect and status of INDIVIDUAL loggers vs. a certification program managed by an association/non-profit (aka Master Loggers). We are not really talking about a "certified logging company" which opens the door for understandable confusion and perceived reference to CoC certified loggers / companies ... which are in essence certificate holders.</p> <p>Need to decouple in ALL written and verbal statements</p>	<p>Comment addressed by PM 3.1, PM 3.2, and definition of 'qualified logging professional' and 'certified logging professionals'. See SFI Section 14 - Definitions. See also SFI Section 7 Guidance - Use of Qualified Logging Professionals, Qualified Resources Professionals and Certified Logging Companies.</p>





Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
		Support the points made by NY SIC and ME SIC. The burden and responsibility of recognizing and ensuring proper management and compliance with SFI standards is not an appropriate role for an SIC. SICs are not set-up to certify that a logger or logging program/association/company is complying with the SFI requirements, but rather that the training meets the SFI requirements. That should be the focus and requirement, period.	<p>the idea of training requirements/tracking relative to responsibilities of Certified Companies or “companies” in general. Certificate Holders (vs. “company”) are required to “stive to achieve” 100% use of QLP with at least one QLP on-site “regularly.” Every time we refer to “training being tracked by the ‘company’” or “conducted by the ‘company’” I think we create confusion and continue to muddy the waters. Suggest using the word "organization" vs "company."</p> <p>The purpose and benefits of the Certified Logging IRgabuzatuib concept has nothing to do with training but rather with a supposed higher degree of confidence that other SFI requirements are being implemented in operations. To be a member of a Certified Logging Organization you must AT A MINIMUM be a QLP. Period. That decouples it and puts the training and tracking</p>	



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
			responsibility off of the certified logging organization so that they can then focus on things such as auditing implementation of BMPs, tracking certified fiber (if they also have a CoC certificate), reduces risk to Certificate Holders (not “companies”) using a Certified Logging Organization due to the independent audits by the Certified Logging Organization, etc. SFI Inc. should be responsible for tracking and ensuring Certified Logging Organizations have a credible standard that aligns with SFI principles and that annual audits, corrective actions, and stakeholder/public complaints process is adhered to.	



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
207	6.3	Remove - delete. It is not the role of SICs to recognize and attest to the performance/management/credibility of CLCs now or in the future. This should be handled between SFI Inc and Master Loggers at a national/regional level if SFI and Masters Loggers mutually see benefit from recognition. SFI should clarify what the requirements are for Masters Logger programs to achieve recognition and SFI Inc. should assess, monitor and take on the work associated with this decision. This will avoid mass chaos/confusion/variability and the risk of damaging relationships within the very partners that need to be working together (companies, loggers, universities, etc.). It also jeopardizes the credibility and impartiality of the SICs and confuses the training vs. certification role. Support NY SIC comments and paper on this matter.	Delete reference to CLC in Indicator text and 6.1.6.c.	Edit addressed by PM 3.1 and PM 3.2. definition of 'certified logging professionals'. See SFI Section 14 - Definitions.
208	6.3	Reword for sentence structure and clarity of focus on certified logging companies.	Certified Organizations shall work individually or collaboratively with SFI Implementation Committees, logging or forestry associations, appropriate agencies, or others in the forestry community to foster improvement in the professionalism of certified logging companies where they exist.	Edit addressed by PM 3.1 and PM 3.2. definition of 'certified logging professionals'. See SFI Section 14 - Definitions.



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209	6.3	Currently, in New Hampshire the New Hampshire Professional Loggers Program establishes its own standards for “certification”. The NH SIC reviews the training criteria and provides input to insure this program satisfies the SFI Standard. It is important for SFI to recognize that in many cases wood producer training programs are independent organizations not overseen or run by the SIC. These programs establish their own “membership” criteria and curriculum. The SICs work cooperatively with these programs in a supportive role providing input into the curriculum and in many cases financial support. The relationship between the SICs and the state wood producer training program is mutually beneficial, and fosters continual improvement for the training and SFI programs. The NH SIC and its members recognize and see the benefits of training and work to encourage broad participation in training programs by wood producers, foresters, and landowners. The NH SIC believes it is beyond the scope of a state SIC to develop criteria for Certified Logging Company Programs as identified in performance measures 6.3 and inconsistent with the SIC’s mission. “Developing criteria”, when applied to a 3 <sup>rd</sup> -party audited program are complicated and difficult. This is evidenced in Objective 12 within Section 7 (Guidance to SFI Standard and Rules) which establishes a detailed review, approval and appeal process for an organization	The NH SIC proposes either SFI, Inc. does the criteria review and establishment, or the organization seeking the approval of their Certified Logging Company Program hires an impartial, third-part auditor. The second scenario is consistent with the Group Certification Organizations process identified in Section 10 (Audit Procedures and Auditor Qualifications and Accreditation). In this circumstance an organization seeking approval of their Certified Logging Company Program would be the “group”. They would enlisting a third-party, independent auditor to evaluate how their certification and audit program satisfies the criteria of performance measure 12.3 in Section 2 (Forest Management Standard) and performance measure 6.3. in Section 3 (Fiber Sourcing Standard).	Comment addressed by PM 3.1, PM 3.2, and definition of 'qualified logging professional' and 'certified logging professionals'. See SFI Section 14 - Definitions. See also SFI Section 7 Guidance - Use of Qualified Logging Professionals, Qualified Resources Professionals and Certified Logging Companies.



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		<p>seeing approval of a Certified Logging Company Program. This same section of the standard also defines the SFI Implementation Committee vision, core mission, and secondary mission. Consistently throughout this are training/education, outreach, promotion, research, and integrity/inconsistent practices. Not on this list is the review and establishment of criteria to evaluate another certification program's audit and compliance processes (in this case a logger certification program). In addition to being beyond the scope of the SICs, there are two mechanical problems with this proposal. First is this process does not contemplate a regional (multi-state) certification program. It would be inappropriate and burdensome to ask a regional Certified Logging Company Program to seek approval from each individual state their clients work in. In New England it is common for logging companies to work in as many as 4 states. State-specific approval also invites the confusion that could arise if one state were to approve a Certified Logging Company Program while another does not. Secondly, there is an inherent conflict of interest with this process. It is inappropriate ask wood buyers and land managers on a SIC review and approve a Certified Logging Company Program's proposal endorsed by that state's logging community.</p>		



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210	6.3	<p>Certified Logging Companies stand on their own merit, independent of SFI. New York's logger training efforts pre-date SFI and have always been built on training of the individual in:</p> <ol style="list-style-type: none"> <li>1. First, and foremost safety - particularly first aid, Cardiopulmonary Resuscitation (CPR) and chain saw safety. All in-person and hands on.</li> <li>2. Best Management Practices – as required by law (i.e. Water Quality BMPs),</li> <li>3. Basic forest ecology and silviculture practices that impact forest ecology.</li> <li>4. Continuing education of at least 3 credit hours every three years in areas that develop both business, ecological, safety and silvicultural practices which build professionalism in loggers.</li> </ol> <p>We Agree that fiber and timber should be delivered by a trained harvesting professional, however endorsement of Certified Logging Companies is vastly different than Qualified Logging Professional. We feel the Qualified Logging Professional maintains standards and safety. Requiring Companies an additional level of certification will put tremendous financial burden on an already burdened sector.</p>		Comment addressed by PM 3.1, PM 3.2, and definition of 'qualified logging professional' and 'certified logging professionals'. See SFI Section 14 - Definitions. See also SFI Section 7 Guidance - Use of Qualified Logging Professionals, Qualified Resources Professionals and Certified Logging Companies.
211	6.3	Le terme «bûcheron» n'est plus vraiment utilisé dans le langage forestier d'aujourd'hui. Il faudrait le remplacer par autre chose.	«L'organisation certifiée doit travailler, seule ou avec les comités de mise en oeuvre des normes SFI , les syndicats de bûcherons producteurs de bois...»	Edit addressed with PM 3.1. and PM 3.2.



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212	6.3	I am a family forest owner that owns several thousand acres. When contemplating harvesting activities, I rely on the expertise of licensed professional foresters often associated with the SIC or an SFI program participant. The SIC promotes sound forest practices through its educational efforts. Experience has shown me that it is not critical to pick a contractor that is a Master Logger. Most loggers have developed reasonable harvesting practices through SIC related training. I also rely on the SIC to be the arbitrator on the harvester's practices if the results are not meeting my expectations or that of my forester. To me it is critical that there is separation between the SFI Standards and the timber harvesting contractors. There must remain an independent oversight of the work the contractors do. It cannot be assumed that Master Loggers are going to follow the standards set by SFI without independent oversight. If the SFI standards provides a means to recognize an independent logging performance standard, SFI potentially loses the ability to provide oversight and risks its credibility.	The recondition of Certified Logging Companies (CLCs) has, in my opinion, the potential to jeopardize the credibility of SFI. If a CLC's performance on the ground doesn't match their program's promotions, SFI could be complicit by its indorsement.	Comment addressed by PM 3.1, PM 3.2, and definition of 'qualified logging professional' and 'certified logging professionals'. See SFI Section 14 - Definitions. See also SFI Section 7 Guidance - Use of Qualified Logging Professionals, Qualified Resources Professionals and Certified Logging Companies.



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213	6.3	I appreciate SFI looking to increase recognition of my Certified Master Logger Company. I think this is where things were headed when Time Inc preferred my wood. I don't know why it went away but I glad you are considering this.		Comment addressed by PM 3.1, PM 3.2, and definition of 'qualified logging professional' and 'certified logging professionals'. See SFI Section 14 - Definitions. See also SFI Section 7 Guidance - Use of Qualified Logging Professionals, Qualified Resources Professionals and Certified Logging Companies.
214	6.3	Any increased recognition of CLC's is good. I think there are other ways as to recognize that will also benefit SFI and its CO's.		Comment addressed by PM 3.1, PM 3.2, and definition of 'qualified logging professional' and 'certified logging professionals'. See SFI Section 14 - Definitions. See also SFI Section 7 Guidance - Use of Qualified Logging Professionals, Qualified Resources Professionals and Certified Logging Companies.
215	6.3	Rewarding CO's that use CLCs by allowing them to be audited against a reduced set of objectives would be great. It would also benefit my certified logging company and provide credit		Comment addressed by PM 3.1, PM 3.2, and definition of 'qualified logging professional' and





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		for the work that I do that already is meeting the SFI FS standard.		'certified logging professionals'. See SFI Section 14 - Definitions. See also SFI Section 7 Guidance - Use of Qualified Logging Professionals, Qualified Resources Professionals and Certified Logging Companies.
216	6.3	As a certified logging company, I have been supplying wood to many SFI mills throughout the years. They used to prefer my CLC wood but now that just want proof of training. MY CLC already is proof of training and it has a in-the forest verification of my practices. Seems like CLC's would be preferred.		Comment addressed by PM 3.1, PM 3.2, and definition of 'qualified logging professional' and 'certified logging professionals'. See SFI Section 14 - Definitions. See also SFI Section 7 Guidance - Use of Qualified Logging Professionals, Qualified Resources Professionals and Certified Logging Companies.
217	6.3	Is it possible for SFI to recognize CLCs and in return, allow the CO or mill to reduce the number of objectives that it is audited against? This would be a win-win for both CLC program standard and the CO that choose to go that route.		Comment addressed by SFI Section 7 Guidance - Certified Logging Companies.



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194	6.3	It has already been a problem to assure that a company has a trained individual on site. How is sub-contracting dealt with related to training requirements? And how does the change provide clarity that someone who is trained is actually on site?		Comment addressed by SFI Section 7 Guidance - Certified Logging Companies.
232	6.3	Regarding on site responsibilities for trained loggers, was there any discussion on including safety as one of those risks to be considered with others listed?		Comment addressed with PM 6.2.
233	6.3.1	Having criteria for SFI recognized training at the SIC level introduces potential of inconsistency from state/province to state/province and may not fully capture the collective knowledge and experience of the SFI network. Consider establishing criteria at the level of the SFI Standard.	Delete "... establish criteria and ..." and then add to the end after "that address the following minimum criteria for SFI endorsed core training programs". Then make sure the list is comprehensive and can be used consistently throughout the SFI network to recognize core training programs. For example, consider adding back in the four topics moved to continuing education, and add "compliance with all applicable laws and regulations" or similar text.	Comment addressed by PM 3.1, PM 3.2, and definition of 'qualified logging professional' and 'certified logging professionals'. See SFI Section 14 - Definitions. See also SFI Section 7 Guidance - Use of Qualified Logging Professionals, Qualified Resources Professionals and Certified Logging Companies.
234	6.3.1.a	Should this be "by key personnel"?		Comment addressed by definition of 'certified logging professionals'.



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				See SFI Section 14 - Definitions.
235	6.3.1.a.	Reword to clarify intent of new wording, "or key personnel".	a. completion of SFI Implementation Committee recognized logger training programs and meeting continuing education requirements of the training program by key personnel;	Edit addressed by PM 6.2.
237	6.3.1 b	<p>SFI language proposes "in-the-forest verification of conformance with the logger certification programs" -- "programs" in the plural, which would encompass, we believe, both the "Qualified Logging Professional" designation and the "Certified Logging Professional" designation.</p> <p>In past years, Associated California Loggers has been told that a "third party audit" is required to obtain "Certified Logging Professional" status, and that without a "third party audit," the certification level drops down to "Qualified Logging Professional."</p> <p>We believe that in lieu of a "third party audit," proof of state, federal, and local licensure, permitting and inspection requirements and oversight of both landowners and government agencies, should satisfy both such third party audit requirements and verification of conformance with logger certification programs.</p>	Independent in-the-forest verification of conformance with the logger certification programs. Independent in-the-forest verification is not necessary in states like California where licensing of loggers exists as well as extensive oversight by foresters representing the landowner and foresters representing government agencies.	Comment addressed by PM 3.1, PM 3.2, and definition of 'qualified logging professional' and 'certified logging professionals'. See SFI Section 14 - Definitions. See also SFI Section 7 Guidance - Use of Qualified Logging Professionals, Qualified Resources Professionals and Certified Logging Companies.



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		In California, such requirements include the LTO (Licensed Timber Operator) license, permits required by water, air and forestry agencies at the state and federal level, and local permits...many of which involve inspection in the woods to prove compliance.		
236	6.3.1 b. & i.	Independent in the forest verification is not necessary in states like CA where licensing of loggers exists as well as extensive oversight by foresters representing the landowner and foresters representing government agencies. The edits we suggest will allow the CA SIC to develop a framework for the creation of a financially feasible process for wood producers in the state to become certified logging companies.	Delete the phrase "independent in-the-forest"	Comment addressed with PM 3.1 and definition of Certified Logging Company - see SFI Section 14 - Definitions.
238	6.3.1 i	Consider moving 6.3 1 (i) content into it's own objective number (i.e., 6.3 2.) as I believe you intend this requirement to apply to all Certified Organisations, not just to Recognition of Certified Logging Programs, where they exist. Locating it within objective 1, seems to imply it only applies to logging certification programs criteria.	Move 6.3, 1. (i) to a new objective 6.3.2	Comment addressed by PM 6.2 and definition of 'qualified logging professional' and 'certified logging professionals'. See SFI Section 14 - Definitions. See also SFI Section 7 Guidance - Use of Qualified Logging Professionals, Qualified Resources Professionals and Certified Logging Companies.



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240	6.3.1 i	" i) independant verification that each crew has..."	This point could be hard to demonstrate.	Comment addressed by definition of 'certified logging professionals'. See SFI Section 14 - Definitions.
239	6.3.1 i.	We believe the standard should better define this section as far as owner, employee and the "On-site" requirement. Todays, logging contractors are very efficient, operating with few employees per side and rarely have anyone who functions strictly as a crew boss. More often they would be an equipment operator. Operationally, the language for this performance measure needs to provide more latitude than what appears to be a requirement for on-site presence at all times.		Comment addressed by PM 3.1, PM 3.2, and definition of 'qualified logging professional' and 'certified logging professionals'. See SFI Section 14 - Definitions. See also SFI Section 7 Guidance - Expectations for On-site Supervision by Qualified Logging Professionals.
241	6.3.1 i.	We believe the standard should better define this section as far as owner, employee and the "On-site" requirement. Todays, logging contractors are very efficient, operating with few employees per side and rarely have anyone who functions strictly as a crew boss. More often they would be an equipment operator. Operationally, the language for this performance measure needs to provide more latitude.		Comment addressed by PM 3.1, PM 3.2, and definition of 'qualified logging professional' and 'certified logging professionals'. See SFI Section 14 - Definitions. See also SFI Section 7 Guidance - Expectations for On-site Supervision by Qualified Logging Professionals.



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128	6.1 & 12.1	BMPs need to be included in both Core and Continuing Ed. BMPs need continued attention on a regular basis to keep everyone on the same page. I also agree with the idea that not only loggers should be included in the the training, and professionals such as foresters and site prep contractors also need core/continued educations, especially on BMPs.		Comment addressed by PM 6.2.
130	6.1 & 6.2	Very specific continuing education and core curricula requirements for loggers. Nothing addressed for foresters or resource managers. While I recognize that most foresters/managers have an advanced degree of some sort, we get a lot of feedback from loggers and landowners that loggers are more aware of the BMPs (Forest Management Guidelines in MN) and their application on sites than are foresters. Additionally, resource professionals should have a continuing education requirement in this standard as well. Leaving it as trained to fulfil their duties could be their degree alone. Continuing education should be a goal for everyone to stay current with changing research, applications, etc. While many managers are involved with other groups that require CE, this standard can recognize those efforts without duplication. However, a standard that does not require updating your knowledge and understanding is a bit odd.		Comment addressed by PM 6.1 and PM 6.2.



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118	6.1 & 6.2	SIC's will continue to manage the logger training programs, both internal and external , (have oversight), will maintain individual(s) trained databases and will now include a database of trained logging companies, right?		Comment addressed by PM 6.2.
119	6.1 & 6.2	Is there an expectation that the QLP will share their training the the crew they are participating on?		That would be a good practice. Not sure why a QLP would not share the training / knowledge he/she has acquired.
120	6.1 & 6.2	I appreciate the efforts put to leaving specifics to the SICs. Organizations holding FM/FS certificates can choose to have requirements above and beyond the standard however there is no need for everyone to be audited to a standard that fits the needs of a small subset of certificate holders		Noted.
129	6.1 & 6.2	Core vs continuing education: logging safety appears in both places and BMPs do not. Suggest putting BMPs in both places and keeping logging safety in continuing ed only since OSHA is in the core section.		Comment addressed by PM 6.2.
121	6.1 & 6.2 / 12.1 & 12.2	Who will be auditing the SIC training programs?		SIC approved programs can be audited at the Certified Organizations level or at the SIC level. Certification Bodies can determine how they wish to do it.



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122	6.1 & 6.2 / 12.1 & 12.2	In regards to multiple QLP programs within a given state I can see an issue with tracking who is qualified and CE credits in maintaining a data base that allows SFI Participants to verify QLP status. Is there a way for an organization to develop a program outside of the SIC and get recognized by SFI Inc?		Comment addressed by SFI Section 7 Guidance - Certified Logging Companies. Individual Certified Organizations can choose to work with CLCs. Not an SIC responsibility to recognize CLCs.
123	6.1 & 6.2 (12.1 & 12.2)	Add to the standard that the list is not inclusive for training or outside credit options that do not reflect that list are not likely to be approved.		Comment address by PM 6.2.
124	6.1 & 6.2 (12.1 & 12.2)	Comment on SIC approval of training topics for the core and continuing education requirements. Should we clarify the PM text to make that more apparent?		Comment address by PM 6.2.
125	6.1 & 6.2 (12.1 & 12.2)	Not every state or province has the same laws or BMPs requirements, so even if they are certified in another location, does not mean they have adequate knowledge for another state. I agree the certification should be recognized, but possibly should include a training requirement on local laws and BMPs.		Comment address by PM 6.2.
126	6.1 & 6.2 (12.1 & 12.2)	The real issue is how do you track who is qualified? Need a central data base that tracks qualifications. Adding in multiple programs becomes unmanageable. SFI Inc is adding an option to review the program and it appears to go around the SIC.		Comment addressed by PM 3.1, PM 3.2, and definition of 'qualified logging professional' and 'certified logging professionals'. See SFI Section 14 - Definitions. See also SFI Section 7 Guidance - Use of





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				Qualified Logging Professionals, Qualified Resources Professionals and Certified Logging Companies.
<b>131</b>	6.1 & 12.1	Invasive species should be added to list of Core topics for logger training.		Comment address by PM 6.2.
<b>117</b>	6.1 (12.1)	Are the core trainings shown in this presentation going to be the required core trainings after 2022 or do state SIC's determine the cores? Some states now have Invasive species and BMP's for water quality as their cores.		Comment address by PM 6.2.
<b>167</b>	6.2 / 12.2	As a CO, do we track the company or the individual on site or both to be compliant?		Comment addressed by PM 3.1, PM 3.2, and definition of 'qualified logging professional' and 'certified logging professionals'. See SFI Section 14 - Definitions. See also SFI Section 7 Guidance - Expectations for On-site Supervision by Qualified Logging Professionals.
<b>168</b>	6.2 / 12.2	Best Management Practices training should be required in both CLE and the initial training.	,best management practices, reforestation, invasive species, forest resource conservation, aesthetics and special sites;	Edit addressed by PM 6.2.



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169	6.2 & 6.3	It seems the CO's would be better off if they could choose there own way to meet 6.2 or 6.3. Having the SIC part of the Obj. indicators of 6.2 and 6.3 create a hard time for auditors.		Comment addressed by SFI Section 7 Guidance - Certified Logging Companies. Individual Certified Organizations can choose to work with CLCs. Not an SIC responsibility to recognize CLCs.
170	6.2 & 12.2	I would also add or specify Timber species management as a CE topic (species specific training options - aspen, N. Hwd, pine, etc.) Not just sustainable forestry, but species.		Comment address by PM 6.2.
171	6.2 & 6.3	Will the audit process reflect verification that loggers are actually meeting the sic training standard vs the forester saying they are. As training organization I rarely hear from auditors. Once in the 6 years I've been here.		Comment is addressing CB auditing technique. Requirement is that the training status is verified.
173	6.2 and 6.3	Why is this indicator applied to the SIC's. Wouldn't it be more effective if it was up to the individual CO? IS the company responsible if SIC does not meet the requirements?	Drop all specific requirements that apply only to SIC's. Continue to require SIC support (via PM 7.1). Add SIC indicators through a separate SIC auditing protocol.	Comment address by PM 6.2.
172	6.2 and 6.3	These indicators are very specific details about training content. It would be difficult to audit the certified organization for SIC training content. The majority of these indicator details should be removed and placed into a guidance document for SIC's on training.	Proposed language is to simplify to only Indicator 1: participation or support of SFI Implementation Committees to establish logger training.	Comment address by PM 6.2.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
174	6.2, 6.3	This collection of indicators effectively applies performance requirements on SIC's rather than on Certified Organizations. This approach has always been extremely difficult to audit effectively. When/if an SIC fails to conform to one of these indicators, auditors are forced to raise NC's against individual members. Inevitably this becomes disconnected, confusing, and very inefficient.	Drop all specific requirements that apply only SIC's. Continue to require SIC support (via PM 7.1). Add SIC indicators through a separate SIC auditing protocol.	Comment address by PM 6.2.
218	6.3 (12.3)	In Fiber Sourcing. If there is a challenge to an SIC decision on logger training, where is the issue addressed at SFI?		Comment addressed by SFI Section 7 Guidance - Certified Logging Companies. Individual Certified Organizations can choose to work with CLCs. Not an SIC responsibility to recognize CLCs.
219	6.3 (12.3)	How will the standards assure that a certified logging company has a trained individual on site? The proposed change that the company has to manage those qualifications could make it difficult for a certified organization to monitor whether trained individual(s) are appropriately on site. This seems like a step backwards.		Comment addressed by SFI Section 7 Guidance - Certified Logging Companies. Individual Certified Organizations can choose to work with CLCs. Not an SIC responsibility to recognize CLCs.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
220	6.3 (12.3)	<p>Keystone Wood Products Association, (KWPA) is one of Pennsylvania's three hardwood utilization groups (HUG's), which serves on the State's Hardwood Development Council. Serving Central Pennsylvania, KWPA promotes the industry via workforce development, education and public events. KWPA strongly supports the State Implementation Committee of SFI, which is led by Program Manager, Chuck Coup. KWPA is opposed to SFI recognizing certified logging programs because:</p> <ol style="list-style-type: none"> <li>1. Certified logging programs may not be guided by the same philosophies of education, training and safety that the Pennsylvania State Implementation Committee values. It is unfair to attach credibility to certified logging programs to the State Implementation Committee of SFI.</li> <li>2. It is unlikely that certified logging programs would allow guidance or standards from the State Implementation Committee or provide financial support to ensure that certified logging standards are met.</li> <li>3. Most certified logging programs are course quantified. In contrast, SFI training, combines courses along with hands on training. In addition, it is also ongoing training that is offered during a logger's career. Participation reflects the personal motivation and professionalism of the participants.</li> <li>4. Master Loggers may be viewed as more professional or safer than those trained by the SFI, yet the public may assume that they are.</li> </ol>		<p>Comment addressed by PM 3.1, PM 3.2, and definition of 'qualified logging professional' and 'certified logging professionals'. See SFI Section 14 - Definitions. See also SFI Section 7 Guidance - Use of Qualified Logging Professionals, Qualified Resources Professionals and Certified Logging Companies.</p>



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
		This adds unnecessary confusion to those seeking the service of loggers. 5. Pennsylvania's Hardwood Development Council (HDC) publishes an annual list of trained loggers in the Commonwealth. The HDC deems it unfair to include certified logging companies in the directory when the requirements are not necessarily equivalent. 6. Based on experience and confusion in other states, Pennsylvania prefers to only promote the SFI Qualified Logger Program.		
<b>221</b>	6.3 (12.3)	Regarding PM 12.3 Ind. 1.i.1 Suggest removing the entity identification (SFI Implementation Committee) from this sub-indicator because not all Certification Organizations have an SIC. By removing "SIC" would be consistent with how the PMs are structured; i.e. "Certified Organizations shall work individually and/or with SFI Implementation Committees...". Possible rewording: "1. has completed an approved wood producer training program,"		All Certified Organizations that are Fiber Sourcing Standard certified are required to be a member of an SIC.
<b>222</b>	6.3 (12.3)	With a company now being certified rather than individuals, how will we know who is certified for on site oversight and how will be document that for audits?		Comment addressed by PM 3.1, PM 3.2, and definition of 'qualified logging professional' and 'certified logging professionals'. See SFI Section 14 - Definitions. See also SFI Section 7 Guidance - Use of Qualified Logging



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				Professionals, Qualified Resources Professionals and Certified Logging Companies.
<b>223</b>	6.3 (12.3)	Does SFI expect that recognition and documentation of a CLC in one state will be recognized by all SIC's?		Comment addressed by SFI Section 7 Guidance - Certified Logging Companies. Individual Certified Organizations can choose to work with CLCs. Not an SIC responsibility to recognize CLCs.
<b>224</b>	6.3 (12.3)	How much emphasis has the independent forest verification for Master Loggers or CLCs had on the implementing the FS draft standard?		Representatives of certified logging programs were on the Fiber Sourcing Task Group.
<b>225</b>	6.3 (12.3)	Did I understand correctly the explanation on the possibility of a logger training or certification program going around the state SIC to be approved at the national level? If correct, doesn't this undermine the State SIC? Perhaps I misunderstood what I heard.		Comment addressed by PM 3.1, PM 3.2, and definition of 'qualified logging professional' and 'certified logging professionals'. See SFI Section 14 - Definitions. See also SFI Section 7 Guidance - Use of Qualified Logging Professionals, Qualified Resources Professionals and Certified Logging Companies.



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226	6.3 (12.3)	It seems that SICs will spend large amounts of time attempting to determine if 6.1,2, and etc are met. Should the burden of proof be placed at the feet of the non SIC training programs?		Comment addressed by PM 3.1, PM 3.2, and definition of 'qualified logging professional' and 'certified logging professionals'. See SFI Section 14 - Definitions. See also SFI Section 7 Guidance - Use of Qualified Logging Professionals, Qualified Resources Professionals and Certified Logging Companies.
227	6.3 (12.3)	CLC's require third party verification of on the ground performance. How does SFI verify if loggers actually attend training or if they just pay a bi-annual fee to get their name on a list? Further, how does training equate to verification of on the ground performance if anyone can take a training program?		Comment addressed by SFI Section 7 Guidance - Certified Logging Companies. Individual Certified Organizations can choose to work with CLCs. Not an SIC responsibility to recognize CLCs.
228	6.3 (12.3)	Some SICs do not have certified training program requirements, how will this be managed? Will those SICs be required to develop/endorse certified programs?		Comment addressed by PM 3.1, PM 3.2, and definition of 'qualified logging professional' and 'certified logging professionals'. See SFI Section 14 - Definitions. See also SFI Section 7 Guidance - Use of



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				Qualified Logging Professionals, Qualified Resources Professionals and Certified Logging Companies.
<b>229</b>	6.3 (12.3)	With a Certified Logging Company are we de-personalizing the individual who was the Certified Logging Professional.		Comment addressed by PM 3.1, PM 3.2, and definition of 'qualified logging professional' and 'certified logging professionals'. See SFI Section 14 - Definitions. See also SFI Section 7 Guidance - Use of Qualified Logging Professionals, Qualified Resources Professionals and Certified Logging Companies.
<b>230</b>	6.3 (12.3)	Where CLC programs may span multiple states, would the approval by one state require approval from other states within that CLC's program's footprint?		Comment addressed by SFI Section 7 Guidance - Certified Logging Companies. Individual Certified Organizations can choose to work with CLCs. Not an SIC responsibility to recognize CLCs.





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231	6.3 (12.3)	<p>These indicators potentially create a dynamic contrary to the mission of the SIC's. SIC's are most successful in promoting the tenants of SFI when working with partners. These partnerships have often been cultivated from years of relationship building. Indicators 6.3 FS and 12.3 FM put SIC's in control of approving and ultimately endorsing performance based programs which could belong to one of our closest partners, the loggers. If not approved the relationship can be strained. In recognition of that potential, SFI Inc. has established an appellate process which confirms the risk of conflict at the SIC level. So why is this different from approving a training program? When SIC's approve a training program they are approving course content and frequency of training. By virtue of approving a logger training program, SIC's take on no responsibility for individual logger's or logging company's performance. Certified logging companies, CLCs are often promoting their services on a performance basis. If SIC's endorse a CLC program, SFI by extension is essentially putting a stamp of approval behind that of the CLCs promotions. SIC's shouldn't have that burden or responsibility. The SICs would have no choice but to be very conservative in their evaluations of CLCs and would likely not have the resources necessary to determine on the ground performance of the criteria listed under both 6.3 and 12.3 respectively.</p>		<p>Comment addressed by PM 3.1, PM 3.2, and definition of 'qualified logging professional' and 'certified logging professionals'. See SFI Section 14 - Definitions. See also SFI Section 7 Guidance - Use of Qualified Logging Professionals, Qualified Resources Professionals and Certified Logging Companies.</p>



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		SFI should move the CLC related language out of the standards associated with education at the very least. SFI should consider establishing a national level process to evaluate performance based programs such as the Master Logger program, a prime candidate for CLC recognition. Just think of the issues that would have been created when SFI recognized Tree Farm if it had been attempted state by state. This process is problematic from a constancy perspective as well as working against the intention of SIC being promoters of collaboration. Should SFI establish a national process, SIC could become advocates to help CLCs get recognized instead of playing the role of gate keeper. In addition, SFI nationally would have the sole control of how it allows its credibility to be leveraged, which would be more appropriate than the current approach.		
242	7.1	Specifies that organizations should support and promote efforts by other groups, but does not indicate any activities to provide education or outreach for those groups. This would be a good place to include SFI outreach to consulting foresters specifically.	Change support and promote to cooperate with	Edit considered but not accepted as it does not improve the requirement.



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243	7.1.2	This section itemizes topics to be included in outreach to forest landowners, but does not include awareness of SFI or Inconsistent Practices. All information for family forest landowners from all sections of the Standards should be included here for reference. Other topics to include: use of qualified logging professionals, promotion of certification, and reporting of inconsistent practices.	Include additional topics for landowner outreach: awareness of SFI, use of qualified logging professionals, promotion of certification, and reporting of inconsistent practices.	Edit addressed with Ind. 7.1.2.
244	7.1.2	It would be best to have a "complete" list of topics for forest landowners (and public) in this Indicator. Other requirements mention topics to promote/encourage landowners and public, but are not currently included in this list. For example: PM 3.1. - "encourage landowners to utilize the services of qualified logging professionals, certified logging companies (where available), qualified resource professionals	2. Support individually or collaboratively education and outreach to forest landowners describing the importance of and providing implementation guidance on: a. best management practices ; b. reforestation and afforestation; c. visual quality management ; d. conservation objectives , such as of critical wildlife habitat elements, biodiversity, threatened and endangered species, and Forests with Exceptional Conservation Value ; e. management of harvest residue (e.g., slash, limbs, tops) considers economic, social, environmental factors (e.g.,	Edit addressed with Ind. 7.1.2.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
			organic and nutrient value to future forests) and other utilization needs; f. control of invasive species exotic plants and animals ; g. characteristics of special sites ; h. reduction of wildfire risk ; and i. using qualified logging professionals, certified logging companies (where available), and qualified resource professionals.	
245	7.1.2 d	In Canada, critical habitat has a specific definition under the species at risk act and is defined in recovery strategies.	Clarify if the intent is to use the narrow definition from the recovery strategy, or is the reference to something broader	Edit addressed with Ind. 7.1.2 d.
246	7.2.1	"Periodic educational opportunities promoting sustainable forestry, such as: a. Project Learning Tree;.." In the province of Quebec there is a network of regional forestry associations whose mandate is forest education, especially to student.	Suggest: " such as: a. Project Learning Tree or other programs by Forestry Associations;"	Edit addressed with Ind. 7.2.1 f.
247	7.3	Requires establishing procedures to address concerns about inconsistent practices but does not include promotion or dissemination of those procedures.	Inconsistent Practices reporting should be included in both landowner outreach and wood producer training.	Edit considered but the Task Group decided to address reporting of inconsistent practices with PM 7.3.



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248	8.1	This section refers to organizations with forest management responsibilities on public lands. This section should be limited to fiber sourcing from public lands, and management responsibilities better addressed in the Forest Management Standard. Should require participation in processes rather than developing processes.	Change forest management responsibilities to fiber sourcing. Delete "development of".	Edit considered but not accepted as it does not improve the requirement.
249	9.1.1	The minimum content of a summary audit report posted for public review raises antitrust considerations with details on land and fiber procurement operations and business contacts for audits.		Noted. Task Group considered the comment but decided to leave the requirement in place.
250	10	Support deletion of these and addition of the new DDS objective / requirements	NA	Comment considered but not accepted as it does not improve the requirement.
251	10	Does not refer to an internal audit, that may be the intent but it speaks of review, not audit. And the multisite approach in Section 10 speaks to internal audit. This all needs to connect.		Comment addressed with Indicators 10.1.1 and 10.1.2. Internal audit is just one way to assess the performance of the Fiber Sourcing system. Also, SFI Section 10 which is a normative document to the Fiber Sourcing Standard cites ISO 19011 (Guidelines for auditing management systems) as a source for Certified



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
				Organizations seeking internal audit guidance.
252	10	We note the new requirements for a Due Diligence System to avoid controversial sources in the Fiber Sourcing Standard (and replicated in the Certified Sourcing and Chain of Custody Standards), but we believe they are inadequate. One fundamental weakness is that there is no objective requirements or guidance on risk assessment and mitigation. Rather, each individual company is able to independently assess and determine risk and decide how to manage high risk material. This creates an inherent conflict of interest that undermines the prospects for positive outcomes.		Comment addressed with PM 11.2 which allows the risk assessment to be done at the regional level using SFI Implementation Committees.
253	11	Once again an overly complicated and paperwork intensive process for a relatively low risk activity in the North American region. Current Objectives, PM's and Indicators do a good job of minimizing risk without having to completely re-do a program that is working just fine. More busy work for your program participants with no tangible benefit to suppliers or customers.		Comment considered but not accepted as it does not improve the requirement.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
254	11	Objective 11. Avoid Controversial Sources. This whole section along with its Performance Measures and Indicators concern us. Going back to our 19,000 square mile sourcing area, how are we supposed to collect information through a due diligence system on logs from such a large area? Controversial Sourcing is just not an issue in our sourcing area. We require a Hazard Reduction Agreement (HRA) from the Montana Department of Natural Resources (DNRC) that tracks the landowner, location, volume from each HRA. The DNRC also tracks SMZ/BMP violations and forwards that information to the log purchasers. They also track any violations in the Hazard Reduction after harvest. In our Log Purchase Agreements with the log seller, it states that they have clear title to sell the logs. This section is two pages long for something that is not an issue in our sourcing area. We suggest giving more leeway to the local SIC to determine to what extent Certified Organizations need to address Controversial Sources.		Comment addressed with PM 11.2 which allows the risk assessment to be done at the regional level using SFI Implementation Committees.
256	11	Support - good strengthening and addition. Encourage SFI to seek PEFC endorsement.		Noted.
257	11	Eliminate this Objective entirely or exempt sourcing from within the United States and Canada as under the current Standard. In the Guidance Section it states that the US and Canada already have a "strong legal framework which Certified Organizations must abide by" so why is it necessary to add in this Objective if the		Comment considered but not accepted as it does not improve the requirement.



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		framework already exists to avoid Controversial Sources. This is a major redundancy that adds nothing to the Standard.		
258	11	This whole section along with its Performance Measures and Indicators is of concern. Referencing our fiber sourcing area, Controversial Sourcing is just not an issue. We require a Hazard Reduction Agreement (HRA) from the Montana Department of Natural Resources (DNRC) that tracks the landowner, location, volume from each HRA. The DNRC also tracks SMZ/BMP violations and forwards that information to the log purchasers. They also track any violations in the Hazard Reduction after harvest. The Log Purchase Agreements with the log seller states that they have clear title to sell the logs. This section is two pages long for something that is not an issue in our sourcing area. We suggest giving more leeway to the local SIC to determine to what extent Certified Organizations need to address Controversial Sources.		Comment considered but not accepted as it does not improve the requirement.
255	11	The introduction of the objectif could benefit with the addition of the category of material that could be controversial	Suggest: "To manage the risk of sourcing fiber from controversial sources, which are: a. Forest activities which are not in compliance with applicable state, provincial, federal, or international laws. b. Forest activities which are contributing to regional	Edit addressed with Objective 11 and addition of definition.





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			<p>declines in habitat c.</p> <p>Conversion sources originating from regions experiencing forest area decline.</p> <p>d. Forest activities where the spirit of the ILO Declaration on Fundamental Principles and Rights at work (1998) are not met.</p> <p>e. Forest activities where the spirit of the United Nations Declaration on the Rights of Indigenous Peoples (2007) are not met.</p> <p>f. Fiber sourced from areas without effective social laws</p> <p>g. Illegal Logging including trade in CITES (The Convention on International Trade in Endangered Species of Wild Fauna and Flora) listed species.</p> <p>h. Conflict Timber.</p> <p>i. Genetically modified trees via forest tree biotechnology. "</p>	
260	11.1.1	The United States and Canada have robust legal frameworks information collection regarding the sources of procured fiber. The Idaho SIC requests retention of the exemption of information collection from fiber sourcing within the United States and Canada.		Comment considered but not accepted as it does not improve the requirement.



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261	11.1.1	Prévoir une adaptation pour les petites forêts privées puisque le peuplement exact où la récolte a eu lieu est inconnu. Il est important de simplifier cet indicateur, autrement il sera impossible à rencontrer.	Indicateur : 2. L'organisation certifiée peut considérer la fibre comme étant à faible risque et ne justifiant aucune autre mesure de diligence raisonnable si : [...] f. la fibre provient d'un producteur de bois dont la zone de récolte est couverte par des règlements locaux concernant la protection du couvert forestier.	Edit addressed with Indicator 11.1.2.
262	11.1.1	Meaning of controversial sources	Add a reference to SFI's definition of controversial sources in Section 14	Definition is now included in the Objective 11 text.
259	11.1.1 a	More than one common name could be used to designate the same scientific name	To avoid confusion, use scientific names (or both common and scientific names)	Comment considered but not accepted as it does not improve the requirement.
264	11.4	Requires mitigating the risk of risk	"...mitigate the risk of controversial sourcing in high risk areas."	Edit considered but not accepted as it does not improve the requirement.
265	11.4	This entire section is badly written. Stream-of-consciousness phrasing is hard to follow with any precision.	Drink 2 cups of coffee and start again.	Noted.
263	11.4	Need clarification on the process when to mitigate or avoid.		Comment addressed with SFI Section 7 Guidance - SFI Due Diligence System for Assessment Risk of



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				Sourcing from Controversial Sources.
266	11.4.3	Segregation of fiber after is already delivered is realistically not possible in many situations. This indicator should be removed or reworded to allow companies to utilize this fiber. Our understanding of the PEFC Due Diligence System does not require segregation.		Comment addressed with Indicator 11.4.3.
267	11.4.3	What happens if wood has entered the system and been processed prior to learning that is came from controversial sources. This could be the case for mills that maintain tight inventory.		Comment addressed with Indicator 11.4.3.
268	11.4.3	What happens if subsequent verification shows that the risk of this fibre originating from controversial sources is high.	Clarify if the fibre can re-enter the supply chain or not	Comment addressed with Indicator 11.4.3.
269	11.4.4	Please provide more guidance on what will be expected of Certified Organizations for mitigation measures of supply chains categorized as high risk. What criteria will SFI use to determine the "adequacy" of mitigation measures for high risk supply chains?	No changes proposed. More guidance requested.	Comment addressed with SFI Section 7 Guidance - SFI Due Diligence System for Assessment Risk of Sourcing from Controversial Sources.
270	11.4.4.b	reference to forest units - do you mean a geographic area? In Ontario "forest units" relates to predominant species present in the stand. Need clarification	Clarify the meaning of forest units in this context	Comment considered but not accepted as it does not improve the requirement.
271	11.5	Clear wording should be added to explain when this Performance Measure and Indicator are required. Our understanding is that avoidance is required when mitigation (11.4) is not effective.		Comment addressed with SFI Section 7 Guidance - SFI Due Diligence System for Assessment Risk of



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				Sourcing from Controversial Sources.
272	11.5	Avoidance is an absolute term and cannot be guaranteed additional verbiage should be added to address the reality that avoidance may not always be achieved.	Add: If avoidance is not achieved additional corrective measures must be implemented.	Edit considered but not accepted as it does not improve the requirement.
1	General Comment	1) The Fiber Sourcing Standard does too little to ensure that fiber comes from forests where management practices represent a meaningful improvement over status quo forestry that meets the regulatory minimum. 2) Beyond requiring adherence to BMPs, requiring logger training, promoting the use of trained loggers, and requiring investment in forestry research, the SFI Fiber Sourcing Standard is based largely on vague programs and policies and does not provide adequate assurances of responsible forestry, avoidance of controversial sources, and fiber legality.		SFI 2022 Fiber Sourcing Standard is unique. No other scheme has proactive requirements to address responsible sourcing of non-certified fiber.



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2	General comment	Adding recognition of Certified Logging Companies, and the in-the-forest verification that it provides, is a positive step for SFI FS. It reduces overlapping training requirements, provides Certified Organizations all of the tools in the tool box in which to meet the FS standard, and it creates value for CLC programs and its participants to continue their work of providing on-site field audits to logging companies. This type of collaboration should be positive for all involved- SFI, SFI COs, Logging Company suppliers.	The current draft is a good start, but I think there are other places where CLC could provide value to SFI FS standard. Including the use of CLC's in Obj. 4 Legal Compliance to help strengthen this Objective. Currently, attendance of logger training does not equate to the abidance of the law or legal requirements for logging suppliers.. There are many cases where suppliers are not following Workers comp laws, employment law, and other regulations. CLC programs include regulatory compliance in their standards. Adding CLC will add performance measures to the FS standard that it does not currently cover. This will improve the overall legal and regulatory complinace of logging suppliers and improve SFI's overall mission.	Edit considered but not accepted as it does not improve the requirement. Qualified Logging professional also need to demonstrate compliance with regulatory requirements so the Standard cannot just single out CLC.



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3	General Comment	<p>As this process has evolved it seems more clear to me that including Certified Logging Companies could be done more efficiently. Adding CLCs to the scope of the standard similar to the reference that "Certified Organizations that source all of their primary sources from forests certified to SFI FM, AMERICAN Tree Farm or CSA do not have to certify to the Fiber Sourcing Standard" could bring value and recognition to both the CO mills and the CLC.</p> <p>example 1. "Certified Organizations that source 75% or more of their fiber from SIC recognized CLC standard participants are not responsible for objectives 1,2,3,4,6, 11 of the Fiber Sourcing Standard " CLC programs are on parallel paths as SFI Co mills. Much of the work that CLC's perform could be captured in the FS standard. CO would be showing support and recognition of CLC programs. The CLC standard could be formally cross-walked to the Fiber Sourcing Standard. I have provided a rough draft of this crosswalk in the attachments. THIS COULD PROVIDE MAJOR VALUE TO CO MILLS AND PROVIDE VALUE TO THE IN-FOREST VERIFICATION THAT CLC'S PROVIDE. WHY OVERLAP WHAT IS ALREADY BEING DONE? CREATE AN EASIER ,YET, STILL STRINGENT, PATHWAY TO FS WOOD. THE RESPONSIBILITIES OF EACH PERSON IN THE SUPPLY CHAIN WOULD BE MORE WELL PLACED.</p>	"Certified Organizations that source 75% or more of their fiber from SIC recognized CLC standard participants are not responsible for objectives 1,2,3,4,6, 11 of the Fiber Sourcing Standard "	Edit considered but not accepted as it does not improve the requirement nor is it feasible.



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6	1.1	Scope- How about "traders". They are exempt too?	1.1 Scope: A wood producer/trader delivering roundwood or field chips direct from the forest to a manufacturing	Edit addressed by the definition of 'wood producer'. See Section 14 - Definitions.
7	1.1	Scope- 1) It may be better to state "wood/fibre" instead of "fiber" only. 2) besides production and manufacturing it applies to distribution and trading as well.	Clause 1.1 Scope: The SFI 2022 15-2019 Chain of Custody Standard is an accounting system that tracks forest wood/ fiber content through manufacturing, distributing and trading to the end product.	Edit consider but not accepted. 'Forest fiber' understood to include wood.
5	1.1	scope- The draft Chain of Custody Standard includes wording in the 3rd paragraph under the heading What the Chain of Custody Standard Covers that is new and states: A certified organization (such as a warehouse or distribution center) that passes on SFI certified material/product does not need an SFI chain of custody system provided the SFI certified material/product is in its original packaging and the material/product is identified with an SFI chain of custody on-product label. In the current Standard, on-product labelling is optional and the chain is passed with the claim on documentation such as bills of lading. However the way the above sentence is worded, it sounds like SFI is changing its approach to require on-product labelling to maintain the	A certified organization (such as a warehouse or distribution center) that passes on SFI certified material/product does not need an SFI chain of custody system provided the SFI certified material/product is in its original packaging.	Edit accepted. See Scope 1.1.



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		chain through warehouses or distribution centers, even when the warehouse or distribution center does not take ownership of the certified product, and the product remains in its original packaging. A) If this is the intent, a requirement to apply on-product labels to all products that are being sold as Chain of Custody certified would create a burden to our company because the nature of OSB panels makes it can be very difficult to apply consistently clear and legible on-product labels. Norbord disagrees with mandatory on-product labelling and we are requesting that this be dropped and not included in the final Standard. B) If this is not the intent, our recommended wording has been added in the Proposed new language column.		
8	1.2	Additional Requirements- Page 28 states: "Certified Organizations that source all of their primary sources from forests certified to the SFI Forest Management Standard , American Tree Farm Standard or CSA Z809 Standard do not have to certify to the SFI Fiber Sourcing Standard." I.e., potentially, if I understand that correctly, it may make sense here to reiterate this statement from page 28.		Comment addressed by revised 1.2 Additional Requirements.
9	2	Requirement for Chain of Custody Process. Removed "Physical Separation Method" from Part title	Should change this title to "Physical Separation Method", since it strictly applies to that method (like Part 3 that is named for the method it applies to)	Edit accepted - see Part 2.





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11	2.2	This paragraph uses a defined term: certified content that is narrowly defined in Section 14 to only include Certified Forest Content (i.e. product of SFI certified forests).	The definition of Certified Content is badly flawed.	Comment addressed by definition of certified content in SFI Section 14 - Definitions.
10	2.2	It may state Separation/identification of the Certified Content. Many companies nowadays work with bar codes or other identifiers and do no longer need to separate.	2.2: Separation/identification of the Certified Content	Edit addressed with 2.2.1.
12	3	I think the intent was to move this to Part 2 so that all accounting methods were in the same "part" / section. That's what the comments say anyway and I agree that would be cleaner. Suggest deleting "part 3" section break and moving the content under Part 2.		Edit considered but not accepted as improving the requirement.
13	3	Would be nice if the nomenclatures from the PEFC ST 2002_2020 were taken instead.	Part 3: Percentage and Credit Method	Edit accepted. See Part 3.
14	3	PEFC has changed their percentage and credit system terminology to the "percentage method" and the "credit method".	Change "average percentage method" to "percentage method", and "volume credit method" to "credit method" in all applicable locations.	Edit accepted. See Part 3.



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15	3	Could/should "de minimus" volumes and training req'mnts in the FS standard be some how linked to the SFI CoC standard given the intended alignment with PEFC CoC [2020 version] (and FSC CoC/CW) standards that go beyond forest based material and includes tree based material - i.e. an arbourist's deliveries to a client's mill in the PNW. Small volumes but still an important procurement source but from urban non-forest environment. Clearly not a QLP/certified logger as defined by SFI Inc. May be able to avoid any perceived/real inconsistencies between the standards.		Comment addressed with 3.3.1 a.
16	3	PEFC has changed their percentage and credit system terminology to the "percentage method" and the "credit method".	Change "average percentage method" to "percentage method", and "volume credit method" to "credit method" in all applicable locations.	Edit accepted. See Part 3.
17	3	The draft Chain of Custody Standard 3.1 - General Requirements for Mixing of Inputs states: The percentage-based method applies to certified organizations with facilities where certified content is mixed with non-certified forest inputs that cannot be clearly identified in the output products. The draft Chain of Custody Standard 3.3 - Calculation of the Certified Percentage; 3.3.1 states: The certified organizations shall calculate the certification percentage separately for each claim period according to the following formula... Norbord	A) Rewrite 3.1 - General Requirements for Mixing of Inputs as follows: Where certified content is mixed with non-certified forest inputs that cannot be clearly identified in the output products, certified organizations must use either the Average Percentage Method or the Volume Credit Method;	A - Edit addressed with 3.1. B - Addressed with 3.2. C- Edit considered but not accepted as it does not improve the requirement. D - Edit considered but not accepted as it does not improve the requirement. E - Edit considered but



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
		uses the Volume Credit Method for mixing inputs, not the Average Percentage Method, and we follow all the requirements for managing input material, input/output ratios, and the volume credit account, and track these in units of incoming tons and outgoing volume. Using the Volume Credit Method, we have no need to manage incoming material or outgoing product in percentages, and are unclear why the SFI Standard makes it sound like the percentage-based method applies to all organizations that mix inputs. The way Norbord is interpreting the wording in the Part, SFI is requiring certified organization that use the Average Percentage Method or the Volume Credit Method to maintain certified percentages. This seems to be supported by the fact that 3.3 - Calculation of the Certified Percentage is not a subsection that is clearly only applicable to organizations using the Average Percentage Method. Norbord does not believe certified organizations using the Volume Credit Method should be required to calculate and maintain a certified percentage. As a result, Norbord is requesting changes to this Part of the Standard as outlined in the Proposed new language column.	<p>B) Keep 3.2 - Definition of the Product Group unchanged;</p> <p>C) Rename 3.3 to Average Percentage Method and move the information currently in 3.4 - Average Percentage Method here;</p> <p>D) Move Calculation of the Certified Percentage (currently 3.3) under the new 3.3 - Average Percentage Method as a subsection or, another option is to keep Certified Percentage as its own section, now 3.4, but change the wording in every line that includes the certified organization to clarify this section applies only to certified organizations that use the Average Percentage Method. For example: The certified organization using the Average Percentage Method shall calculate the certification percentage separately for each claim period according to the following formula...; and</p> <p>E) Keep the Volume Credit Method section unchanged</p>	not accepted as it does not improve the requirement.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
			under the new 3.4 (or 3.5 if the decision is made to keep Certified Percentage as its own section). These changes make it clearer that only certified organizations using the Average Percentage method are required to calculate certified percentages.	
18	3.1	The next of many, many uses of the defined term "certified content" that are illogical if the definition is applied strictly.	Fix the definition (see section 14)	Comment addressed by definition of certified content in SFI Section 14 - Definitions.
19	3.2.4	"The product group may cover several sites" is a good addition. Does that include credit sharing in a multi-site organization.	See comments #2 below on credit sharing un a multi site organization.	Comment addressed by definition of certified content in SFI Section 14 - Definitions.
20	3.2.4	Positive to add 'the product group may cover several sites'		Noted.
21	3.2.4	An unclear and badly written clause that is "explained" with a longer NOTE. Does this refer to geography? Only geography?	Go back and re-write the clause so it is clear on it's own. If the NOTE is still needed, you're not done.	Comment considered but not accepted as it does not improve the requirement.
22	3.2.6	An unclear and badly written clause that is "explained" with a longer NOTE. This seems to say: "A product group should be defined so that we know what it is and is not". Does this need to be said at all?	Go back and re-write the clause so it is clear on it's own. If the NOTE is still needed, you're not done. Consider whether this clause would be missed if dropped.	Comment considered but not accepted as it does not improve the requirement.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
23	3.3.1	This clause is clear, except for defined terms. If Vc means only certified content, then the clause may not be used to calculation % of recycled and/or certified sourcing. If Vo only means certified sourcing, then the formula is useless for reporting % of certified sourcing.	Root problem is that this clause assumes only 1 kind of certified content. But the standard recognizes 3.	Comment addressed by definition of certified content in SFI Section 14 - Definitions.
24	3.3.1	Note-"...both can count..." effectively contradicts the defined term "certified sourcing". Better to go back and fix the definition.	Apply the certified content definition to include all 3 categories of relevant content.	Comment addressed by definition of certified content in SFI Section 14 - Definitions.
25	3.5.5	What is meant by "certified material"? Same as certified content? Something else?	Fix the definition (see section 14) for certified content and use it here.	Comment addressed by definition of certified content in SFI Section 14 - Definitions.
26	3.5.7	Credit expiration to 24 months is a good update but see recommendation.	This requirement should clearly state that the credit sharing in a multi site organization is permitted.  We also recommend to remove the expiration of the credits...as per money in a bank account, credits should never expires as they were legitimately gained.	Edit addressed by 3.2.4. Credit expiration is addressed in 3.5.7 a.
27	3.5.7	It appears that this section is related to a non-certified organization going through its initial certification audit rather than an organization with an existing certification. That distinction needs to be made.	An organization which has yet to complete its registration audit that plans to use the Volume Credit method can start counting all eligible credit after the completion of a successful internal audit of the	Edit addressed by 3.5.7 b.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
			chain of custody system and completion of a management review of the chain of custody system performance 365 days prior to the initial registration audit. Accumulated credits can be utilized for the sale of products only after successful completion of the registration audit and receipt of the chain of custody certificate from their certification body.	
28	3.5.7	Positive change to allow credits to last longer (to align with new PEFC COC). SFI notes that there will be a table or guidance for how to move from 12 to 24 months		Noted.
29	3.5.7	Support the change to 24 months to align with FSC and PEFC. Thank you.		Noted.
30	3.5.7 ii	Too long, and applies narrowly.	Asking auditors to verify this at each and every audit is not free. Put this back in guidance.	Comment considered but not acceptable. Task Group determined that this should be moved from Guidance into the Standard.
31	4	Whats the process for moving to a CoC PEFC endorsement and who program participants should be requesting this from if they want it?		SFI is submitting the SFI Chain of Custody Standard for endorsement by PEFC.
32	4	How are standards handled for non-wood material contained in recycled products		The standard does not address non-wood fiber in recycled products.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
33	4.1	The term "category of the origin" is both unnecessary and commonly confusing.	In 1st paragraph, substitute "following information". At (d), substitute "certification claim or status"	edit addressed with 4.1 d. i.
34	4.1	"ii. SFI Certified Sourcing or X% SFI Certified Sourcing" and "v. SFI X% Certified Sourcing or SFI Certified Sourcing" appear redundant.		edit addressed with 4.1 d.
36	4.1	Note 1-Citing the definition doesn't help. The definition of "origin" only covers CFC, Cert. Sourcing, Recycled.	Following suggestion above should remove need for this note.	Edit considered but not accepted as it does not improve the requirement.
37	4.1	Note 2-The phrase "must know" is imprecise and unhelpful.	This note represents an attempt to explain the meaning of a standard clause. Always a sign that the clause may not be clear as written. See note above for 4.1.	Edit considered but not accepted as it does not improve the requirement.
35	4.1	Note 2- Spelling! "suppler" instead of "supplier".		Fixed
38	4.1.d	It is unclear why SFI is not used in line iii, iv and ix	An explanation should be provided to explain that any recycled input and fiber from a certified forest is eligible input for CoC	edit addressed with 4.1 d.
40	4.1 d.	i. X% SFI Certified Forest Content - Raw material from a forest certified to an acceptable forest management standard constitutes a claim of 100 percent certified forest content  This information can be documented in the form of, but not limited to, an invoice, bill of lading, shipping document, letter, or other forms of	i. should the 100% read as X%?? Not sure to understand this one.  Change between the certified organization and the next entity for "between the supplier and the customer".	edit addressed with 4.1 d. i.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
		communications between the certified organization and the next entity in the supply chain.		
39	4.1 d.	The draft Chain of Custody Standard 4.1 - Identification at Delivery Level; d. Category of Origin has what appears to be two identical bullets: ii SFI Certified Sourcing or X% SFI Certified Sourcing; and v. SFI X% Certified Sourcing or SFI Certified Sourcing. Also there are 2 v. bullets - X% SFI Recycled Content; and SFI X% Certified Sourcing or SFI Certified Sourcing.	Remove one of the duplicated bullets (ii and v) and change the 2nd v to vi etc.	edit addressed with 4.1 d.
41	4.1.e	Error - change wording to reference the supplier's certificate number (as opposed to current wording that says "CoC number...", because the supplier might have a FM Certificate number vs a CoC number.	e. The supplier's certificate number, if applicable.	edit addressed with 4.1 e.
42	4.2	Revised wording is ambiguous, potentially very onerous if misunderstood to mean all suppliers in the supply-chain of a given product/input must be verified or that the certificate holder needs to verify/prove that "all criteria set for the supplier have been met." I don't even know exactly what this means. The previous wording was concise and clear and consistent with FSC and PEFC. I don't understand the rationale for this change.	Return to the previous/existing text: "... shall verify the validity and scope of the forest management, fiber sourcing or CoC certificate."	Comment addressed by 4.2.
43	4.2	This clause uses "certified forest content" instead of "certified content". Hopefully a mistake. If intentional, it requires Supplier Verification only for suppliers of virgin, certified inputs.	Change to "certified content". And fix the definition (see Section 14).	Comment addressed by 4.2.





Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
44	5.1	simplification is required	Change "the certified organization shall provide the next entity" for "the supplier shall provide the (its) customer".	Edit considered but not accepted as it does not improve the requirement.
45	5.1	I wonder if it should rather state ". . . a clear indication of output category". "output" because that's what the supplier delivers versus what the supplier put into their products.	At the point of sale or transfer of the certified products to another entity, the certified organization shall provide the next entity in the chain with written information confirming the supplier's certification status and an official SFI claim statement providing a clear indication of output category.	Edit considered but not accepted as it does not improve the requirement.
48	5.2	Could 5.1 match exactly 4.1 (plus the notes)?		Edit considered but not accepted as it does not improve the requirement.
46	5.2	It is unclear why SFI is not used in line ix	An explanation should be provided or for consistency, "SFI" should be added to these items	Edit addressed with 5.2.
47	5.2	This looooooong list of claim options includes (appropriately) "certified sourcing". This will be illogical if, in fact, certified sourcing is not included in definition of "certified content"	Fix the definition (see section 14) for certified content!!	Comment addressed with definition of certified content.



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49	5.3		Suggest that section 5.3 strictly be the title and the remaining text be made indicator 5.3.1 (to align with the rest of the Standard)	Edit considered but not accepted as it does not improve the requirement.
50	6.1	How about "distributors/traders" besides producers?	Primary or secondary producers/distributors/traders outside the United States and Canada must submit to the Office of Label Use and Licensing:	comment addressed with 6.1.
51	7	Support the changes and expansion/strengthening. If tweaks are made in CoC or Fiber Sourcing standard, need to ensure those tweaks are carried through so that this text remains exactly the same for the efficiency of companies that hold both certificates.		Noted.
52	7	Was the Lacey Act requirements considered in developing the due diligence requirements? Would be nice if we could use the SFI DD as part of our Lacey Act DD.		Lacey Act is addressed by the reference to federal legislation in the definition.
54	7	Controversial sources can use one of the aforementioned sources or additional that are forthcoming. By opening it up to 10+ definitions that's not a 'definition'		Noted.
53	7	Would the FSC National risk assessment for Canada and USA be acceptable within the SFI program? Many companies have dual certification		As long as it meets the requirements of Part 7 it can be used.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
55	7	Organizations certified under the Chain of Custody Standard should be required to provide support to the SFI Implementation Committees that help make procurement of certified forest fiber content available to them. The work of the Implementation Committees helps to locally foster the social license of forest products manufacturing that Chain of Custody Certified Organizations benefit from.	Organizations certified under the Chain of Custody Standard should be required to meaningfully contribute to their local Implementation Committee(s) either within this section or by adding a requirement to SECTION 4, 1.2.	Currently nothing prevents a CoC certified organization from joining the applicable SIC.
56	7	Organizations certified under the Chain of Custody Standard should be required to provide support to the SFI Implementation Committees that help make procurement of certified forest fiber content available to them. The work of the Implementation Committees helps to locally foster the social license of forest products manufacturing that Chain of Custody Certified Organizations benefit from.	Organizations certified under the Chain of Custody Standard should be required to meaningfully contribute to their local Implementation Committee(s) either within this section or by adding a requirement to SECTION 4, 1.2.	Currently nothing prevents a CoC certified organization from joining the applicable SIC.
58	7.1	This is a positive change, since conversion on very small area (e.g. aggregate pit or hydro line in Ontario, or mining activities in Quebec) may be accepted if regional decline is minimal	Suggest that section 7.1 be the title and the remaining text be made into indicators (to align with the rest of the Standard).	Edit considered but not accepted as it does not improve the requirement.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
57	7.1	<p>See comments for OBJ 11 in FS Standard and definition of controversial sources in definition section.</p> <p>1. Segregation of fiber after is already delivered is realistically not possible in many situations. This indicator should be removed or reworded to allow companies to utilize this fiber. Our understanding of the PEFC Due Diligence System does not require segregation.</p> <p>2. Clear wording should be added to explain when this Performance Measure and Indicator are required. Our understanding is that avoidance is required when mitigation (11.4) is not effective.</p> <p>3. Avoidance is an absolute term and cannot be guaranteed additional verbiage should be added to address the reality that avoidance may not always be achieved.</p>	<p>For 3.</p> <p>Add: If avoidance is not achieved additional corrective measures must be implemented.</p>	Comment address with 7.5.3.
59	7.1	Some terms with definition are not in italic	Controversial sources in title and Conflict timber in h.	Fixed.
60	7.1 & 7.5.2	The draft Chain of Custody Standard 7.1 Due Diligence System to Avoid Controversial Sources, 7.5.2 uses the word participant, should this be changed to certified organization for consistency?	Replace participant with certified organization	Fixed



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61	7.1 g	As worded, this statement appears to imply that trade in CITES-listed species is illegal. The majority (approximately 90%) of CITES-listed species, including tree species, are listed on CITES Appendix II, for which international trade in wildlife specimens and derivatives is legal, provided the specimens are accompanied by a CITES export permit indicating a finding of non-detrimental trade and legal acquisition have been made by the designated Scientific and Management Authorities of the country of export.	“Illegal Logging ” means harvesting and trading of wood fiber in violation of applicable laws and regulations in the country of harvest including trade in species listed on Appendix II and III of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) where requisite export permits or similar documents required for legal trade are not provided. Part 7, page 11. Text referenced for revision is repeated on pages 52, 134, 142, 194.	Edit considered but not adopted. Standard requirement as currently worded is sufficient.  Trading in species in contravention of CITES is an example of a form of illegal logging.
62	7.1.1 b	According to this definition, would forest activities that may contribute to reducing the long-term caribou population in Canada (e.g., clearcutting mature boreal forests not in protected/conserved area) be considered as a controversial source of fibre?	Clarify definition of controversial sources	Definition is clear and aligns with the corresponding PEFC definition.
63	7.2.2	Clarity needs to be made that all exemptions are when procured from a supplier with a valid...not procured with a valid...	For example: Procured <u>from a supplier with a</u> valid SFI Section 2 (SFI Forest Management Standard ) certificate, or other acceptable forest management standards , that clearly	Addressed with 7.2.2.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
			indicates that the source is within the scope of the certification;	
64	7.3.2	Align with PEFC and use the terms Negligible and Significant		Edit considered but not accepted as it does not improve the requirement.
65	7.4.2	The use of "data" is limitative	Should read "information"	Edit considered but not accepted as it does not improve the requirement.
66	7.5.3	This requirement is not practical/implementable	If the product is already received, there is no way to segregate it afterward, the wood would already be mixed in the mill yard.	Addressed with 7.5.3.
67	7.5.3	Segregation is not a viable option and should be removed. See comments in FS 11.4.3		Comment considered but not accepted as it does not improve the requirement.
68	7.5.5	The use of "should" is questioned	Prefer "shall"	Addressed with 7.5.5.
69	7.6.1	Avoidance is an absolute term and cannot be guaranteed additional verbiage should be added to address the reality that avoidance may not always be achieved.	Add: If avoidance is not achieved additional corrective measures must be implemented.	Edit considered but not accepted as it does not improve the requirement.



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70	8.2.1	Not sure if ALL customers need to see documents to this regard. Maybe, the words "as needed" can be added.	The certified organization's organization's top management shall define and document its commitment to implement and maintain the chain of custody requirements, and make this available to its personnel, suppliers, customers, and other interested parties as needed.	Edit considered but not accepted as it does not improve the requirement.
71	8.2.3	It will help to define the "periodic review" further.	At least once a year, the certified organization's organization's top management shall carry out a regular periodic review of the chain of custody and its compliance with the requirements of this standard.	Edit considered but not accepted as it does not improve the requirement.
72	8.2.5	Warehousing and health/safety could be added.	f. warehousing g. health & safety	Edit considered but not accepted as it does not improve the requirement.



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73	8.2.5 b.	The draft Chain of Custody Standard 8.2 Responsibilities and Authorities for Chain of Custody, 8.2.5 b. states: product processing covering physical separation or percentage calculation and transfer into output products. In support of Comment #2 above regarding differentiating more clearly between the methods used by certified organizations, this bullet does not consider the Volume Credit Method. We recommend the wording for this bullet be modified as outlined in the Proposed new language column	product processing covering physical separation, percentage calculation, or volume credit, and transfer to output products	Edit addressed by 8.2.5. b.
74	8.2.6	Wording error in : "This includes having a policy demonstrating compliance with social laws..."	A policy does not demonstrate compliance.  This include having a policy including commitments to laws compliance...	Edit considered but not accepted as it does not improve the requirement.
75	8.4.1 a.	The word "raw" could be deleted as products are not always raw that are procured. records of all purchased forest-based raw material, including information on its origin;		Comment considered but not accepted as it does not improve the requirement.
76	8.4.1 c.	The draft Chain of Custody Standard 8.4 Record Keeping, 8.4.1 c. states: records that demonstrate how the certification percentage for each product group was calculated. In support of Comments #2 and #6 above regarding differentiateing more clearly between the methods used by certified organization, this	record that demonstrate how the certification percentage for each product group was calculated as applicable	Edit addressed by 8.4.1 c.





Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
		bulled should be clarified and the proposed rewording is given in the Proposed new language column		
77	8.4.1 e.	The new PEFC standard has a nice summary explaining required actions for non-conformances (see PEFC ST 2002_2020, Clause 4.8). This could be added to this or following sections:	<p>"When a nonconformity with the requirements of this standard is identified through internal or external auditing, the organisation shall:</p> <ul style="list-style-type: none"> <li>a) react to the nonconformity and, as applicable: <ul style="list-style-type: none"> <li>i. take action to control and correct it</li> <li>ii. address the consequences</li> </ul> </li> <li>b) evaluate the need for action to eliminate the causes of the nonconformity, in order that it does not recur or occur elsewhere, by: <ul style="list-style-type: none"> <li>i reviewing the nonconformity</li> <li>ii determining the causes of the nonconformity</li> <li>iii determining if similar nonconformities exist, or could potentially occur</li> </ul> </li> <li>c) implement any action needed</li> <li>d) review the effectiveness of any corrective action taken</li> <li>e) make changes to the management system, if necessary"</li> </ul>	Edit considered but not accepted as it does not improve the requirement.



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78	8.6.1	Clarify when a certify body's approval is required. If cannot clarify remove reference		Comment addressed by 8.6.1.
79	8.6.1	ISO has removed the idea of "preventative actions" and just uses "corrective action", since the whole due diligence system acts as a preventative action. EACOM questions the need to have the CB agree/discuss the internal audit approach in advance as this is verified during the external audit	Suggest removing "and preventative" as well as "provided they have discussed this approach with their certification body and it agrees"	Comment considered but not accepted as it does not improve the requirement.
80	8.6.2 c.	c. and d. are partly redundant and could be merged.	c. If there have been no SFI certified inputs and outputs/sales for a site or manufacturing facility over the past year, internal audits are not required;	Edit considered but not accepted as it does not improve the requirement.
81	8.6.2 f.	The draft Chain of Custody Standard 8.6 Internal Audit and Management Review, 8.6.2 f. is missing the word level at the end of the sentence	Add level for organizational level	Edit addressed by 8.6.2. f.
82	9.2	It will be helpful if this section also requires the outsourced contractor to have some procedures in place that enables compliant follow-ups with outsourced material.	The certified organization shall have a written agreement with all entities to whom activities have been outsourced, ensuring that: d. the contractor has written procedures in place prohibiting any mixture between outsourced material and any other material.	Edit addressed by 9.2 a. and d.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
			e. records of inputs/outputs are available.	
83	9.2.a	Remove the phrase physically separated and replace with Clearly identified.		Edit addressed by 9.2 a.
84	9.2. c & 9.5	9.2.c and 9.5 seem to conflict with eachother in teh sense that 9.2.c is prescriptive and requires annual audits but 9.5 allows for a sampling approach. Support the flexibility to conduct a sampling of x/number, focusing on those with higher risk due to labeling/converting activities. This may not be necessary for outsourcers who do not apply labels / alter the product and/or for those who may do limited business for teh certificate holder in a given year.		Comment addressed with 9.2 c. and 9.5.
85	9.6.a	The draft standard references a risk determination in Part 9 "Outsourcing Agreements". However, the existing low/high risk determination criteria are crossed out the standard.	Include existing risk determination.	Draft 9.6 a. removed in final version.



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86	Appendix 1: Calculation of the Certification Percentage. Definition of the Product Group (Informative)	<p>PEFC in its document "PEFC GD 1008_2019_InformationRegistrationSys" provides product categories in Appendix 2 of this document.</p> <p>BTW, this section as it relates to the Product Group could be allocated to another section describing Product Groups as Appendix 1 relates to the % calculation only.</p> <p>Products can be extracted from this document by clients to define their products. They are then entered into CB reports and ultimately into PEFC's database enabling interested parties searching for SFI material.</p> <p>It could help if SFI used this system as well for clear product categorization and identification.</p>	See PEFC GD 1008:2019; PEFC Information and Registration System – Data Requirements; Appendix 2	Comment considered but not accepted as it does not improve the requirement.
1	General	will new SFI certified source standard recognize PEFC and FSC towards the certified percentage.		PEFC recognized certified content (SFI, CSA Z809 and ATFS) are eligible for Certified Sourcing.
2	General	Do you expect the SFI COC standard to be endorsed by PEFC		SFI is submitting the SFI Chain of Custody Standard for endorsement by PEFC.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
3	General	Strongly support getting the CoC standard fully endorsed to PEFC!		Noted
4	General	I hope that you will expand on PEFC endorsement for CoC -> “also...possibly...”		SFI is submitting the SFI Chain of Custody Standard for endorsement by PEFC.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
4	1.1	We cannot find any examples of companies who might certify to this standard who are not better served by using another of the SFI standards. Primary Producers are required to certify to Section 3, so Section 5 will always be redundant. Secondary Producers can - in every case - apply Section 4.	Discard this redundant and unnecessary Section entirely (see notes below)	Noted.
5	1.2	Spelling! Instead of "manufacturer" it shall state "manufactur".		Fixed
6	1.3	The SFI Certified Sourcing label should be eliminated. It is misleading to the marketplace to have a label that has no connection to certified forests but looks nearly identical to the Chain of Custody labels that do. If the label is kept, it should be radically revised so that is entirely different from the CoC labels (the current reliance on taglines and other information underneath the SFI logo is insufficient) and the lack of connection to certified forests is explicit.		Noted. The Task Group determined that retaining the Certified Sourcing label in its current configuration was the best option given its acceptance in the marketplace.



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7	1.3	The SFI Certified Sourcing Label should be eliminated or strengthened significantly to address the issues in the parenthetical above; it is misleading in the marketplace to have a label that looks similar to other SFI labels but does not require any association with content from certified forests. Over time, this undermines public trust in the label and the program.		Noted. The Task Group determined that retaining the Certified Sourcing label in its current configuration was the best option given its acceptance in the marketplace.
9	3	Same as for 3.3.3, potentially this can include sales invoices as well.	In all cases, the organization must demonstrate that the requirements of 3.1 and/or 3.2 are met before the label can be used or claims be made in sales documents in relation to a specific product group or time period.	Edit considered but not accepted as it does not improve the requirement.
8	3	I do not think the words "creating" or "claim" are completely appropriate or descriptive here. I suggest using the word "Applicability of the Certified Sourcing Section" vs. "Creating..." or perhaps "Scope/Application of a Certified Sourcing Section" or perhaps "Calculating the Certified Sourcing Claim." Also, text throughout Part 3 still refers to the "label" even though this Part was retitled to refer to a claim not the label.	Applicability of the Certified Sourcing Section or Calculating the Certified Sourcing Claim ( <i>change wording in 3.3.1.b to match</i> )	Edit addressed with Part 3 - Calculating the Certified Sourcing Claim.
10	3.2	This clause - establishing the 2/3 threshold for application of the Certified Sourcing claim by secondary producers can be easily and painlessly inserted into Section 4.	Insert the 2/3 threshold into Section 4.	Comment addressed with Part 4, 4.3.



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11	3.3	I wonder if that is not only true for labels, but also for sales documents in general.	Calculation of percentage for use of the Certified Sourcing Label and information in sales documents is as follows:	Edit addressed with 3.3.
12	3.3, 3.3.3, & 3.3.4	still referring to label even though the title of Part 3 refers to claim	Change label to claim	Edit addressed with 3.3, 3.3.3 and 3.3.4.
13	3.4.1	A certificate itself may not be valid anymore when a company is suspended or even terminated. Data entries in SFI's database however are a safer tool to determine a company's certificate status.	Certified sourcing claim verification can occur through SFI's Database ( <a href="https://sfidatabase.org/index.php">https://sfidatabase.org/index.php</a> ) or, an invoice, bill of lading, shipping document, letter, or other forms of communications available to the customer.	Edit addressed with 3.4.1.





Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
14	5	It is still a bit confusing the application/scope of this new section. Would a primary manufacturer need to be audited to this section if they wanted to apply the label/claim, in addition to of course being audited to the Fiber Sourcing standard also? I understand the rationale for the new section but I still think some clarification is needed as to the interconnectiveness of this vs. the Fiber Sourcing standard. Based on the note in 1.1 (scope) it appears the CoC standard will cover this for the primary manufacturer but I did not see where in teh CoC standard thsi was addressed and this seemed to conflict with some of teh notes/explanations in teh track/change version. It might be more clearly worded/explained to state clearly that this is ONLY for secondary manufactueres who are not CoC certified and where the Fiber Sourcing procurement requirements / standard is not relevant. I also think this might be better placed as Section 4 so that it immediately follows the Fiber SOurcing Standard but I realize this would require re-numbering of everything.		Primary Manufacturers wishing to apply the Certified Sourcing Label will need to be certified to SFI Section 5 - SFI 2022 Certified Sourcing Standard or maintain SFI 2022 Chain of Custody Standard certification.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
15	5	The current SFI Certified Sourcing label is misleading to consumers, as it provides no guarantee that fibers were sourced from non-controversial sources. The lack of transparency behind this label provides unnecessary confusion in the marketplace due to the wide range of practices that can be behind the label. These practices can vary greatly, across what are considered “responsible sources”, from SFI or CSA certified lands, to 100% pre-consumer materials, to SFI Fiber Sourcing. Beyond BMPs and using trained loggers, SFI Fiber sourcing standard is based solely on outreach and does not provide assurances on responsible forestry, avoidance of controversial sources such as conversion (see the controversial sources section below), and fiber legality.	At a minimum, expand the definition of SFI controversial sources to protect against ecological threats that go beyond basic legality requirements. This would include language prohibiting conversion or degradation of natural forests or areas with valuable biodiversity. It would also include requirements for companies to monitor sources for unacceptable wood or fiber that could be coming from these controversial sources. If tracking and documentation of controversial source to assess risk identifies a source as potentially controversial, the standard should go beyond desk audits and include field verification of sourcing claims.	Definition goes beyond strict legality. Definition aligns with the PEFC definition of controlled sources.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
16	5.2	<p>Suggest adopting EPA definitions of pre and post-consumer recycled fiber. The second sentence could be in conflict with the EPA pre-consumer definition at <a href="https://www.epa.gov/smm/definitions-specifications-and-other-guidance-about-comprehensive-procurement-guideline-program">https://www.epa.gov/smm/definitions-specifications-and-other-guidance-about-comprehensive-procurement-guideline-program</a>. Our company has changed our guidance to customers and our own processes to match the EPA definitions (which current SFI aligns with) and we encourage SFI to stay as close to EPA definitions as possible.</p> <p>Definitions shown on this page include some examples to help clarify manufacturing and converting operations. Click here for the formal definitions found in RCRA Section 6002.</p>	See EPA definitions	Task Group determined that retaining existing definitions for pre and post recycled content was the best approach as it aligns with the PEFC definitions.
17	5.3	<p>Suggest adopting EPA definitions of pre and post-consumer recycled fiber. <a href="https://www.epa.gov/smm/definitions-specifications-and-other-guidance-about-comprehensive-procurement-guideline-program">https://www.epa.gov/smm/definitions-specifications-and-other-guidance-about-comprehensive-procurement-guideline-program</a>. Our company has changed our guidance to customers and our own processes to match the EPA definitions (which current SFI aligns with) and we encourage SFI to stay as close to EPA definitions as possible. Although we recognize the influence and desire to completely align</p>	<p>EPA definition: Postconsumer fiber means:</p> <ul style="list-style-type: none"> <li>• Paper, paperboard, and fibrous materials from retail stores, office buildings, homes, and so forth, after they have passed through their end-usage as a consumer item, including: used corrugated boxes; old newspapers; old magazines; mixed waste paper; tabulating cards; and used cordage; and</li> </ul>	Task Group determined that retaining existing definitions for pre and post recycled content was the best approach as it aligns with the PEFC definitions.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
		with PEFC, SFI is a domestic certification standard to NA and should align with common interpretations and uses of these terms.	<ul style="list-style-type: none"> <li>• All paper, paperboard, and fibrous materials that enter and are collected from municipal solid waste.</li> <li>• Postconsumer fiber does not include fiber derived from printers' over-runs, converters' scrap, and over-issue publications.</li> </ul> <p>Recovered fiber means: Postconsumer fiber such as:</p> <ul style="list-style-type: none"> <li>• Paper, paperboard, and fibrous materials from retail stores, office buildings, homes, and so forth, after they have passed through their end-usage as a consumer item, including: used corrugated boxes; old newspapers; old magazines; mixed waste paper; tabulating cards; and used cordage; and</li> <li>• All paper, paperboard, and fibrous materials that enter and are collected from municipal solid waste, and</li> </ul> <p>Fiber from manufacturing and converting operations, such as:</p> <ul style="list-style-type: none"> <li>• Dry paper and paperboard scrap generated after completion of the papermaking process (that is, those mill operations that occur</li> </ul>	



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
			<p>after production of the paper machine reel), which includes scrap generated through slitting, cutting, trimming and other converting operations by the paper manufacturer;</p> <ul style="list-style-type: none"> <li>• Envelop cuttings, bindery trimmings, and other paper and paperboard recovered materials resulting from printing, cutting, forming, and other converting operations;</li> <li>• Recovered bag, box, butt rolls, and carton manufacturing materials, mill wrappers, and rejected unused stock; and</li> <li>• Repulped finished paper and paperboard from obsolete inventories of paper and paperboard manufacturers, merchants, wholesalers, dealers, printers, converters, or others.</li> </ul> <p>Mill broke means any paper scrap generated in a paper mill prior to completion of the papermaking process. It is usually returned directly to the pulping process. Mill broke is excluded from the definition of "recovered fiber."</p>	



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
18	6.2	Not sure if the range of dates for manufacture of the product is really needed. It seems that is information could be deleted as it may not serve information needed for the integrity of the CoC system.	Delete subpoint "c.".	Edit considered but not accepted as it does not improve the requirement.
19	7	Support the changes and strengthening - just need to make sure it exactly matches that in the other standards at the end of the day when all is said and done with the revisions/edits.		Noted
21	7.1	We acknowledge SFI's new indicator that indicates logging in the United States and Canada has the potential to be illegal. However, language to prevent the inclusion of controversial sources in SFI certified products remains inadequate. The latest changes to the SFI definition of 'controversial sources' predominately stipulate that legal requirements and regulations must be met for a source to be deemed non-controversial. These legal requirements exist independent of the SFI standard and stating that sourcing must obey existing legal requirements adds no rigor to the SFI standard when these laws, by definition, must already be obeyed.		Definition goes beyond strict legality. Definition aligns with the PEFC definition of controlled sources.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
20	7.1	<p>Controversial Sources: Bullet B: The term conservation implies dollars spent towards a specific conservation activity.</p> <p>Controversial Sources: Bullet C Conversion: Further guidance is needed to better define the term region. Also would suggest additional parameters related to conversion such as mitigation and the term legal and limited.</p> <p>Controversial Sources: General comment: Additional guidance should be given on how to access and determine if a source is controversial.</p>		Additional guidance for implementing the DDS is in SFI Section 7 - Guidance.
22	7.2.2	Clarity needs to be made that all exemptions are when procured from a supplier with a valid...not procured with a valid...	For example: Procured <u>from a supplier with a</u> valid SFI Section 2 (SFI Forest Management Standard ) certificate, or other acceptable forest management standards , that clearly indicates that the source is within the scope of the certification;	Edit addressed with 7.2.2.
23	7.3.2	Align with PEFC and use the terms Negligible and Significant		Comment considered but not accepted as it does not improve the requirement.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
24	7.5.3	Segregation is not a viable option and should be removed. See comments in FS 11.4.3		Comment addressed by 7.5.3.
25	7.6	Avoidance of Controversial Sources: There are no substantive additions to the definition of controversial sources.		Definition goes beyond strict legality. Definition aligns with the PEFC definition of controlled sources.
26	7.6.1	Avoidance is an absolute term and cannot be guaranteed additional verbiage should be added to address the reality that avoidance may not always be achieved.	Add:	26
27	8	Here we reference primary producer again and I thought this standard was for secondary producers. This is part of the confusion I believe regarding the applicability and necessity of this section for primary producers who are otherwise certified under the Fiber Sourcing and/or CoC standard. I think further clarification and consistency is needed ... or at least it is not clear to me and several other colleagues who are trying to figure out the interconnectiveness of these various sections in the standard. Perhaps a crosswalk depicting primary vs. secondary producers under various certification qualifications would help.		Comment addressed with 1.1 Scope.





Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
28	8.6.1	Clarify when a certify body's approval is required. If cannot clarify remove reference		Comment addressed with 8.6.1.
29	8.6.2 a.	<p>"Adequate knowledge" may not be sufficient here.</p> <p>Rather, the internal auditor shall be objective and impartial. The internal auditor shall not audit activities for which he/she is responsible for overseeing or participating in or for which he/she has any other conflict of interest.</p>	<p>The Certified OrganizationProgram Participant shall conduct the internal audit in accordance with the following requirements:</p> <p>a. The internal audit shall be undertaken by personnel that have adequate knowledge of the SFI 202215-2019 Fiber Sourcing StandardCertified Sourcing Standard ;</p> <p>b. The internal auditor shall be objective and impartial. The internal auditor shall not audit activities for which he/she is responsible for overseeing or participating in or for which he/she has any other conflict of interest.</p>	<p>Edit considered but not accepted as it does not improve the requirement.</p> <p>SFI Section 10 addresses auditor qualifications.</p>
30	8.6.2: c. & d.	C. and d. could be merged as illustrated in same clause within the CoC standard section as both are somewhat redundant.		Comment addressed with 8.6.2 c. and d.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
31	8.6.3	As illustrated in the CoC section earlier, the contractor shall also have to follow procedures provided by the certified company in order to be in compliance with respective requirements enabling the all-time control over the outsourced material.		Correct
32	8.6.3 - 8.6.8	In the CoC standard the outsourcing elements were separated out and that added clarity ... why were they not separated out here? Suggest keeping elements like this that are exactly the same between the CoC and Certified Sourcing Standard exactly the same which will make things more efficient for auditors and certificate holders. Same comments supplied for CoC outsourcing elements apply here also.		Comment addressed with 8.6.3 - 8.6.8.
34	8.6.3 b.	Remove the phrase physically separated and replace with Clearly identified.		Comment addressed by 8.6.3. b.
33	9.1	It will be helpful to state the corresponding contact address here.	Primary producers must annually submit to the Office of Label Use and Licensing (SFIReporting@sfiprogram.org) :	Edit addressed with 9.1.1.
3	General	Everything else in this standard is also found in Section 4 (CoC Standard).	Delete and discard the whole thing.	Noted



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
1	General	will new SFI certified source standard recognize PEFC and FSC towards the certified percentage.		FSC certified fiber is not recognized as meeting the definition of Certified Sourcing.  It could contribute to the 1/3 non-controversial required by secondary producers.
2	General	Certification systems can best serve the needs of the marketplace when they ensure that certificate holders are not intentionally or inadvertently misleading customers by being engaged or connected with highly controversial practices outside of their certified forests per se. While the SFI draft 2022 Fiber Sourcing Standard, and Certified Sourcing Standard should be reviewed carefully from this perspective, Canopy also recommends that the SFI adopt a system-level approach to this concern.	We recommends that the SFI: <ul style="list-style-type: none"> <li>Adopt system-level standards, policies, and procedures that preclude organizations from holding SFI certificates, if those organizations and affiliated entities are engaged in or associated with highly controversial practices outside their certified operations.</li> <li>At a minimum, these highly controversial practices should be understood to include: forest management that violates applicable laws; violations of Indigenous Peoples' rights or other peoples' civil rights; use of GMOs; conversion of natural forests to plantations and conversion of forests to non-forest land uses; degradation or destruction of RTE species'</li> </ul>	1st Bullet: SFI Certified Organizations must certify all their operations to the applicable SFI Standard or another PEFC endorsed forest management standard. 2nd Bullet: Practices cited as examples are not permitted under the SFI Forest Management Standard. 3rd Bullet: Examples cited can all be considered when implementing the DDS as required in Part 7 of the Certified Sourcing Standard.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
			<p>habitats, old growth, IFLs, and other RTE ecosystems.</p> <ul style="list-style-type: none"> <li>Recognize media coverage of highly controversial practices, or loss of certificates from other certification systems, as a trigger for conformance audits or higher-level investigations (e.g., by the national certifying body), so that it's not left to affected (and potentially vulnerable) stakeholders to file complaints.</li> </ul>	



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
3	1	Support inclusion of the global label/claim route		All SFI labels have been updated but the text "responsible harvesting" was not updated due to concerns that it could confuse the message behind the label.
4	1	Does this refer to companies that have both FM and CoC certificates? Or does this refer to companies that have several sites? Or does this refer to companies that have varies entities such as manufacturing, trading, distributing?		SFI has developed simplified language in part 3.1 and Appendix 1 that shows the SFI label(s) with the accompanying claim(s).
5	2	Support the reorganization and inclusion all here in Part 2		Noted
6	2.3	Shall it state rather "must" than "may"?	A label user must not use the SFI program label on any products from manufacturing unit(s) for which it has not obtained approval from the Office of Label Use and Licensing.	Part 1 applies to any organization that uses a SFI label or claim.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
7	2.17	It may be easier to provide an option where the supplier could get permission in writing by the purchaser to use the purchaser's SFI license code. See also 4.7 below. For that there shall be an agreement between the two companies assuring that the license code is only used for specific products part of agreement, the certifiers need to be informed, etc.		Noted
8	3.1	On page 106 one box is a copy of the preceeding box.		Edit accepted and text updated.
9	3.1	Note 6 and 10 seem to be redundant		Edit considered but not adopted. Current process remains in place.
10	3.1	There is far, far, far too much detail in this clause. Text seems to be seeking to explain rather than set a performance standard.	Radically simplify the normative language. Confine explanations in a separate guidance document that doesn't have to be audited.	Fixed.
11	3.1	"...must meet a 70% threshold which can be obtained by certified forest content, and/or recycled content." and "If...drops below the 70% threshold ...disclose the actual amount of...and/or recycled content on the label." This conflicts with footnotes 2, 6, & 10, which specify different thresholds for both CFC (10%) and recycled content (100%).	The defining thresholds need to be clear (they are not). Internal conflict needs to be resolved and removed.	Fixed.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
12	3.1	The draft On-Product Labels and Off-Product Marks Standard 3.1 SFI Chain of Custody Labels and Claims is missing the word that in the following sentence in the 2nd paragraph: There are two labels may be used by any chain of custody certified organization that uses the volume credit chain of custody method. The change is provided in the Proposed new language column	There are two labels that may be used by any chain of custody certified organization that uses the volume credit chain of custody method	Comment addressed with edits to 3.1.
13	3.1	<p>Section 5, clause 2.14 effectively eliminates the use of any CoC label for percentage-based claims with less than 10% CFC.</p> <p>My hypothetical example is one that I use repeatedly to demonstrate this: 99% recycled content 1% certified forest content This product may only be branded with a Certified Sourcing label, in spite of the fact that it contains no Certified Sourcing content.</p> <p>I've always considered this an unfortunate flaw in the standard (you may disagree of course), which is why I went looking for it in the new version. I find the 10% threshold repeated in footnotes 2,6, &amp;10 in the Label Matrix. But these seem to</p>		Comment addressed with edits to 3.1.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
		conflict with the 2nd paragraph is section 3.1.		
14	3.1	tables, and footnotes- As noted above, the details here are indecipherable. On balance, this draft is less comprehensible than the current standard. IMPORTANT NOTE: the opaqueness and complexity of SFI CoC label rules currently serves to encourage CoC companies to place the Certified Sourcing on all products - regardless of content. This seriously undermines the credibility of both programs (CoC and CS).		Comment addressed with edits to 3.1.
15	3.2	Redundant text between 1st and second paragraphs. Needs to be streamlined and simplified. Also recommend deleting reference to "certified forest" in the initial description of Fiber Sourcing ... s if it is from a certified forest most of the time that would be counted as SFI certified inputs given that SFI does not require logger CoC-certification.		Comment addressed with edits to 3.1.
16	3.3.3 a. viii.	How about those companies that do not want to use the SFI Label Recognizing Global Standards, yet, that want to sell the PEFC product with an SFI claim. Is this possible? Should this option be stated here as well?		Comment addressed with edits to 3.1.





Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
17	3.3.3 b ii.	Typo: "aAnd"		Comment addressed with edit to delete reference to 'certified forest content'. Text now reads 'certified content'.
18	4.2	Provide email address for the SFI Office of Label Use and Licensing.		Certified forest content from the ATFS and/or CSA Z809 Standard is an eligible input to a SFI Chain of Custody. Both these standards are PEFC endorsed.
19	4.7	4.7 could be added to or stated in lieu of 2.17 above.		Noted
20	5.2 c. i.	In addition to "respect" also, eg., "support" could be used.	i. SFI respects and supports Indigenous Peoples' rights and traditional knowledge and promotes forest-focused collaboration to support certification.	OLUL email is in part 8.11.
1	General	We are moving to <a href="http://www.forests.org">www.forests.org</a> which will eventually replace <a href="http://www.SFIprogram.org">www.SFIprogram.org</a> . With this, labels will need to be updated. Because of that, now is the time to bring that up with the label task group. I don't think we should change claims on the COC labels, but we've had this conversation about certified sourcing. A potential new claim could be "Responsible Harvesting." Maybe there are others, but please make		Comment considered but not accepted as it does not improve the requirement.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
		sure this goes into the comments so we don't forget.		
2	General	Hard to track what has changed given the movement of text - it would have been helpful if SFI flagged what, if any, changes were made to the footnotes and specifics re: label use as this is very complex and a frequent source of customer/sales questions.		Edit accepted.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
1	1	Forest Management Planning: Control of Decision Making- good clarification regarding Mining and drilling activities		Noted.
2	1	Forest Management Planning: Accounting for Non-Certified Forest Content- appreciate clarification re small parcels of land that may remain in scope such as right-of-ways, well drilling pads.		Noted.
27	1.2.1	Would be helpful to include a few examples of different ways and reasons that Certified Organizations might organize these assessments when they have an ecologically diverse supply area.		Comment addressed by SFI Section 7 Guidance: Conversion of One Forest Cover Type to Another Forest Cover Type
28	1.2.1	Suggest including language in guidance that non-forest based and aquatic species need not be included. Indicate that aquatic species are generally addressed via BMP compliance.		Comment addressed by SFI Section 7 Guidance: Conversion of One Forest Cover Type to Another Forest Cover Type
26	1.2.2	There appears to be some disconnect between the intent of sections 2 and 7. The example with southern bottomland hardwoods vs. loblolly pine plantations gives the impression that conversion is acceptable: 'Such conversion could be allowable under limited circumstances, if justified for economic reasons, provided that such conversion would not put native forest cover types, or FECVs, at risk.'	Clarify the contents of section 2 and section 7 to avoid different interpretations	Comment addressed by SFI Section 7 Guidance: Conversion of One Forest Cover Type to Another Forest Cover Type



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
29	2	The guidance says this indicator is new ... but its merely just moved/re-orderded. I think this guidance is old from when this was originally added and the word "new" should be deleted so we don't give the impression that BMP compliance for stumpage sales / fiber sourcing is new.		Noted.
3	2.2.5	The potential exists for Indicator 2.2.5 to be applied differntly by different CBs, e.g. varying degrees of interpretation regarding the absence of "other viable alternatives".	Consider approval of variances from the prohibition of WHO type 1 and type 2 pesticides to reside with SFI rather than CABs.	Edit considered but not accepted as it does not improve the Guidance. Certification Bodies are best positioned to have the required context to evaluate the request being familiar with the operations and the forest pest for which this pesticide is requested. Only 3 companies have a variance for the use of a WHO 1A/1B pesticide (rodenticide). This number has been static for the last 6 years.



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30	4	The new guidance, while well intentioned, was not drafted from the perspective of an operational forest manager. We strongly encourage revising the entire guidance section, both for clarity and for examples more in keeping with operational forest management for multiple values	Rewrite entire new guidance	No edits proposed.
31	4	we have concerns about any reference to IUCN - we need go no farther than remind SFI about how IUCN ranks longleaf pine	remove reference to IUCN Red List	Edit considered but not accepted as it does not improve the Guidance.
36	4	...involve the element (e.g., competition and disease).	...involve the element (e.g., competition and pests). Note that we suggest to add "pest" as a definition so that it is clear to the reader that it includes insect and disease.	Edit considered but not accepted as it does not improve the Guidance.
37	4	...forest health and productivity (e.g., high growth rates, drought resistant, disease resistance) of planting or regeneration stock...	"...forest health and productivity (e.g., high growth rates, drought resistance, pest resistance) of planting or regeneration stock..."	Edit considered but not accepted as it does not improve the Guidance.
38	4.1	Lack of clarity regarding credible sources of scientific information	Use the term 'best scientific information' instead of 'credible source of scientific information'	Comment addressed by SFI Section 7 Guidance: Conservation of Biological Diversity
39	4.1.5	we have strong concerns with replacement of "viable occurrences" with "ecologically important species"	Revise to keep concept of viable populations and viable natural communities. Certified organizations should not be required to expend resources over one isolated species	Comment addressed by SFI Section 7 Guidance: Ecologically Important Species



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
			individual, a few random individuals or a small natural community	
40	4.1.7	In the report it indicates: "According to the U.S. Department of Agriculture Animal and Plant Health Inspection Service, invasive species are "any species, including its seeds, eggs, spores, or other biological material capable of propagating that species, that is not native to that ecosystem, whose introduction does or is likely to cause economic or environmental harm or harm to human health.""	Instead of providing an American or Canadian definition, I would suggest that an international definition be used, such as one from International Plant Protection Convention. I would also ensure that this international definition is used in the SFI Definitions Section at the end of the report.	Edit considered but not accepted as it does not improve the Guidance.
70	6.1.6	Need to maintain flexibility for untrained loggers (e.g., small providers, salvage) and not be penalized for fluxuations in % trained loggers. Could have a lower % one year due to high salvage recovery. Focus on the method/program for high % logger training, and not on actual numbers.		Comment addressed by SFI Section 7 Guidance: Use of Qualified Logging Professionals, Qualified Resources Professionals and Certified Logging Companies; Expectations for On-site Supervision by Qualified Logging Professional



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
19	6.1.6 c	Guidance states that a site-level risk assessment must be conducted by a Qualified Logging Professional (QLP) to determine how much time is needed on site. There are a couple of different concerns with this from the Fiber Sourcing perspective. First, how should this QLP on site assessment be documented? Second, what type of verification would be acceptable confirmation that the QLP was in fact present for the stated amount of time? Last, but not least, how might this verification process be possible for gatewood purchases given the fact that certified organizations do not have oversight of gatewood harvest activity?	Remove this guidance from the Fiber Sourcing Standard and remove part c of 6.1.6 in the Fiber Sourcing Standard.	Edit considered but not accepted as it does not improve the Guidance.
16	6.3.1.i	The referenced indicator applies to Certified Logging Companies. Need clarity and delineation on the risk evaluation to determine what constitutes "regular" for an employee of a certified logging company to be on-site risk. 1). Who is required to conduct a site risk evaluation? 2). Confirm that this risk evaluation only applies to Certified Logging Companies and MAYBE to QLP's at FM sites. Recommend that this requirement not apply to QLP's in the FS standard (would be too onerous to manage).		Comment addressed by SFI Section 7 Guidance: Expectations for On-site Supervision by Qualified Logging Professional and Certified Logging Companies



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17	6.3.1.i	If this requirement is kept in the FS standard, need clarity around what is required in the assessment? Will this have a required format. Would logger interview suffice? If you have a daily on-site requirement or a 4 day a week requirement, do you still need an assessment?	Can we adjust this language to give Certified Organization the flexibility to set a minimum on-site day requirement OR conduct an assessment that would otherwise determine required level of "on-site" presence	Comment addressed by SFI Section 7 Guidance: Expectations for On-site Supervision by Qualified Logging Professional and Certified Logging Companies
43	8	"...affected Indigenous communities..." is this the same as "Indigenous Peoples"?	Utilize clear language/terminology.	Comment addressed by SFI Section 7 Guidance: Communications with Indigenous Communities
44	8	Guidance should reflect in some cases, Indigenous Peoples have no desire to consult with Certified organizations	Add a paragraph acknowledging in some instances, Indigenous Peoples have no desire to consult with Certified Organizations, and in those situations, documentation of attempts to establish a dialogue will be seen as evidence of meeting the intent of the Objective	Comment addressed by SFI Section 7 Guidance: Communications with Indigenous Communities
45	8	Not all jurisdictions consult and engage consistently and a certification standard should raise the bar beyond the lowest regulations required by a jurisdiction.	Suggest that additional guidance on Indigenous Peoples' rights should include definitions (since this is an international standard) and provide overarching guidance beyond simply pointing the certified organization to the jurisdiction and their	Comment addressed by SFI Section 7 Guidance: Communications with Indigenous Communities





Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
			policies/requirements for Consultation and engagement.	
46	8	It would be most helpful if SFI incorporate into the guidance here for this objective; links for the UN document and any provincial, regional, state or local laws would good as a starting point.		Incorporating links to existing legislation would require that SFI monitors all applicable US and CDN pieces of legislation / regulation. This is the responsibility of the certified organization as it pertains to their region, state, or province of operation.
47	9	Climate Smart Forestry - There will be a variety of factors to consider for this Objective - private/public land, size, governance etc. Would also expect that the level of detail of evidence will grow over time. In addition to guidance for the certified organization, there needs to be guidance provided for the auditors.	Include guidance for auditors on intent, level of detail expected for this new objective.	Guidance is developed for the use of the Certified Organizations. In the Introduction to SFI Section 7 Guidance it is clear that Guidance is not intended to be normative.
48	9	Add "reducing insect and disease risk" in the 2nd sentence of the 3rd paragraph in the list of management objectives.		Edit considered but not accepted as it does not improve the Guidance.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
49	9	The concern I have is that while these Performance Measures are laudable, developing a "Program" identified in PM 9.1 and PM 9.2 could be very time consuming. I would like SFI to develop guidance relating to how extensive the program needs to be in order to adequately address Objective 9. I have seen Programs and analyses relating to Climate Change that are hundreds of pages long. I would hope that the analysis and action plan could be considered adequate using a much more succinct format.		Comment addressed with the edits in SFI Section 2 - Forest Management Standard, PM 9.1 and PM 9.2.
50	9	In the guidance for 9.2.1 and 9.2.2, it mentioned that for larger organizations it will be easier for them to conduct GHG inventories. However, the larger the Organization the more complex and varied their operations are likely to be increasing the complexity of conducted GHG assessments. Request updating this language to give flexibility to organizations regardless of their size.		Comment addressed with the edits in SFI Section 2 - Forest Management Standard, PM 9.1 and PM 9.2.
51	9	Add "reducing insect and disease risk" in the 2nd sentence of the 3rd paragraph in the list of management objectives.		Comment addressed with the edits in SFI Section 7 Guidance, Indicators 9.1.2 and 9.1.3 — Identifying Adaptation Strategies Indicator and 9.2.3 — Quantifying GHG emissions in forest management operations.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
52	9	Remove the language "harvest removals" from the last paragraph of Object 9 guidance intro. The way this is written makes it seem like GHG emissions and harvest removals are both emissions sources. We know that harvested logs, especially those that are turned into long-lived wood products, serve as long-term carbon sinks. The calculation of carbon associated with these seems outside of the scope of the FM standard. The calculation of our sustainable harvest levels ensures that we are maintaining consistent in-woods carbon stocks.	It is important to note that the scope and scale at which certified organizations may address some of these objectives will depend on the size and complexity of their operations. For example, larger forest land owners and managers may have the capability to conduct a more complex inventory of greenhouse gas emissions and harvest removals whereas it is reasonable to expect that smaller land owners and managers can make use of regional averages for greenhouse gas emissions and harvest removal estimates for purposes of developing an adaptation strategy and mitigation plans.	Edit considered but not accepted as it does not improve the Guidance. The issue of size and complexity is addressed in several places in the Guidance for Objective 9-Climate Smart Forestry.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
53	9	<p>We liked how the standard addresses climate change. It calls on the certified company to do an assessment of risks and opportunities and identify the priority actions. It also adds climate change impacts as a reason for deviating from other key objectives, such as no stand conversions, providing the certified company identifies the research behind the decision and they are following regulations.</p> <p>The standard clearly identifies the need to address climate change and has built in flexibility to account for impacts when needed.</p>		Noted.
54	9	Suggest changing wording around maintaining productive or growing forests (varying wording throughout) to say "forest ecosystems" (add ecosystems). This wording better encompasses significant carbon pools within the forest ecosystem outside of above ground biomass (e.g.: soil pools, sediment pools, wetlands, etc all part of healthy forests)	"forests" to "forest ecosystems" when discussing carbon pools and fluxes	Edit addressed in the Guidance for Objective 9- Climate Smart Forestry where carbon fluxes or carbon pools are discussed.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
55	9.1	"Risks and vulnerabilities that result from climate change impacts on managed forests and the values within them will vary from region to region and across forest stand types and ages. This variation may include differences in effects on tree mortality, forest infestation, "tree growth rates (both positive and negative)", wildfire, and species distributions."	Recommendation: Add "tree growth rates (both positive and negative)"	Edit considered but not accepted as it does not improve the Guidance.
56	9.1	The citations in this paragraph, and throughout the document, are inconsistent with standard practices. I suggest using APA or even MLA guidelines, and using them consistently throughout the document. Upitt has a good reference webpage about the different styles. <a href="https://pitt.libguides.com/citationhelp#:~:text=F%20example%3A,History%2C%20and%20the%20Fine%20Arts">https://pitt.libguides.com/citationhelp#:~:text=F or%20example%3A,History%2C%20and%20the% 20Fine%20Arts</a>	Reformat citations to consistently use one style throughout.	Noted.
57	9.1	no referral to collaboration at the SIC level	include that collaboration at SIC level would be an appropriate level id of climate changes risks, prioritization and adaptation plans.	Edit addressed with PM 9.1 and PM 9.2 of SFI Section 2 - Forest Management Standard.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
58	9.1.1	Suggest also including climate change impacts that may provide economic opportunities (or status quo).  (Justification: In COVID- and other economically difficult times, these may be the only feasible adaptation options for struggling forestry organizations)	Change to "Indicator 9.1.1 requires certified organizations to conduct an assessment to prioritize identified climate change risks and potential opportunities"	Edit considered but not accepted as it does not improve the Guidance.
59	9.1.2	If previous comment on economic opportunities would be accepted, please adjust text accordingly throughout section 9.1, including title sentences.	For instance, change titles 9.1 and 9.1.1 to include "...Risks, Vulnerabilities and potential Opportunities"	Edit considered but not accepted as it does not improve the Guidance.
60	9.2	Need to add in Performance Measure 9.2 above Indicator 9.2.1	Add text: "Performance Measure 9.2. Certified Organizations shall have a program to identify and address opportunities for climate change mitigation associated with its forest operations."	Edit made - formatting issue in May 2020 draft of the SFI Guidance.
63	9.2	Guidance for PM 9.2 speaks to Quantifying GHG emissions - the goal was to understand the source of emissions, not quantify levels. This is at odds w/ wording in the 9.2.2.	Remove reference to Quantifying GHG emissions replace with Addressing GHG emissions	Edit considered but not accepted as it does not improve the Guidance.
64	9.2	We strongly believe the SFM Standard is not the right place to address GHG emissions. The guidance reinforces this belief. As landowner, it is simply not our purview to mandate or even document age of equipment or GHG emissions from a 2016 John Deere vs a 2019 Caterpillar	Delete 9.2 and all Guidance that refers to 9.2	Edit considered but not accepted as it does not improve the Guidance.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
		Skidder. Moreover, the resources required to even develop programs or evaluate GHG emissions following the logic set forth in the Guidance adds costs and complexity in return for the optics that SFI is making a tangible difference. Third, this is well beyond both letter and intent of PEFC Framework. This is not the place to drive a stake in the sand that SFI is doing more than other certification systems		
65	9.2	Small change to text so that it sounds more like an indicator.	Change to: "Indicator 9.2.2 - Quantify GHG emissions in forest management operations"	Edit addressed with Indicator 9.2.3 — Quantifying GHG emissions in forest management operations in SFI Section 7 Guidance.
61	9.2.1	Be consistent with suggested definition of Indicator 9.2.1. (see Forest Management Section, Indicator 9.2.1. suggestion)	Change to "Indicator 9.2.1 - Identify and address options to enhance carbon sequestration and reduce GHG emissions associated with forest management operations"	Edit considered but not accepted as it does not improve the Guidance.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
62	9.2.2	<p>Examples of the Indicator focus only on reducing forestry operation GHG emissions:</p> <ul style="list-style-type: none"> <li>• Consideration of equipment age, operability and maintenance;</li> <li>• Selecting the correct equipment size (most efficient machine for the job);</li> <li>• Finding alternative uses for logging waste to minimize open burning; and/or</li> <li>• Modifications to site preparation techniques."</li> </ul>	Suggest also bringing in a focus on carbon sequestration (improved growth rates, reforestation and/or afforestation, silvicultural activities to limit the impacts from wildfire, disease or forest pests, etc)	Edit addressed with Guidance - Indicator 9.2.1 - Identify and address options to enhance carbon sequestration and reduce GHG emissions, and PM 9.2 of SFI Section 2 - Forest Management Standard.
67	9.2.1/9.2.2	<p>In the guidance for 9.2.1 and 9.2.2 it mentioned that for larger organizations it will be easier for them to conduct GHG inventories. The larger the Organization the more complex and varied their operations are likely to be increasing the complexity of conducted GHG assessments. Request updating this language to give flexibility to organizations regardless of their size.</p>		The issue of size and complexity is addressed in several places in the Guidance for Objective 9- Climate Smart Forestry.
66	9.2.2	<p>Clarify the Indicator's support text: "Sources of models and tools to quantify local, regional and national level forest carbon storage that may assist in addressing carbon storage or emission calculations are available from a variety of sources."</p>	Change to: "Sources of models and tools to quantify local, regional and national level forest carbon balance that may assist in addressing GHG emissions and removals in forest management operations are available from a variety of sources."	Edit addressed with Indicator 9.2.3 — Quantifying GHG emissions in forest management operations in SFI Section 7 Guidance.





Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
68	9.2.2	Update reference to definition in AR5-2014 (Mitigation of Climate Change) and add phrase that speaks to the most relevant to forest industry, which is carbon sequestration (altering the radiation balance)	...,but also measures that can directly alter the radiation balance or control emissions.	Comment addressed with the removal of the definition from SFI Section 7 - Definitions. The term 'mitigation' is defined in SFI Section 14 - Definitions.
69	10	Regarding the reference to the US Lacey Act and EU Timber Regulations: Canada's illegal logging legislation is contained in the Wild Animal and Plant Protection and Regulation of International and Interprovincial Trade Act (WAPPRIITA) and the associated Wild Animal and Plant Trade and Protection Regulations (WAPTR).	Addition: The Canadian legislation that prohibits illegal import and acquisition of illegal wildlife specimens, including forest products, is contained in the Wild Animal and Plant Protection and Regulation of International and Interprovincial Trade Act (WAPPRIITA) and the associated Wild Animal and Plant Trade and Protection Regulations (WAPTR).	Noted. The CDN legislation (WAPPRIITA & WAPTR) are addressed under Forest Management Standard PM 11.1.
71	12	CLC's should be required to meet QLP requirements, and the SFI core training information is provided to them. CLC would already be in conformance with the SFI standards under the QLP requirements. With such requirement in place, the role of Certified Logging Programs is ambiguous. While a well-designed and administered program would certainly result in benefits on the ground, a less rigorous program would place SIC's in the position to prove/disprove the merits of the CLP, which takes away from their core function of	We recommend that Certified Logging Programs stand on their own merit, independent of SFI, by having all references to Certified Logging Programs and their endorsement as a mechanism that stands in any way in lieu a prescribed training program removed from the SFI Standards and Rules.	Edit considered but not accepted as it does not improve the Guidance.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
		<p>training.</p> <p>Some states do not have CLP's as an option for workforce development/job performance verification within their regions. Job performance verification is a valuable tool in elevating the professionalism of the logging industry and recognizing benefits for the resource. An ideal program would require both standard core training and an element of ground verification of practices; however, there would need to be a mechanism in place for consistent evaluation of ground performance which does not place the burden upon local SIC's unless they are adequately supported to do so.</p> <p>With CLC's requiring or accepting different trainings causes another issue for the SIC to track an individual's training records. The SIC continually struggles with individuals that need training to keep their qualifications up to date. With the addition of the CLP requirements the SIC will face even greater difficulty tracking training qualifications.</p>		
72	12	Delete and remove references to CLC concept - see comments supplied in other tabs/sections.		Edit considered but not accepted as it does not improve the Guidance.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
21	12	<p>"On-site regularly": Understand the intent but this needed to be vetted by the Fiber Sourcing Committee so that specific wording that has led to confusion and a perceived "backslide of logger training requirements" could have been addressed/avoided. Needs some tweaking, specifically sentences that suggest regular on-site supervision is not needed. This would be a major departure and weakening of one of the huge successes of SFI. Edit to remove suggestion that 'on-site regularly' is not required but rather focus flexibility on the defining what 'regularly' means based on complexity of site. Sentence that seems to be creating issues is in the middle and reads "When assessing wheather a logging site needs a trained supervisor "onsite regularly" ... I would rephrase this to read " when quantifying / defining what 'regularly' means for a particular job ... take into consider the knowledge of ..."</p> <p>Also, absolutely do not agree that it should be up to the logging company/supervisor to conduct the "risk assessment" but rather in consultation with teh forester/landowner/landmanager as well (can we use a different phrase - this is commonly used and has specific connotations that I don't think we mean here ... perhaps we mean "complexity analysis" or something like that).</p>	<p>remove flexibility for logging company/supervisor to solely at their own discretion define what "regularly" means.</p> <p>Use a different phrase other than "risk assessment."</p> <p>Don't suggest that on-site regularly is no longer required, rather outline flexibility for teh application and quantificatinon of that phrase.</p>	Comment addressed by SFI Section 7 Guidance: Expectations for On-site Supervision by Qualified Logging Professional and Certified Logging Companies



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
13	12.3.1.i	These two referenced indicators apply to Certified Logging Companies. Need clarity and delineation on the risk evaluation to determine what constitutes "regular" for an employed of a certified logging company to be on-site risk. 1). Who is required to conduct a site risk evaluation? 2). Confirm that this risk evaluation only applies to Certified Logging Companies and QLP's at FM sites.		Comment addressed by SFI Section 7 Guidance: Expectations for On-site Supervision by Qualified Logging Professional and Certified Logging Companies
14	12.3.1.i	Need clarity around what is required in the assessment? Will this have a required format. Would logger interview suffice? If you have a daily on-site requirement or a 4 day a week requirement, do you still need an assessment.	Can we adjust this language to give Certified Organization the flexibility to set a minimum on-site day requirement OR conduct an assessment that would otherwise determine required level of "on-site" presence	Comment addressed by SFI Section 7 Guidance: Expectations for On-site Supervision by Qualified Logging Professional and Certified Logging Companies
15	12.3.1.i	It would be helpful to understand more what evidence would be expected to demonstrate "on-site" regularly. Would logger interviews suffice as they have in the past?		Comment addressed by SFI Section 7 Guidance: Expectations for On-site Supervision by Qualified Logging Professional and Certified Logging Companies



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
35	Conservation of Biodiversity	Aux États-Unis et au Canada, les organisations certifiées SFI peuvent se servir de la base de données NatureServe pour déterminer les espèces et les communautés à protéger. Plutôt que d'établir des listes d'espèces à protéger différentes d'un organisme à l'autre nous suggérons de baser les espèces et communauté à protéger sur les programmes de rétablissement du gouvernement fédéral canadien.	Au Canada, les organisation certifiées SFI peuvent se servir des espèces identifiées comme étant menacées ou en danger selon la Loi sur les espèces en péril et dont l'habitat a été identifié conformément à sa Stratégie de rétablissement. Pour les petites forêts privées, des démarches sont entreprises pour informer les propriétaires ou les entrepreneurs forestiers de la présence d'habitat essentiel sur leur lot.	Noted.
41	NatureServe Resources	I know that our state natural heritage programs assess the viability of element occurrences. I assume that NatureServe does not replicate this effort, but simply receives and compiles information from the states and provinces. I am unaware of a mechanism for requesting this occurrence data from NatureServe. SFI training sessions in the efficient use of NatureServe biodiversity data would be welcome!		Comment addressed by the many reference of NatureServe in SFI Section 7 Guidance - Objective 4. Conservation of Biological Diversity. Also, Forest Management Standard Ind. 6.2.2 d., requires training in awareness of rare forested natural communities as identified by organizations like NatureServe.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
11	Use of Qualified Logging Professionals and Certified Logging Companies	are there any requirements or guidance for the internal training that a "certified company" would have to provide to its own employees? if none, that could result in a huge decline in the real number and amount of trained professionals		Comment addressed by SFI Section 7 Guidance: Use of Qualified Logging Professionals, Qualified Resources Professionals and Certified Logging Companies, and Certified Logging Companies
12	Use of Qualified Logging Professionals and Certified Logging Companies	Has a maximum number of crew members or crews supervised by a given individual supervisor been considered?		Comment addressed by SFI Section 7 Guidance: Expectations for On-site Supervision by Qualified Logging Professional
4	Use of Qualified Logging Professionals	The Guidance says "The SFI 2022 Fiber Sourcing Standard indicator 6.1.5 says that Certified Organizations will use written agreements requiring the use of qualified logging professionals." but indicator 6.1.5 of the F.S standard does not actually say that.	Change the Guidance to say "The SFI 2022 Fiber Sourcing Standard indicator 6.1.5 says that Certified Organizations shall have written agreements for the use of qualified logging professionals"	Edit addressed by SFI Section 7 Guidance: Use of Qualified Logging Professionals, Qualified Resources Professionals and Certified Logging Companies



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
76	SIC Participation	Why is SFI SIC only for wood product facilities or forestland managers? SIC participation should be open to harvesting companies as well. All SFI program participants Certified Organizations owning and/or operating forest product facilities, owning and/or managing forestland, or procuring fiber within the state or province are expected to participate in the SFI Implementation Committees (SICs).	All SFI program participants Certified Organizations owning and/or operating forest product facilities, owning and/or managing forestland, or harvesting fiber, or procuring fiber within the state or province are expected to participate in the SFI Implementation Committees (SICs).	Edit addressed by SFI Section 7 Guidance: SFI Implementation Committee Participation
77	SIC Mission	b. Inconsistent Practices- Establish Protocol for addressing, investigating, and responding, to SFI Standard nonconformity allegations and inconsistent practices and allegations regarding non-certified organizations forest management practices.	This seems like an extreme overreach and should be deleted or amended. Or focus on certified organization lands. There may be legal restrictions if SFI SIC's investigate private landownership practices without permission. Seems relevant to be in the scope of SIC for Certified Orgs. though.	Edit considered but not accepted as it does not improve the Guidance.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
5	Use of Qualified Logging Professionals and Certified Logging Companies	New guidance in the draft seems to indicate the removal of the one person per crew language and move more toward putting the onus on the logger to determine their willingness to risk the supervision level of their jobsites. This is a dilution of the standard. This returns us to the standard wherein the company has one person (owner or representative) who as long as they are trained, meet the requirements to deliver trained wood. However, it eliminates the harvest operation supervision on a daily basis allowing "brokers" who purchase wood and subcontract the harvesting to be trained, but the people doing the on the ground work not meeting the training. It is understood that a supervisor may not be onsite 100% of the time, but the definition of onsite regularly is too vague. Should have someone trained onsite while operations are occurring to prevent daily issues. If one has to run for parts, a secondary supervisor should be available. Exp: Currently we have people with 6 crews and one trained person.		Edit addressed by SFI Section 7 Guidance: Use of Qualified Logging Professionals, Qualified Resources Professionals; Expectations for On-site Supervision by Qualified Logging Professional and Certified Logging Companies
6	Use of Qualified Logging Professionals and Certified Logging Companies	Regarding on site responsibilities for trained loggers, was there any discussion on including safety as one of those risks to be considered with others listed?		Logger safety is addressed in SFI Section 2 - Objective 13 and SFI Section 3 Fiber Sourcing Standard Objective 6.





Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
7	Use of Qualified Logging Professionals and Certified Logging Companies	For the purposes of verification, would the risk assessment and determination of required frequency of onsite supervision have to be documented?		Comment addressed by SFI Section 7 Guidance: Expectations for On-site Supervision by Qualified Logging Professional and Certified Logging Companies
8	Use of Qualified Logging Professionals and Certified Logging Companies	Will the supervisor's assessment of level of 'presence on site' be documented in writing? Or can an FM certificate holder request documentation?		Comment addressed by SFI Section 7 Guidance: Expectations for On-site Supervision by Qualified Logging Professional and Certified Logging Companies
9	Use of Qualified Logging Professionals and Certified Logging Companies	With respect to a logging site supervisor assessing risk on a site for determining the amount of time a trained logger/supervisor be on site, would this be evaluated through a verbal discussion or would some sort of documented assessment be required? I have concerns over the ability to manage documented assessments over all potential sites supplying mills.		Comment addressed by SFI Section 7 Guidance: Expectations for On-site Supervision by Qualified Logging Professional and Certified Logging Companies
10	Use of Qualified Logging Professionals and Certified Logging Companies	Where a company planner assesses the risks (as you listed) on a logging site and provides the information to the qualified logging professional is the assessment by the QLP/CLP necessary or should awareness be sufficient?		Comment addressed by SFI Section 7 Guidance: Expectations for On-site Supervision by Qualified Logging Professional and Certified Logging Companies



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
18	FS Guidance on Trained/Certified Loggers	If this requirement is kept in the FS standard, it would be helpful to understand more what evidence would be expected to demonstrate "on-site" regularly. This is especially complicated for procuring gatewood. Would logger interviews suffice as they have in the past?		Comment addressed by SFI Section 7 Guidance: Expectations for On-site Supervision by Qualified Logging Professional and Certified Logging Companies
20	Expectations for on-site supervision of QLP and CLC	Expectations for On-site Supervision by Qualified Logging Professional or Certified Logging Company SFI 2022 Forest Management Standard Indicator 12.3.1 i. and SFI 2022 Fiber Sourcing Standard Indicator 6.1.6 c. and 6.3.1 i. require that a logging crew is supervised by an individual who "has direct responsibility and is on-site regularly to consistently carry out the roles and responsibilities of the wood producer". It is understood a logging crew will not be under the supervision of a qualified logging professional or certified logging company at all times given the additional responsibilities that can be placed on the supervisor such as dealing with equipment failures, etc. Also, it is understood that the environmental and legal risks inherent with a logging site can vary. When assessing whether a logging site needs a trained supervisor "onsite regularly" it is the knowledge of such risks that needs to be assessed and taken into account. For a site with high biodiversity or water quality values, or a complicated harvest unit boundary, it is reasonable to expect regular onsite supervision of the crew. The principal of the logging company or his representative should be	In regards to the red font- CLC does need to be included in the exceptions as written. I would recommended this be re-written. A CLC covers this. The logging employees/crew are employed by the CLC. By recognizing the CLC you are effectively recognizing the entire crew and the owners/principals ability to handle difficult situations that occur on their own private stumpage sales. This would greatly decrease the amount of duplication in the standard. <b>INCLUDE CLC IN THE SCOPE OF THE STANDARD</b>	Comment addressed by SFI Section 7 Guidance: Expectations for On-site Supervision by Qualified Logging Professional and Certified Logging Companies. Additionally, Certified Logging Companies are referenced in PM 13.1 of the Forest Management Standard and PM. 3.1 of the Fiber Sourcing Standard.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
		sufficiently knowledgeable about the harvest unit and its harvest plan to do this risk assessment. Using this assessment, the contractor principal or his representative can determine the level of onsite supervision required to consistently carry out the roles and responsibilities of the wood producer or if additional trained supervisors are required on the harvest site.		
22	Expectations for On-site Supervision by Qualified Logging Professional or Certified Logging Company	The NH SIC beleives it is the intent of the standard for the owner of the logging company or their representative to determine the appropriate level of oversight required on a site by a qualified logging provessional. Please add language clarifying/affirming it is <b>not</b> the certified organization's obligation to determine if the qualified logging professional or certified logging company has satisfied the "on-site regularly" aspect of this requirement.	Add language as suggested in the comment.	Comment addressed by SFI Section 7 Guidance: Expectations for On-site Supervision by Qualified Logging Professional and Certified Logging Companies
23	Conversion of One Forest Cover Type to Another Forest Cover Type	This would require re-working if my changes to PM 1.2, Indicator 2 were adopted.	I would be willing to help re-draft if my proposed changes are implemented.	Noted.
24	Conversion of one forest type to another	Second sentence has the newly updated & defined term "ecologically important" but the term isn't italicized (indicating it's in Definitions).	Italicize "ecologically important" throughout the document.	Noted.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
32	Conservation of Biodiversity	First paragraph says "best available scientific information"; the second paragraph says "best scientific information."	Consistently use "best scientific information" or very clearly explain why "best available scientific information" is being used instead.	Noted.
73	SFI Due Diligence System for Assessment Risk of Sourcing from Controversial Sources	Amend the first paragraph to exclude the United States and Canada from having to conduct a risk assessment for fiber sourced from within the United States and Canada. Again, the Guidance Section states that the US and Canada already have a "strong legal framework which Certified Organizations must abide by" so why is it necessary to conduct a risk assessment if the framework already exists to avoid Controversial Sources.		Edit considered but not accepted as it does not improve the Guidance.
74	SFI Due Diligence System for Assessment Risk of Sourcing from Controversial Sources	The 1% threshold over a 10-year period is too low, it should be 2% or greater. I suggest 5%, which would equate to an annual average of 0.5%. - And it should be qualified that exceeding the threshold must be "statistically significant at the 95% probability level."		Comment addressed by SFI Section 7 Guidance: Diligence System for Assessment Risk of Sourcing from Controversial Sources
75	SFI Due Diligence System for Assessment Risk of Sourcing from Controversial Sources	SFI Inc. should consider being responsible for defining "regions" and calculating and publishing the numbers for countries and regions.		Comment addressed by SFI Section 7 Guidance: Diligence System for Assessment Risk of Sourcing from Controversial Sources



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
25	Conversion of one forest type to another	Last paragraph, starting "1.2.2d notes the need for "appropriate consultation"..." but does not explicitly describe/define "appropriate consultation," especially given the caveat that the " <i>Certified Organization</i> may determine to forego consultation."	Define "appropriate consultation."	Comment addressed by SFI Section 7 Guidance: Conversion of One Forest Cover Type to Another Forest Cover Type
33	Conservation of Biodiversity	Last sentence of second paragraph uses the term "credible sources" twice.	Remove the second instance of "credible sources" at the end of the sentence.	Noted.
34	Conservation of Biodiversity	Second to last paragraph of page 135, first sentence: "Another credible prioritization effort..."; also last paragraph, first sentence "...elements of credible analyses..."; First full paragraph of page 136, first sentence: "An advantage of using credible planning..."	Define "credible" in Definitions or remove throughout.	Task Group decided not to define but to place reliance of the term 'best scientific information'. See SFI Section 14 - Definitions.
42	Ecologically Important sites	Newly updated & defined term "ecologically important" is used throughout this section but the term isn't consistently italicized (indicating it's in Definitions).	Italicize "ecologically important" throughout the document.	Noted.

**Section 8: Policies: No Comments Received**



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
1	1.2iv	iv. Improvement – periodic review of SFI standards seeks continual improvement and to ensure the standards continues to meet expectations of stakeholders.	I think meeting the expectations of stakeholders has not been met. Certified Logging Companies (stakeholders) have been asking for increased participation since the 2010 revision. A 2007 White Paper by Phoenix Strategies concludes that SFI should include Master Logger Programs (CLC) yet nothing has been done to further this. I think its important for SFI to follow through with its standard in terms of continuous improvement. CLC stakeholders are expecting more. <b>INCLUDE CLC IN THE SCOPE OF THE STANDARD</b>	Comment addressed with new definition of 'Certified Logging Company' and edits in the Forest Management Standard Objective 12 and the Fiber Sourcing Standard Objectives 3 and 6



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
7	Introduction	The CB accreditation requirements are: ISO/IEC 17021-1: and ISO/IEC TS 17021-2 for Forest Management and Fiber Sourcing. I suggest leaving out the year and make statement that latest version to be utilized.	Please revise all references in any section to the correct standard number.	Noted. ISO standards reviewed to ensure correct nomenclature.
8	1	Correct standard references.		Noted. ISO standards reviewed to ensure correct nomenclature.
9	2	Correct standard references.		Noted. ISO standards reviewed to ensure correct nomenclature.
10	2	Suggest including IAF MD 2 (which is for transfer of accredited certification). It is an example list but many are referenced so might as well include others.	.... And International Accreditation Forum (IAF) Mandatory Documents (E.g., IAF MD 1, 2, 4, 5, 11, etc.)	Edit accepted - IAF MD-02 added.
3	3.1.2 d. submit to the certification body a request for extension or reduction of the certification scope, including coverage of participating sites;	A time frame for submittal could be set here.	d. submit to the certification body a request for extension or reduction of the certification scope, including coverage of participating sites within 5 business days;	Edit considered but not accepted as it does not improve the requirement.





Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
4	3.7.1: Additional sites may be added by the certification body to an existing certificate between audits provided it is within the scope of the certificate. The number of sites that may be added between audits is limited to 100% of the existing sites at the previous audit. The following requirements shall be met:	In exceptional cases and as approved by certification body, 100% can be exceeded. E.g., if a group only has 4 sites, it should be possible to add 5.	Additional sites may be added by the certification body to an existing certificate between audits provided it is within the scope of the certificate. The number of sites that may be added between audits is limited to 100% of the existing sites at the previous audit. In exceptional case, but only with prior approval by certification body, the limit may be exceeded. The following requirements shall be met:	Edit considered but not accepted as the term 'exceptional case' is subjective and open to interpretation.
11	4	Correct standard references.		Noted. ISO standards reviewed to ensure correct nomenclature.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
12	5.1	This first sentence doesn't make sense. The initial certification audit is for the purpose of the organization becoming certified, so why would the auditee be a certificate organization No suggested words because not sure what is the requirement.		SFI does not have a term for candidate members. In addition to being in the process of getting initial certification in place, the Certified Organization must pay SFI the applicable membership fee.
1	5.1	"the auditee must be an Certified Organization"	Section 10 SFI Audit Porcedures and Auditor Qualificaitons and Accreditation- grammatical correction: "the auditee must be a Certified Organization..."	Fixed
13	5.2	Correct standard references		Noted. ISO standards reviewed to ensure correct nomenclature.
14	5.2	Paragraph 3 allows for alternative sampling approaches. Who approves these alternatives? What will be evidence that it is approved if not conforming to IAF MD 1.		CB develops the alternative sampling approach. AB assesses its suitability during the annual accreditation assessment.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
15	5.2	There is no need to have Appendix 1 to Section 10, if IAF MD 1 is referenced. This is going to create a disconnect if MD 1 changes, plus Appendix 1 does not contain all of MD 1, so still have to use MD 1.		Comment considered but not accepted. SFI has replicated those elements of MD-01 that it requires to be considered when developing audit samples. If MD-01 changes in the future, SFI will revisit this requirement to ensure alignment.
16	5.4.3	There needs to be further deliniation of how to determine audit time. Only referenincing IAF MD 5 is not enough because IAF MD 5 covers QMS, EMS and OHSMS.		Comment addressed with the additional requirement of IAF MD 11 - requirements for the application of the planning and delivery of audits of integrated management systems.
17	5.4.3	The next audit could be recertification audit so don't limit to surveillance audit.	Verification that the corrective action has been effectively implmeneted shall occur during the next audit.	Edit accepted.
18	5.5	Correct standard references		Noted. ISO standards reviewed to ensure correct nomenclature.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
19	5.7	correct standard references		Noted. ISO standards reviewed to ensure correct nomenclature.
20	5.7	The last sentence say refer to ISO/IEC 17021-1 for more info. However, where in this standard is the additional information? IAF MD 2 is about transferring certifications.. Not sure what to look for in 17021-1.		Comment addressed with edits to 5.7.
21	6.1	Title terminology: Qualification is not the correct term. It is competence. The accreditation/certification documents have used competence for at least 10 years now.		Edit accepted.
22	6.1	This is not a change in new version but there should be a statement that all the competence could be achieved within on auditor.		Comment addressed with edits to 6.1.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
2	6.1	"at least one member shall be a professional forester as defined by the Society of American Foresters (SAF), the Canadian Institute of Forestry, or licensed..."	<p>Section 10 SFI Audit Procedures and Auditor Qualifications and Accreditation- The Canadian Institute of Forestry does not define "professional forester." "Professional forester" is defined by each province, and many provinces laws include the act of auditing to be included as "professional forestry." I am requesting this change as there is inconsistency between the Canadian CBs in how they interpret this requirement, or argue the term "professional forester" as it is not defined by CIF.</p> <p>Proposed new language: "at least one member shall be a professional forester as defined by the Society of American Foresters, or licensed or registered by the state(s) or province(s) in which the certification is conducted, where applicable.</p> <p>*I included "where applicable" as not every province has a professional forestry association.</p>	Edit address with revised part 6.1.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
23	6.2	Title terminology: Qualification is not the correct term. It is competence. The accreditation/certification documents have used competence for at least 10 years now.		Edit accepted.
24	6.2	Correct standard references		Noted. ISO standards reviewed to ensure correct nomenclature.
25	7.1	Correct ANAB references		Edit made.
5	General	The way Section 10 for accreditation requirements is currently set up, it is very hard to differentiate between what is applicable to FM and what is applicable only to COC CB operations. We were hoping that, with the revision process, SFI would split this section into two – one for FM and one for COC.		Comment considered but not accepted. All Auditor requirements continued to be addressed in SFI Section 10.
6	Appendix 1	Audits of Multi-Site Organizations Clause 3	3.1.5. Remote Auditing for Chain of Custody SFI Chain of Custody audits may be done remotely when Organizations meet all of the Multi-Site Organizations eligibility requirements specified in Section 10: Appendix 1, clause 3.1.1 – 3.1.4 and the Organization has successfully hosted onsite audits for five consecutive years without a non-conformity.	Edit considered but not accepted as it does not improve the requirement. Five consecutive years without a non-conformity is a very high threshold and would effectively remove to option for remote audits using ICT.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
26	Appendix 1	Concern that there is partial information from MD 1, then there is reference to MD 1. There should not be duplication. If MD 1 is going to be referenced, then include only the additional requirements for SFI.		Comment considered but not accepted. SFI has replicated those elements of MD-01 that it requires to be considered when developing audit samples. If MD-01 changes in the future, SFI will revisit this requirement to ensure alignment.
27	Appendix 2, 4.1.1	The internal audit is referenced as if it is a known requirements, however internal audit is not referenced in any other part of the standards as requirement for Forest Management or Fiber Sourcing or Chain of custody		Continual improvement requirements under the Forest Management and Fiber Sourcing Standards can be demonstrated with a continual monitoring process or an internal audit process. Appendix 2 is specific to Group Certification Organizations.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
28	Appendix 3	This is an informative document. How is this expected to be used? There is clear expectation of nomenclature on the certificate. It needs to be normative if this is the expectation/requirement. Need to include internal audit term in the other sections of the standard.		This appendix is intended as guidance to CBs. The objective is to have CBs issue certificates which have a similar format across CBs allowing for improved understanding of the contents of an SFI certificate.
29	Appendix 3, 3.	It is an "symbol" not a logo for the AB. And it is accreditation body not accreditation firm.	The symbol of the accreditation body (ANAB or SCC) for the SFI certification body.....	Edit accepted.





Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
1		Does SFI intend to report out on climate change actions taken by program participants or is that open for discussion during this standards revision? If this is open for discussion where should commenters direct feedback as that would be in the program participants annual survey and it is my understanding that this survey is not being opened		Requirements for Certified Organization reporting to SFI on progress toward climate change adaptation and mitigation strategies are addressed in Forest Management Standard Objective 9. SFI will not be disclosing the results of individual certified organization's reporting.
2		There is duplication in this section versus Section 10, 5.5. Why wouldn't all reporting be in Section 11. Then separate out public versus technical report. Much easier for CB and participant.		SFI Section 10, part 5.5 is for the content of the audit report prepared by the CB for the client. This report for Section 10, part 5.5 is not a public document. Section 11 is for public reporting.
3		Title of section (Forest management section) could have a number for referencing purposes.		Comment addressed with edits to Section 11.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
4		1. a) this references MD 1 conformity, again, not sure about Appendix 1 of Section 10 because it is not referenced here		MD 01 is a normative reference for SFI Section 10, Appendix 1. Therefore, reference to MD-01 in Section 11 ensures alignment with SFI Section 10, Appendix 1.
5		Title of section (Fiber Sourcing) sould have a number for referencing purposes.		Comment addressed with edits to Section 11.
6		There is a number missing under the Fiber sourcing... it just starts with a.		Fixed
7		a) this references MD 1 conformity, again, not sure about Appendix 1 of Section 10 because it is not referenced here		MD 01 is a normative reference for SFI Section 10, Appendix 1. Therefore, reference to MD-01 in Section 11 ensures alignment with SFI Section 10, Appendix 1.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
8		For the sake of basic transparency, public summaries should include the evidence of conformity/nonconformity per each performance measure.		During surveillance audits not every Performance Measure is in the scope of the audit. For those Performance Measures that are in scope the public audit summary does detail the evidence used to determine the degree of conformance.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
1	2.1.1	Why does this need to be a letter? Most CBs have an online complaint receipt process. There should be options on how to submit a complaint.		Comment addressed with edits to 2.1.1.
2	2.1.5	This has to be removed. The AB is not part of the complaint process.. ABs do not get involved with appeals from a CB customer.	REMOVE this clause not correct.	Comment addressed with edit to 2.1.5.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
1	Modules	The inclusion of Certified Logging Companies into an SFI module would be a great way to expand certification of SFI small lands . CLC provide in the forest verification of each harvest. This could be similar to what was done with Certified Logger Programs in the mid 2000's. You can find out more about this approach by researching the white paper titled Wood Procurement from Private Lnads in North America.	Create a Certified Logger Company module to help SFI Certified Organizations use all the tools in their toolbox. <b>Or INCLUDE CLC IN THE SCOPE OF THE STANDARD</b>	Comment addressed with new definition for 'Certified Logging Company' and Forest Management Standard Objective 12 and Fiber Sourcing Standard Objectives 3 and 6.
2	Species at Risk Module	Is the definition of key habitat acceptable to provincial and federal regulatory agencies? Recovery plans usually provide for better inventory data to be used to map critical habitat locally.	Ensure the term and definition of 'key habitat' are acceptable to the regulatory agencies.	Noted. Species at Risk Module is still under development.
3	Species at Risk Module	References throughout the section are made to Threatened, endangered, and species at risk. In Canada Threatened and Endangered species are species at risk, so adding species at risk to the list seems odd. Further the module only applies to species classified as Threatened or Endangered.	Replace species at risk with special concern, since no habitat protection is provided to species classified as special concern in Canada the rest of the module remains the same OR Rephrase 'threatened, endangered, and species at risk' to 'species at risk' or 'threatened or endangered species at risk'	Noted. Species at Risk Module is still under development.



Comment #	Draft SFI 2022 Clause	Comment	Proposed new language	Comment Disposition
4	SFI Fiber Sourcing	Suggest creating a module for formal recognition of independently certified Master Logger Programs and participating CLCs. Doing so would deliver significant benefits to SFI in terms of elevated implementation of SFI standards, including legal compliance and on-the-ground performance, to CO's by creating material efficiencies in the implementation of their FS programs as well as improved in-woods performance, to loggers be formally recognizing their critical role in sustainable forestry and incentivizing elevated professionalism, and to brands by strengthening the integrity of claims and alignment with expectations associated with forestry practices on non-certified lands that supply fiber for their products. See related comments in the Fiber Sourcing tab.		Comment addressed with new definition for 'Certified Logging Company' and Forest Management Standard Objective 12 and Fiber Sourcing Standard Objectives 3 and 6.



Comment #	Draft SFI 2022 Term	Comment	Proposed new language	Comment Disposition
60	Soil health:	Please provide a practical means of measuring this.		New definition of 'soil health' - See SFI Section 14 - Definitions.
68	Threatened and endangered	La définition actuelle est trop inclusive en ce sens qu'elle oblige l'organisation certifiée à considérer des espèces en péril pour lesquelles les activités d'aménagement forestier ne constituent pas une réelle menace.	Reformuler la définition : Inscrit sur la liste prévue à la loi sur les espèces en voie d'extinction ("Endangered Species act") des États-Unis ou à la Loi sur les espèces en péril du Canada ou à une loi pertinente de l'État ou de la province comme devant faire l'objet d'une protection et pour lesquelles les activités d'aménagement forestier sont identifiées comme une menace dont le niveau de préoccupation est élevé.	Definition considered but not accepted as it does not improve the existing definition.
69	Threatened and Endangered		threatened and endangered: Listed under The U.S. Endangered Species Act or The Canadian Species at Risk Act or listed under applicable state or provincial laws requiring protection.	Definition considered but not accepted as it does not improve the existing definition.
75	Wildlife	Silviopastoral systems? Feral hogs?	"Aquatic (marine and freshwater) and terrestrial fauna not being raised in captivity, nor escaped therefrom."	Definition considered but not accepted as it does not improve the existing definition.



Comment #	Draft SFI 2022 Term	Comment	Proposed new language	Comment Disposition
10	Certified Logging Company	It remains unclear the difference between QLP and CLC. The major enhancements document claims that the definition of CLC was updated to make the emphasis on the company. However, the definition still describes a CLC in a way that describes an individual QLP.	A wood producing organization that has successfully completed and is a participant member in good standing of a credible logger certification program.....	Comment addressed with the new definition of 'certified logging company'. See Section 14 - Definitions.
11	Certified Logging Company	Definition is itself confusing and mixes terms ... also it should be the role of SFI Inc. to determine whether to recognize Master Loggers and if so, what continued monitoring will be conducted to ensure that the Master Loggers programs that apply to SFI for recognition continue to be well-managed and in conformance with the required elements. By assigning this to SICs, SFI Inc is setting-up scenarios for reputational and relationship risks and damaging impacts and over-burdening already stressed SICs.		Comment addressed with the new definition of 'certified logging company'. See Section 14 - Definitions.





Comment #	Draft SFI 2022 Term	Comment	Proposed new language	Comment Disposition
12	Certified Logging Company	<p>A Wood Producer that is recognized as a qualified logging professional who has successfully completed and is a participant in good standing of a credible logger certification program recognized by the SFI SIC as meeting the criteria of PM 12.3 in the SFI FM Standard or PM 6.3 in the SFI FS Standard.</p> <p>1. Why is QLP still in this definition? It is already part of the criteria for acceptance by SIC that CLC's require key personnel have QLP logger training and it is up to date. This meets the on-site requirements. The Certified Logging Company has trained staff on crew.</p>	A Wood Producer that has successfully completed and is a participant in good standing of a credible logger certification program recognized by the SFI SIC as meeting the criteria of PM 12.3 in the SFI FM Standard or PM 6.3 in the SFI FS Standard, which includes requirements for meeting the on-site requirements for QLP's.	Comment addressed with the new definition of 'certified logging company'. See Section 14 - Definitions.
13	Certified Logging Company	<p>This definition does not look much different than the definition of CLP from the 2015 standard.</p> <p>"A Wood Producer that is recognized as a qualified logging professional who has successfully completed and is a participant in good standing of a credible logger certification program recognized by the SFI SIC as meeting the criteria of PM 12.3 in the SFI FM Standard or PM 6.3 in the SFI FS Standard. "</p>	It's important to make the distinction that a CLC has independent in-forest-verification. The criteria for CLC is a great change. The definition of CLC however needs work, see above.	Comment addressed with the new definition of 'certified logging company'. See Section 14 - Definitions.



Comment #	Draft SFI 2022 Term	Comment	Proposed new language	Comment Disposition
14	Certified Logging Company	Insert item (3) under "a." from the Qualified Logging Professional definition into the Certified Logging Company definition to clarify what we believe is the intent of the training and continuing education requirement for Certified Logging Companies, which also appears in, Expectations for On-site Supervision by Qualified Logging Professional or Certified Logging Company found in Section 7 (Guidance to SFI Standard and Rules).	Certified Logging Company: A Wood Producer that is recognized as a qualified logging professional who has successfully completed and is a participant member in good standing of a credible logger certification program recognized by the SFI Implementation Committee as meeting the criteria of PM 12.3 in the SFI Forest Management Standard or PM 6.3. in the SFI Fiber Sourcing Standard. The principal of the logging company or his representative will identify who has direct responsibility and is on-site regularly to consistently carry out the roles and responsibilities of the qualified logging professional under the SFI 2022 Standard(s) (e.g., safety, protection of soils, streams and other water bodies).	Comment addressed with the new definition of 'certified logging company'. See Section 14 - Definitions.



Comment #	Draft SFI 2022 Term	Comment	Proposed new language	Comment Disposition
15	Certified Logging Company	As a Master Logger or Certified Logging Company, I am the principal owner of my logging business. With that brings great responsibility to keep my employees safe and adhere to BMP's among other things. I have employees on each crew that can handle unexpected situations. I myself do not want to be recognized a QLP. I want to be recognized as the principal of my company and Certified Logging Company.	A Wood Producer that has successfully completed and is a participant in good standing of a credible logger certification program recognized by the SFI SIC as meeting the criteria of PM 12.3 in the SFI FM Standard or PM 6.3 in the SFI FS Standard, which includes requirements for meeting the on-site requirements for QLP's.	Comment addressed with the new definition of 'certified logging company'. See Section 14 - Definitions.
16	Certified Logging Company	Certified Logging Companies already have QLP's on-site because it is in our standard. Why does it need to be in the new draft definition?		Comment addressed with the new definition of 'certified logging company'. See Section 14 - Definitions.
17	Certified Logging Company (CLC)	A CLC should not be described as a sub-category of a Qualified Logging Professional as a CLC is a company and a QLP is an individual.		Comment addressed with the new definition of 'certified logging company'. See Section 14 - Definitions.



Comment #	Draft SFI 2022 Term	Comment	Proposed new language	Comment Disposition
18	certified logging company:		A <u>Wood Producer</u> (could be an Organization) that is <i>recognized as a qualified logging professional</i> who has successfully completed and is a participant member in good standing of a credible logger certification program recognized by the SFI Implementation Committee as meeting the criteria of PM 12.3 in the SFI Forest Management Standard or PM 6.3. in the SFI Fiber Sourcing Standard.)	Comment addressed with the new definition of 'certified logging company'. See Section 14 - Definitions.
76	Wood Producer	As a Certified Master Logger I implement Safety Programs, follow BMP's, and operate in professional and legal manner. I do this for myself and my employees. It would be nice if SFI recognized this.	A Wood Producer that has successfully completed and is a participant in good standing of a credible logger certification program recognized by the SFI SIC as meeting the criteria of PM 12.3 in the SFI FM Standard or PM 6.3 in the SFI FS Standard, which includes requirements for meeting the on-site requirements for QLP's.	Definition considered but not accepted as it does not improve the existing definition.
77	wood producer	change wood dealer	prefer wood suppliers	Definition considered but not accepted as it does not improve the existing definition.



Comment #	Draft SFI 2022 Term	Comment	Proposed new language	Comment Disposition
78	Wood Producer	Certified Logging Company is a step in the right direction for SFI. I am a Certified Master Logger Company and I provide training for my crews through a variety of resources including the Maine SFI Training. It seems very inefficient to double audit what I am already doing.	A Wood Producer that has successfully completed and is a participant in good standing of a credible logger certification program recognized by the SFI SIC as meeting the criteria of PM 12.3 in the SFI FM Standard or PM 6.3 in the SFI FS Standard, which includes requirements for meeting the on-site requirements for QLP's.	Definition considered but not accepted as it does not improve the existing definition.
79	Wood Producer	My company is a Certified Master Logger. Why isn't the in-forest-verification by a third party more important to SFI? It seems this verification could be mutually beneficial to both SFI and Certified Master Loggers	A Wood Producer that has successfully completed and is a participant in good standing of a credible logger certification program recognized by the SFI SIC as meeting the criteria of PM 12.3 in the SFI FM Standard or PM 6.3 in the SFI FS Standard, which includes requirements for meeting the on-site requirements for QLP's.	Definition considered but not accepted as it does not improve the existing definition.



Comment #	Draft SFI 2022 Term	Comment	Proposed new language	Comment Disposition
80	Wood Producer	Certified Logging Company- My company falls into the Certified Logging Company category. However, a QLP is defined as a person or individual. My company is an entire group of individuals, with many of them being QLP trained. Wouldn't it be less confusing if QLP was not included in the CLC definition?	A Wood Producer that has successfully completed and is a participant in good standing of a credible logger certification program recognized by the SFI SIC as meeting the criteria of PM 12.3 in the SFI FM Standard or PM 6.3 in the SFI FS Standard, which includes requirements for meeting the on-site requirements for QLP's.	Definition considered but not accepted as if does not improve the existing definition.
81	wood producer:		<u>A person or organization</u> , including loggers and wood dealers, involved in harvesting or regularly supplying wood fiber directly from the forest for commercial purposes	Definition considered but not accepted as if does not improve the existing definition.
50	Qualified Logging Professional	Part a. is not defining a 'qualified logging professional'. Note, too, that the first four lines are the same as PM 12.3, but then the language changes.	Delete part a. of this definition.	Edit considered but not accepted as if does not improve the existing definition.



Comment #	Draft SFI 2022 Term	Comment	Proposed new language	Comment Disposition
51	Qualified Logging Professional	Overall, the definition of a QLP is not clear. Under the definition part A defines very specific requirements for QLPs with outlined responsibilities with an assumption of a supervisory role. Part B of the definition then says a QLP must simply have required training for their level of responsibility. As is currently written it is quite unclear what the expectation is, as a QLP seems to be defined as any person with some sort of training. Further, in part A of the definition, it states that each crew must include a qualified logging professional. Crew must be defined if it is to be interpreted correctly in this place.	Clearly articulate the differences between parts A and B of the definition, as well as which of those relevant personnel are considered the necessary QLP "regularly onsite". Alternatively, remove part B of the definition completely.	Comment addressed with the revised definition of 'qualified logging professional'. See Section 14 - Definitions.
52	Qualified logging professional	Qualified is no longer used... it would be "competent logging professional"		Comment addressed with the revised definition of 'qualified logging professional'. See Section 14 - Definitions.
53	Qualified Logging Professional	paragraph "a." in this definition is actually a performance measure and should appear in Section 2 (Forest Management Standard), Objective 12 - Training and Education, Performance Measure 12.1 and Section 3 (Fiber Sourcing Standard), Objective 6 - Training and Education, Performance Measure 6.1	remove paragraph "a." from the "Qualified Logging Professional" definition.	Edit considered but not accepted as it does not improve the existing definition.
54	Qualified Logging Professional	This definition has an incorrect reference to Objective 11 (Forest Management Standard).	Correct the reference (change "Section 11" to "Section 12")	Noted.



Comment #	Draft SFI 2022 Term	Comment	Proposed new language	Comment Disposition
55	qualified logging professional	Def to be slightly modified	To be considered a qualified logging professional , an individual must complete the required training appropriate to <b>his/her</b> level of responsibility (e.g., owner, supervisor, employee) within the specified time period required by their SFI Implementation Committee . SFI Implementation Committees have the flexibility to require different training requirements for owners of logging businesses versus training requirements for other employees (e.g., supervisors). Once classified as a qualified logging professional , the individual must complete the required SFI Implementation Committee maintenance training within the prescribed time period to retain <b>his/her</b> status as a qualified logging professional.	Edit considered but not accepted as if does not improve the existing definition.
56	qualified logging professional:		A <u>person</u> with specialized skills in timber harvesting who has successfully completed wood	Edit considered but not accepted as if does not





Comment #	Draft SFI 2022 Term	Comment	Proposed new language	Comment Disposition
			<p>producer training programs and continued education requirements recognized by SFI Implementation Committees as meeting the spirit and intent of performance measure under Objective 11 in the SFI 2022 Forest Management Standard or Objective 6 in the SFI 202215-2019 Fiber Sourcing Standard.</p> <p>a. Each crew must include a qualified logging professional who (1) has completed the SFI Implementation Committee approved wood producer training program; (2) is an owner of, employee of, or contracted by the wood producer ; (3) has direct responsibility and is on-site regularly to consistently carry out the roles and responsibilities of the qualified logging professional under the SFI 202215-2019 Standard(s) (e.g., safety, protection of soils, streams and other water bodies).</p>	improve the existing definition.



Comment #	Draft SFI 2022 Term	Comment	Proposed new language	Comment Disposition
2	Appropriate Consultation	Needs definition even if to direct the reader to Section 7		Task Group decided not to define the term but have created Guidance regarding appropriate consultation with Indigenous Peoples. See SFI Section 7 Guidance: Communications with Indigenous Communities
3	audit team	The reference to 19011 is not current, the document is not 2018		Noted.
4	auditor	The reference to 19011 is not current, the document is not 2018		Noted.
5	Best management practices	The beginning of the definition relates solely to water quality, while the end of the definition deals with '...addressing any environmental considerations'.	Revise definition for clarity	Edit considered but not accepted as if does not improve the existing definition.



Comment #	Draft SFI 2022 Term	Comment	Proposed new language	Comment Disposition
6	Biological diversity, biodiversity	Need to include "identity" in this definition or change your term diversity into integrity to reflect that the most important indicator of healthy forests is the occurrence of the naturally occurring species	biological diversity, biodiversity: The variety, identity and abundance of life forms, processes, functions, and structures of plants, animals and other living organisms, including the relative complexity of species, communities, gene pools and ecosystems at spatial scales that range from local to regional to global.	Edit considered but not accepted as it does not improve the existing definition.
7	certification body	correct reference to ANAB		Noted.
8	Certified Area	Should this definition include a reference to ATFS certification?		No - ATFS is its own standard.
9	certified content	This definition represents an important and substantial flaw in this standard. As defined, it is identical to Certified Forest Content. This renders most common applications of claims invalid - clearly not the intent.	Define Certified Content to include all categories that are used as the basis for claims - including Cert. Forest Content, Certified Sourcing, Recycled.	Existing definition of certified content does that.



Comment #	Draft SFI 2022 Term	Comment	Proposed new language	Comment Disposition
19	certified sourcing	This long-standing definition contains an unfortunate flaw that should (finally) be fixed. As stated, CS includes a) Section 3 certified material, b) Recycled (pre- & post-), c) CFC, and d) non-controversial sources. This is contrary to the 2/3 threshold found in Section 5. It also implies that Certified Sourcing material is the same as both Recycled and CFC - clearly not the case. Overall, this definition is confusing (at best) and misleading (at worst).	Limit the definition to material produced by Section 3 certificates.	Comment addressed with the revised definition of 'certified sourcing'. See Section 14 - Definitions.
20	controversial sources	b) and c) are overreaching. As an example, while the US South is on a trend where growth exceeds drain, it is conceivable that any given year or period, this may reverse. While growth to drain could still be positive, it would be a fair statement to say the region is in a period of decline, thus any conversion would not be allowed.	either delete b) and c) from the definition of controversial sources, or add qualifier to state documented long term decline or similar language	Comment addressed with the revised definition of 'controversial sources'. See Section 14 - Definitions. Also, refer to SFI Section 7 Guidance: Diligence System for Assessment Risk of Sourcing from Controversial Sources



Comment #	Draft SFI 2022 Term	Comment	Proposed new language	Comment Disposition
21	controversial sources	In section b. of the definition of "controversial sources", what constitutes a "region" when evaluation "regional declines"? Our company procures timber from 4 states, but none comes from farther than 100 miles away. Is the region the entire northeast, those 4 states, or the procurement radius within which we source fiber?	A definition that explained and defined "regional" would be helpful.	Comment addressed with the revised definition of 'controversial sources'. See Section 14 - Definitions. Also, refer to SFI Section 7 Guidance: Diligence System for Assessment Risk of Sourcing from Controversial Sources
22	controversial sources	The definition of "regional" pertains to section c. "conversion sources". If the definition of "region" is looked at more broadly (which would encompass territory outside the company's procurement zone), any purchase of timber from land converted to non-forest use could be prohibited. If the region is considered more narrowly, there may not be an issue.	A definition that explained and defined "regional" would be helpful.	Comment addressed with the revised definition of 'controversial sources'. See Section 14 - Definitions. Also, refer to SFI Section 7 Guidance: Diligence System for Assessment Risk of Sourcing from Controversial Sources



Comment #	Draft SFI 2022 Term	Comment	Proposed new language	Comment Disposition
23	controversial sources	Under "conversion sources", what constitutes "forestland"? If wood is harvested from a small house site in an area that is already developed, would that be considered "forestland" and a prohibited "conversion source"?	Some further explanation and clarification regarding land conversion would be helpful. Are all trees considered "forest"?	Comment addressed with the revised definition of 'controversial sources'. See Section 14 - Definitions. Also, refer to SFI Section 7 Guidance: Diligence System for Assessment Risk of Sourcing from Controversial Sources
24	Controversial sources definition	Some text should be italicised when there is a definition. Problem with the definitions of other terms in the definition itself.	Italic required for h. and i.  Definition of illegal logging and following terms should at least be copied in the definition alphabetical order if they stay in the controversial sources definition, took me a while to find them!	Comment addressed with the revised definition of 'controversial sources'. See Section 14 - Definitions.



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25	Controversial sources Indicator b)	According to this definition, would forest activities that may contribute to reducing the long-term caribou population in Canada (e.g., clearcutting mature boreal forests outside of protected/conserved areas) be considered as a controversial source of fibre?	Clarify definition of controversial sources	Comment addressed with the revised definition of 'controversial sources'. See Section 14 - Definitions. Also, refer to SFI Section 7 Guidance: Diligence System for Assessment Risk of Sourcing from Controversial Sources
26	Controversial Sources, subparagraph g, Illegal Logging including trade in CITES (The Convention on International Trade in Endangered Species of Wild Fauna and Flora) listed species.	As worded, this statement appears to imply that trade in CITES-listed species is illegal. The majority (approximately 90%) of CITES-listed species, including tree species, are listed on CITES Appendix II, for which international trade in wildlife specimens and derivatives is legal, provided the specimens are accompanied by a CITES export permit indicating a finding of non-detrimental trade and legal acquisition have been made by the designated Scientific and Management Authorities of the country of export.	"Illegal Logging " means harvesting and trading of wood fiber in violation of applicable laws and regulations in the country of harvest including trade in species listed on Appendix II and III of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) where requisite export permits or similar documents required for legal trade are not provided.	Comment addressed with the revised definition of 'controversial sources'. See Section 14 - Definitions. Also, refer to SFI Section 7 Guidance: Diligence System for Assessment Risk of Sourcing from Controversial Sources



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27	Controversial Sources: Bullet B	The term conservation implies dollars spent towards a specific conservation activity.	Change conservation to protection.	Comment addressed with the revised definition of 'controversial sources'. See Section 14 - Definitions.
28	Controversial Sources: Bullet C Conversion	Further guidance is needed to better define the term region. Also would suggest additional parameters related to conversion such as mitigation and the term legal and limited.		Comment addressed with the revised definition of 'controversial sources'. See Section 14 - Definitions. Also, refer to SFI Section 7 Guidance: Diligence System for Assessment Risk of Sourcing from Controversial Sources
29	Controversial Sources: General comment	Additional guidance should be given on how to access and determine if a source is controversial.		Comment addressed with the revised definition of 'controversial sources'. See Section 14 - Definitions. Also, refer to SFI Section 7 Guidance: Diligence System for Assessment Risk of Sourcing from Controversial Sources





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30	Conversion Sources	The definition of conversion sources should have categorical exclusion criteria, such as, if: i) The conversion "is in compliance with national and regional policy and legislation applicable for land use and forest management" (quoted from the new PEFC CoC Standard section 3.7.e.i). ii) The conversion itself, or accepting material from the conversion, has beneficial environmental, economical, or social effects. iii) The conversion is of low risk for having detrimental impacts on FECV's.		Comment addressed with the revised definitions of 'controversial sources' and 'conversion sources' See Section 14 - Definitions. Also, refer to SFI Section 7 Guidance: Diligence System for Assessment Risk of Sourcing from Controversial Sources
31	Conversion Sources	State explicitly that if low risk is determined, then any "knowingly" sourcing of conversion sources is not considered a controversial source.		Comment addressed with the revised definitions of 'controversial sources' and 'conversion sources' See Section 14 - Definitions. Also, refer to SFI Section 7 Guidance: Diligence System for Assessment Risk of Sourcing from Controversial Sources
37	FECV	Is not a definition.	"Forest areas that contain ecological communities and species designated as either Critically imperiled (G1) or imperiled (G2)."	Edit considered but not accepted as it does not improve the existing definition.



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38	FECV	Critically imperiled and imperiled are each defined elsewhere with the exact same words.	Delete them here.	Edit considered but not accepted as if does not improve the existing definition.
43	long term	Objective 1: The definition of 'long-term' is a bit nebulous – it is defined by a rotation length or longer. In Michigan a rotation can be 50-150 years. I think that this needs a better definition and one that is influenced by climate change. Given climate change, 30-50 years may be more realistic.		Edit considered but not accepted as if does not improve the existing definition.
44	Major nonconformity	There is a definition in ISO/IEC 17021-1 for major nonconformity that has other criteria. That definition needs to be used then SFI can add to it. Definition in 17021-1: nonconformity that affects the capability of the management to achieve the intended results.		Edit considered but not accepted as if does not improve the existing definition.
45	Pest - new definition	Suggest adding "Pest" to the definition section	I suggest that the definition of pests" be added. Here is one definition. The term "pest" is generally defined as any biotic agent (for example insect and disease) designated as detrimental to effective resource management.	Task Group decided not to define this term placing reliance instead on the new definition of 'integrated pest management'.



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46	Post-consumer recycled content.	<p>Suggest adopting EPA definitions of pre and post-consumer recycled fiber.  <a href="https://www.epa.gov/smm/definitions-specifications-and-other-guidance-about-comprehensive-procurement-guideline-program">https://www.epa.gov/smm/definitions-specifications-and-other-guidance-about-comprehensive-procurement-guideline-program</a>.                      Our company has changed our guidance to customers and our own processes to match the EPA definitions (which current SFI aligns with) and we encourage SFI to stay as close to EPA definitions as possible. Although we recognize the influence and desire to completely align with PEFC, SFI is a domestic certification standard to NA and should align with common interpretations and uses of these terms.</p>	<p>EPA definition:                      Postconsumer fiber means:</p> <ul style="list-style-type: none"> <li>• Paper, paperboard, and fibrous materials from retail stores, office buildings, homes, and so forth, after they have passed through their end-usage as a consumer item, including: used corrugated boxes; old newspapers; old magazines; mixed waste paper; tabulating cards; and used cordage; and</li> <li>• All paper, paperboard, and fibrous materials that enter and are collected from municipal solid waste.</li> <li>• Postconsumer fiber does not include fiber derived from printers' over-runs, converters' scrap, and over-issue publications.</li> </ul> <p>Recovered fiber means:                      Postconsumer fiber such as:</p> <ul style="list-style-type: none"> <li>• Paper, paperboard, and fibrous materials from retail stores, office buildings, homes, and so forth, after they have passed through their end-usage as a consumer item, including: used corrugated</li> </ul>	Edit addressed with the revised definition of 'post-consumer recycled content'.



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			<p>boxes; old newspapers; old magazines; mixed waste paper; tabulating cards; and used cordage; and</p> <ul style="list-style-type: none"> <li>• All paper, paperboard, and fibrous materials that enter and are collected from municipal solid waste, and Fiber from manufacturing and converting operations, such as: <ul style="list-style-type: none"> <li>• Dry paper and paperboard scrap generated after completion of the papermaking process (that is, those mill operations that occur after production of the paper machine reel), which includes scrap generated through slitting, cutting, trimming and other converting operations by the paper manufacturer;</li> <li>• Envelop cuttings, bindery trimmings, and other paper and paperboard recovered materials resulting from printing, cutting, forming, and other converting operations;</li> <li>• Recovered bag, box, butt rolls, and carton manufacturing materials, mill wrappers, and rejected unused stock; and</li> <li>• Repulped finished paper and</li> </ul> </li> </ul>	



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			<p>paperboard from obsolete inventories of paper and paperboard manufacturers, merchants, wholesalers, dealers, printers, converters, or others.</p> <p>Mill broke means any paper scrap generated in a paper mill prior to completion of the papermaking process. It is usually returned directly to the pulping process. Mill broke is excluded from the definition of "recovered fiber."</p>	



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47	pre-consumer recycled content	<p>Suggest adopting EPA definitions of pre and post-consumer recycled fiber. The second sentence could be in conflict with the EPA pre-consumer definition at <a href="https://www.epa.gov/smm/definitions-specifications-and-other-guidance-about-comprehensive-procurement-guideline-program">https://www.epa.gov/smm/definitions-specifications-and-other-guidance-about-comprehensive-procurement-guideline-program</a>. Our company has changed our guidance to customers and our own processes to match the EPA definitions (which current SFI aligns with) and we encourage SFI to stay as close to EPA definitions as possible.</p> <p>Definitions shown on this page include some examples to help clarify manufacturing and converting operations. Click here for the formal definitions found in RCRA Section 6002.</p>	See EPA definitions	Edit addressed with the revised definition of 'post-consumer recycled content'.
48	primary producers	It will be helpful to have a definition of composite products here.		Edit considered but not accepted as it does not improve the existing definition.



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49	Protection (or protect)	Unclear.	"Maintenance over the long term of the status or integrity of identified attributes or values, (examples include water quality, biodiversity, wildlife habitat, species at risk, and Forests with Exceptional Conservation Value). Consideration must be given to stand dynamics, historical disturbance patterns, fire risk, and forest health when determining appropriate strategies for protecting forest attributes and associated habitats and species. Protection does not preclude resource management and may in fact require or benefit from it."	Edit addressed with the revised definition of 'protection (or protect)'.
57	SFI 2022 Audit Procedures and Auditor Qualification and Accreditation	Don't use Qualification		Noted, however definition remains unchanged.
58	SFI Certification	Verification is not the word to use. The CBs are not verifying. They are determining conformity to support certification.		Definition remains unchanged.



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59	Site:	The definition of site could be given a scale parameter so that there is reduced confusion related to a point. This stems from Performance measure 2.3.2 and 2.3.3 where one could consider to "site productivity" as a point feature.	A site is a permanent location where an organization carries out work or a service. Location in this context would refer to a harvest area rather than a specific point within a harvest area.	Edit considered but not accepted as it does not improve the existing definition.
61	Stakeholder	A stakeholder is someone "with an interest in the subject of the standard." The SFI 2022 Forest Management Standard? Also, not everyone with an opinion is a stakeholder.	"A person, group, community or organization who could be directly and materially affected by management decisions made by the Certified Organization."	Edit considered but not accepted as it does not improve the existing definition.
62	Stakeholder	Stakeholder needs to be tied to the CH by more than just interested in the standard.	Stakeholder: A person, group, community, or organizations with an interest in the subject of the standard and affected by the management of the organization.	Edit considered but not accepted as it does not improve the existing definition.
63	stakeholder	The definition of stakeholder is far too broad. A person interested in the subject of the standard could be someone in England with no direct stake or interest in PA state forest land. We do not feel consultation should be necessary with such people, based merely on their interest in the standard. They should have a direct connection or vested interest with state forest land.	stakeholder: A person, group, community or organisation with an interest in or a connection to the certified area.	Edit considered but not accepted as it does not improve the existing definition.





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64	stakeholder	having "an interest" is too broad	at the very least, revise to state "a material interest" or a vested interest"	Edit considered but not accepted as if does not improve the existing definition.
66	third- party certification	it is "conformity" not "conformance"		Definition remains unchanged.
67	third- party certification	the 2015-2019 version of the standard is still referenced. This needs updated.		Noted.
71	Verifiable monitoring system	"Third party" is not a defined term, even though it is italicized.	Remove italics.	Noted.
73	Visual quality	Amorphous. Focus on definition of VQ management instead?	Delete.	Edit considered but not accepted as if does not improve the requirement in Objective 5 SFI Section 2 - Forest Management Standard.
74	Visual quality management	To whom? Elsewhere, the term 'visual impacts' is used.	"A program that considers stakeholder perceptions of the visual impacts of forestry operations and limits negative visual impacts."	Edit considered but not accepted as if does not improve the existing definition.



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40	Indigenous Peoples	<p>En ce qui concerne les Métis, il importe de se référer aux critères établis par l'arrêt Powley de la Cour suprême du Canada (2003). De manière générale, la détermination du statut d'Indien, de Métis et d'Inuit doit donc être conforme à l'état du droit au Canada. En outre, il est utile de faire appel aux instances gouvernementales concernées pour leur identification.</p> <p>Il est à noter qu'aucune communauté aspirant au statut de communauté métisse n'a été reconnue au Québec à ce jour, tout comme aucun tribunal n'a encore reconnu une telle communauté au Québec au regard des critères établis par l'arrêt Powley.</p>	S'assurer que la définition "d'Autochtones" est conforme à l'état du droit au Canada.	Definition meet both the US and Canadian federal definition of Indigenous People (Tribes and First Nations and Metis)
41	Indigenous Peoples	<p>FYI referred to earlier for Canada: Aboriginal and Treaty Rights Information System / <a href="https://www.aadnc-aandc.gc.ca/eng/1100100014686/1100100014687">https://www.aadnc-aandc.gc.ca/eng/1100100014686/1100100014687</a></p>		Definition meet both the US and Canadian federal definition of Indigenous People (Tribes and First Nations and Metis)
70	Traditional forest-related knowledge	Revise definition. Use the United Nation's definition which was already developed by Indigenous peoples around the world; i.e., the full definition proposed by UNESCO in the framework of joint work with Internal Council of Science (ICSU)	e.g., Forest-related understandings, skills and philosophies developed by societies with long histories of interaction with their natural surroundings.	Edit considered but not accepted as it does not improve the existing definition.



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1	Afforestation		Consider Using CDM definition rather than FAO. CDM definition: The direct human-induced conversion of land that has not been forested for a period of at least 50 years to forested land through planting, seeding and/or human-induced promotion of natural seed sources	Definition remains unchanged. Definition aligns with PEFC definition of afforestation.
32	Ecological Communities	Needs definition		Task Group decided not to define this term placing reliance instead on the new definition of 'ecologically important'.
33	Ecological Community	Define this term		Task Group decided not to define this term placing reliance instead on the new definition of 'ecologically important'.



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34	Ecologically important	The definition does not indicate that the importance of the ecosystem should be considered. Otherwise a little hard to follow.	"contributes significantly, either by itself or in a network, to an important ecosystem's productivity, biodiversity, and resilience. Important ecosystems may be so identified by the presence of species or natural communities which are relatively uncommon on the landscape, including species with a high "S-Rank" or "G-Rank" from NatureServe, subject to the discretion of the Certified Organization."	Edit considered but not accepted as it does not improve the current definition.
35	Ecologically Important	In the definition it discusses High S-Rank or G-Rank species, but does not include natural communities that are Hight S or G rank. Was this intentional? Furthermore, what is "High", is this S1-2, G1-2 or lower?		Edit considered but not accepted as it does not improve the current definition.
36	Ecologically important	"Ecologically important can be defined..."	Delete "Can be"	Edit considered but not accepted as it does not improve the current definition.



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39	Forest cover type	Most forest cover type maps in our region are based on photo-interpretation, and stands cannot reliably be typed to their SAF cover type. So regional forest cover typing standards have evolved through time which are suitable for forest management planning and operations.	"Classification of a forest stand by the dominant tree species or combination of tree species present. For the purposes of PM 1.2, unless required to use a regulatory system of forest cover type classification, the Certified Organization shall consider forest types based on a system similar to the Society of American Foresters Forest Cover Types of the United States and Canada (Eyre, 1980)."	Edit considered but not accepted as it does not improve the current definition.
42	Locally Rare	Needs definition - Section, Province, State?		Task Group decided not to define this term placing reliance instead on the new definition of 'ecologically important'.
65	Sustainable Forestry	Principle 1 references and then appears to restate the definition of sustainable forestry. However, this does not align with the definition in section 14	Definition needs to change "without compromising" to "while promoting", and also "carbon" to "climate change mitigation"	Edit considered but not accepted as it does not improve the current definition.
72	Vernal pool	Wetland obligate fauna do not define a vernal pool	"A seasonal wetland with sufficient water present during amphibian breeding season, absence of fish, and presence of diagnostic fauna."	Edit considered but not accepted as it does not improve the current definition.



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73	least-toxic and narrowest-spectrum pesticide	The word cost needs to be removed. the standard is not an economic but rather an ecologic evaluation of forest practice. Note: in no other portion of the Standard is 'cost' a specified criteria.	Propose the sentence reads ...degree of control and other environment issues,	Edit addressed with revised definition of least-toxic and narrowest spectrum pesticide.