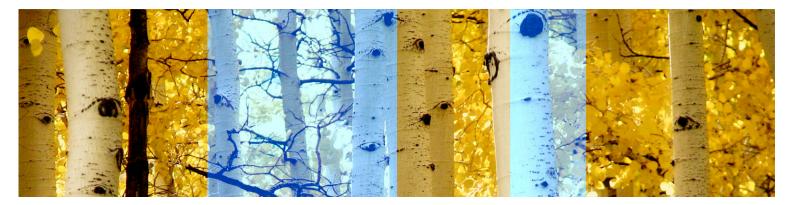


PEFC Council

Assessment of the Revised Sustainable Forestry Initiative (SFI) Program Against PEFC Council Requirements

Final Report

Helsinki, Finland June 20, 2016 7670 ID 84537





DISCLAIMER

Indufor makes its best effort to provide accurate and complete information while executing the assignment. Indufor assumes no liability or responsibility for any outcome of the assignment.

Copyright © 2016 Indufor



TABLE OF CONTENTS

PRI	EFACE	1		1
1.	INTR	ODUCTI	ON	1
	1.1 1.2 1.3	Assess	ve and Scope of the Assessment ment Process Structure	1 1 2
2.	REC	OMMENI	DATION	3
3.	SUM	MARY O	F FINDINGS	5
	3.1 3.2 3.3 3.4 3.5 3.6 3.7 3.8	Genera Standar Forest I Certifica Notifica PEFC L	ment Scope I Scheme Structure rd Setting Procedures and Processes Management Standard ation and Accreditation Procedures tion of Certification Bodies Logo Licensing and Logo Use aints and Dispute Resolution Procedures	5 5 6 8 9 10
4.	MAT	ERIAL AI	ND METHODS	11
	4.1 4.2 4.3		Documentation gram Documentation s	11 12 14
5.	STRI	JCTURE	OF THE SUSTAINABLE FORESTRY INITIATIVE PROGRAM	16
	5.1 5.2 5.3	Standa	e Organization rd Setting and Revision Procedures Management Standard Revision Process	16 16 18
6.	FORI	EST MAN	NAGEMENT STANDARD	22
	6.1 6.2		l Remarks s Results	22 23
		 6.2.1 6.2.2 6.2.3 6.2.4 6.2.5 	Criterion 1 – Enhancement of Forest Resources and their Contribution to the Global Carbon Cycle Criterion 2 – Maintenance of Forest Ecosystem Health and Vitality Criterion 3 – Maintenance and Encouragement of Productive Functions of Forests Criterion 4 – Enhancement of Biological Diversity Criterion 5 – Enhancement of Protective Functions in Forest	23 25 26 26
		6.2.6 6.2.7	Management Criterion 6 – Maintenance of Socio-economic Functions Criterion 7 – Legal Compliance	27 28 31
7.	CHAI	N OF CL	JSTODY CERTIFICATION	32
8.	PEFC	C LOGO	USAGE	32
9.	CER	TIFICATI	ON AND ACCREDITATION PROCEDURES	34
	9.1 9.2		quirements for Certification and Accreditation tion of Certification Bodies	34 34
10.	COM	PLAINTS	S AND DISPUTE PROCEDURES	35
11.	STAK	KEHOLD	ER SURVEYS	36
			tional PEFC Consultation older Questionnaire	36 36

i



LIST OF FIGURES

Figure 3.1	Structure of the SFI 2015–2019 Forest Management Standard	7
Figure 5.1	Organization of SFI Standard Revision	17
Figure 5.2	Composition of the Forest Management Task Group	19
Figure 5.3	SFI Standard Revision Process	20

LIST OF TABLES

Table 4.1	Referenced PEFC Documentation	11
Table 4.2	SFI 2015–2019 Standards and Rules	12
Table 4.3	SFI Descriptive and Other Documents*	13
Table 4.4	Assessed Elements and Core Issues	14
Table 6.1	Ratification Status of Fundamental ILO Conventions in North America	29
Table 11.1	Summary of Comments of Stakeholder Consultation	36

LIST OF BOXES

Box 4.1	Assessment Scales Used in Conformity Evaluation	15
Box 6.1	SFI 2015–2019 Forest Management Standard Principles	22
Box 6.2	Forest Management Standard Objectives	23

LIST OF APPENDICES

Appendix 1	Indufor Assessment on the SFI Conformity with PEFC Checklist
	(PEFC IGD 1007-01:2012)
Appendix 2	List of Stakeholders in the Forest Management Task Group
Appendix 3	Summary of Stakeholder Replies
Appendix 4	Comments of Panel of Experts



ABBREVIATIONS

ANAB	ANSI-ASQ National Accreditation Board in the US
ANSI	American National Standards Institute
BMP	Best management Practices
CoC or C-o-C	Chain of custody
ENGO	Environmental Non-Governmental Organization
ERP	External Review Panel
FMU	Forest Management Unit
FPIC	Free Prior Informed Consent
GMO	Genetically Modified Organisms
I	indicator
IAF	International Accreditation Forum
ILO	International Labour Organization
ISO	International Organization for Standardization
MLA	Multi-Lateral Agreement
0	objective
OSHA	US Occupational Safety and Health Administration
PEFC	Programme for the Endorsement of Forest Certification Schemes
PEFC GD	PEFC Guidance document
PEFC ST	PEFC Standard
PM	performance measure
SCC	Standards Council of Canada
SIC	Standard Implementation Committee
SFI	Sustainable Forestry Initiative
SFM	Sustainable forest management
UN	United Nations
UNDRIP	UN Declaration on the Rights of Indigenous People
US	The United States of America
WG	Working Group



PREFACE

This report provides an independent conformity assessment on the revised forest certification procedures in the Sustainable Forestry Initiative (SFI) Programme with the requirements of the PEFC Council. The report provides information for the PEFC Council for its endorsement decision.

The report or its information may not be used for other purposes. PEFC Council has the right to publish the final version of the report on the Council's Internet site.

CLIENT

Name	PEFC Council
Contact person	Mr Christian Kämmer
Address	Case Postale 636 CH-1215 Genève 15 Switzerland
Telephone	+41 22 799 45 40
Email Website	christian.kammer@pefc.org www.pefc.org

INDUFOR OY

Contact person	Ms Hanna Nikinmaa
Address	Töölönkatu 11 A 00100 Helsinki 10 Finland
Telephone	+358 40 900 16 94
Email	hanna.nikinmaa@indufor.fi
Website	www.indufor.fi



1. INTRODUCTION

1.1 Objective and Scope of the Assessment

The Sustainable Forestry Initiative (SFI) program was initiated in 1994 and by 1998 it developed elaborated its first forest management standard. SFI Inc. is governed by the Board of Directors comprising of 18 members representing economic, environmental and social interests in three chambers. The SFI 2015–2019 standards and rules were adopted on November 5, 2014 and submitted for the PEFC endorsement on September 30th, 2015. This is the third assessment of revised SFI documentation by the PEFC Council.

The objective of the assessment is to verify the compliance of the SFI 2015–2019 standards and rules with international PEFC requirements. The assessment will cover SFI procedures and processes for standard setting, scheme implementation, certification arrangements and performance requirements for forest management. SFI program strongly promotes its own chain of custody standard and SFI labelling. However, it also issues PEFC labels in the US and in Canada under certain conditions. The review addresses the SFI provisions for PEFC chain of custody certification and PEFC labelling to the level that ensures that the PEFC logo use licenses are issued in line with PEFC requirements.

The assessment report will provide sufficient information as well as professional and objective conclusions on the compliance of different SFI program elements with PEFC requirements. The report will provide a basis for the decision-making process of the PEFC Council on possible endorsement of the Sustainable Forestry Initiative (SFI) program.

1.2 Assessment Process

The assessment process included the following phases:

1. International public consultation

The international public consultation organized by the PEFC Council was held in November 2015 – January 2016. No comments were received during the consultation.

2. National consultation of interested parties

Indufor sent out a questionnaire on standard setting process to 51 parties, which had participated in the standard development. SFI Inc. gave the original contact list. The objective of the consultation was to verify that the planned procedures were implemented and the principles of open access, fair decision making, consensus building and availability of grievance procedures were respected.

The questionnaire was sent out on February 18th, 2016 and 12 replies were received. A compilation of the comments received during the consultation is presented in Table 11.1 (p. 36) and the more detailed replies to the questions are available in Appendix 3.

3. Desk study

The desk study on the conformance of SFI 2015–2019 standards and rules to PEFC requirements was made using the PEFC Checklist (PEFC IGD 1007-01:2012) as a reference template and the references to SFI documentations given by the SFI Inc. as a reference guide. Evidence on conformity was verified from the original SFI documentation or another documents referenced by SFI Inc. In the cases where the referred SFI document did not provide satisfactory evidence on the conformity to PEFC requirements, SFI Inc. was requested to provide additional information.

4. Elaboration of draft report

Draft report was sent to the PEFC Council and SFI Inc. on March 12th, 2016. The draft report presents as non-complying all the PEFC requirements that lack adequate evidence on conformity by the SFI. At this stage non-conformities were not classified into minor or major non-conformities.



SFI was requested to provide comments and further information during the field visit carried out in March 29–31, 2016.

5. Elaboration of the final draft report

SFI Inc. provided substantial clarifications and additional information an on the nonconforming issues. The information was taken into consideration when deciding on the conclusions on conformance in the final draft report.

The final draft report was sent to the PEFC Council on May 10th, 2016. The PEFC Council submitted it to the Panel of Experts for review.

6. Review of the Panel of Experts

The Panel of Expert provided its comments on June 10th, 2016.

7. Elaboration of the final report

The assessor reviewed and took into consideration all the substantial and editorial comments given by the members of the Panel of Experts. The changes made to the final report and other explanations are summarized in Appendix 4.

1.3 Report Structure

Chapter 1 describes the objective and process of the conformity assessment.

Chapter 2 states the Indufor's recommendation to the Board of the PEFC Council on the endorsement of the SFI 2015–2019 standards and rules.

Chapter 3 describes a summary of findings and gives justifications for the given recommendation.

Chapter 4 presents the assessment method and material used.

Chapter 5 describes the structure of the SFI program and the revision procedures. It also evaluates how the written procedures were implemented in the revision process.

Chapter 6 describes the requirements of the SFI 2015–2019 forest management standard in view of PEFC requirements.

Chapter 7 comments on SFI arrangements for PEFC chain of custody certification

Chapter 8 address the SFI regulations on the use of the PEFC logo.

Chapter 9 reviews the SFI requirements for certification and accreditation procedures including notification of certification bodies.

Chapter 10 reviews procedures for complaint and dispute resolution and their application in practice.

Chapter 11 summarizes the received stakeholder comments and explains their consideration in the assessment.

Appendices provide detailed information on the assessment. The most relevant is Appendix 1 describing assessor's conclusion on the SFI 2015–2019 conformity to each PEFC requirement and lists the reference documents that provide the basis for the conclusion.



2. **RECOMMENDATION**

The recommendation of Indufor is that PEFC Council endorses the revised SFI 2015–2019 forest certification standard and procedures and PEFC labelling procedures¹, taking into consideration the following comments that justify the conclusions and request for improvement in compliance with the PEFC rules.

Comments

The following comments give additional information on the conformity of SFI 2015–2019 standards and rules with specific PEFC requirements and justify the confirming conclusion made by the assessor:

1. Public announcement of the beginning of the standard setting and invitation to participate, including a reference to standard setting procedures (PEFC Checklist Part I 5.3.e, p. 20):

During the second consultation public was asked to comment on standard setting procedures. At that point the first draft standard version was already published. The standard setting procedures were part of the revised SFI 2015–2019 Standards and Rules that were submitted for public consultation in the second consultation round. The first consultation round collected ideas for improvement of the old standard. Public had access to the earlier standard setting procedures of the year 2010.

The assessor concluded that public still had adequate access to comment and contribute to the development of standard setting procedures.

- 2. The SFI 2015–2019 Standards and Rules do not set any provisions for <u>pilot testing</u> (c.f. PEFC Checklist Part I 5.7). In the third international SFI revision pilot testing was not relevant but the SFI Program should set generic rules on pilot testing, that would indicate in which types of revisions or amendments testing should be considered.
- 3. Regarding the <u>publication of summary information on forest management plans</u> (ref. Appendix 1 PEFC Checklist Part III 5.1.6, p. 43), the SFI standard requires that certification bodies disclose information on forest management in certified entities. This arrangement does not risk that a certified forestry organization is claimed for violating the Antitrust legislation.

The audit reports include general description of forest resources and planned activities, e.g. area and location certified and general management strategies on the area. SFI should further guide certification bodies to disclose relevant information. This would harmonize the variable level of information currently provided.

4. SFI 2015–2019 Standards and Rules require that auditors and audit procedures in forest management certification comply with the ISO 17021 standard on *Requirements for bodies providing audit and certification of management systems* but the SFI does not make reference to ISO 19011 guidelines as required by the Appendix 1 on PEFC Checklist (Part IV 8 and 13, p. 113, 115).

The assessor concluded that the SFI requirements for auditors and audit procedures are compliant because ISO 17021 sets ISO 19011 compatible requirements for certification bodies, auditors and audit procedures. ISO 17021 is the reference standard used by accreditation bodies, whereas ISO 19011 is a guideline intended to help certification bodies to develop their procedures.

 SFI 2015–2019 Standards and Rules do not explicitly require <u>notification of certification</u> <u>bodies</u>. However, SFI Inc. makes notification contracts with certification bodies doing certification against the international PEFC chain of custody standard (PEFC ST 2002:2013) or SFI 2015–2019 SFM standard. The contracts are made for one year at a time.

¹ The relevant documents of SFI 2015–2019 Standards and Rules are listed in Table 4.2 on page 12.



The SFI Program has notification procedures that conform to the PEFC requirements, but the Program should inform on them in publicly available documentation describing the requirements for certification bodies. The contract defines the notification conditions that are non-discriminatory (ref. Appendix PEFC Checklist Part IV 26–27, 1 p. 120–121).

6. SFI 2015–2019 Standards and Rules do not address the <u>issuance of PEFC logo use</u> <u>licenses</u>, although SFI Inc. is responsible for the issuance of PEFC logo license in the US and in Canada, if the applicant also has SFI certified forests in Canada. In Canada, PEFC Canada issues logo licenses for the applicants that are not SFI certificate holders.

Being the PEFC governing body in the US, SFI Inc. is committed, through the contract with PEFC Council, to comply with PEFC document on Administration of the PEFC Scheme (PEFC GD 1004:2009) and consequently with PEFC ST 2001:2008 on Logo Use Rules.

SFI should describe and make publicly available the procedures and conditions of logo licensing and logo use. Currently companies are encouraged to contact the SFI's Office of Label Use and Licensing on the issue (ref. Appendix 1 PEFC Checklist Part VI 2, p. 124).



3. SUMMARY OF FINDINGS

3.1 Assessment Scope

The SFI conformity assessment for PEFC endorsement covers revision and content of the SFI Standard for Forest Management and related certification and accreditation arrangements.

SFI provisions for group certification of small holders is not part of the present assessment.

SFI provisions for PEFC chain of custody and labelling in order to collect evidence on appropriate procedures for PEFC logo licensing.

SFI forest management certification and related PEFC chain of custody certification and PEFC labelling procedures are applicable in the US and Canada, which is taken into consideration in the assessment.

3.2 General Scheme Structure

The Sustainable Forestry Initiative (SFI) program is managed by the SFI Inc. It is supported by forest industry organizations but it aims at a balanced representation of different interest groups in its administrative bodies. The SFI Board of Directors has 18 members that represent economic, social and environmental interests in a balanced way. The SFI Staff (Secretariat) has good resources to operate and develop the SFI Program. Different geographies in the US and Canada are well represented in the different administrative bodies and the local level outreach is good through SFI Implementation Committees. The Committees support awareness raising, capacity-building and address reported non-conforming actions at a local level.

Forest management organizations operating on public or private lands are the applicants of the SFI forest management certificate. Because SFI provisions for group certification are not part of the assessment, PEFC endorsed certification applies only to SFI certificates issued to individual applicants. The applicants for forest certificate shall conform to the SFI 2015–2019 Forest Management Standard and those applying for chain of custody (under PEFC) to the international PEFC chain of custody standard (PEFC ST 2002:2013).

The SFI has own standards for chain of custody and SFI labelling, as well as for group certification of small holders but this assessment does not cover these elements of the SFI Program.

The SFI Program requires that a notified certification body, that is accredited by a member of the International Accreditation Forum, carries out certification audits. SFI maintains a list of notified certification bodies.

3.3 Standard Setting Procedures and Processes

SFI Inc. is a legal entity responsible for standard revision. Standard setting rules set robust requirements for organization, administration, documentation, stakeholder participation and consensus-building in a standardization process. Principles of participation and transparency are cross-cutting issues in the standard revision.

Stakeholders had a good access for <u>consultation</u> i.e. suggesting improvements before and during the standard drafting. Consultation on draft standard is carried out aligned with PEFC requirements.

Stakeholder <u>participation</u> in standard drafting and decision making is more restricted but still respects the balanced representation of different interests. The standard drafting is done in the Forest Management Task Force (Task Group) that has 15 members, invited and volunteered for the task. The SFI Board approves the final standard. Prior to the approval the Board has a mandate to do changes to the standard proposal. The PEFC requirements for consensus-based decision-making apply to the Task Group and the SFI Board.



The SFI Task Group and the SFI Resource Committee address each comment presented by stakeholders in the two consultation rounds. The comments and conclusions on their consideration are available on the SFI website.

The Independent External Review Panel (ERP) reviews the proper standard setting process and stakeholder comments. Its task is to communicate to the SFI any discrepancies or needs for improvement in the process.

The SFI uses Internet, media (press releases) and email contacts to disseminate information on standard setting. The SFI 2015–2019 Standards and Rules were posted on the SFI website in January 2015.

The standard revision started in June 2013 with the first public consultation on improvement needs. The draft standard was sent out for public consultation in January to March 2014, and the revised standard was approved by the SFI Board in January 2015.

The standard revision procedures and processes comply with PEFC requirements taking into consideration the following two comments:

1. Public announcement of the beginning of the standard setting and invitation to participate, including a reference to standard setting procedures (PEFC Checklist Part I 5.3.e, p. 20).

Public was asked to comment on standard setting procedures in the second consultation when the first draft standard version had been already published. The standard setting procedures were part of the revised SFI 2015–2019 Standards and Rules that was submitted for public consultation in the second consultation round. The first consultation round collected ideas for improving the old standard.

The assessor concluded that public still had adequate access to comment and contribute to the development of standard setting procedures.

 The SFI 2015–2019 Standards and Rules do not set any provisions for pilot testing (c.f. PEFC Checklist Part I 5.7). In the fifth SFI revision pilot testing was not relevant but the SFI Program should set generic rules on pilot testing, that would indicate in which types of revisions or amendments testing should be considered.

3.4 Forest Management Standard

The SFI 2015–2019 Forest Management Standard sets 37 performance measures and 101 indicators that are grouped under 15 objectives for sustainable management of forests. In addition, 13 principles guide the development of forest management policies in certified organizations.

The objectives set very generic requirement to enhance management under one element of sustainable forest management. The 37 performance measures can be considered to be the criteria that set targets applicable at a level of a forest management organization. The indicators set mostly detailed procedural requirements for programs and procedures certified organizations shall develop in order to address the required SFM elements. Audits will cover all three levels of the requirements and together they form an auditable set of requirements (Figure 3.1).

The SFI 2015–2019 Forest Management Standard is largely a management system standard that requires applicants to develop programs e.g. on i) forest health; ii) seedling improvement, iii) protection of water quality by using best management practices, iv) protection of threatened and endangered species, v) conservation of sites for significant species of concern and vi) protection of forests with exceptional conservation values. Development, implementation and monitoring of outcomes of these programs ensure sustainable management that is well adapted to local conditions.



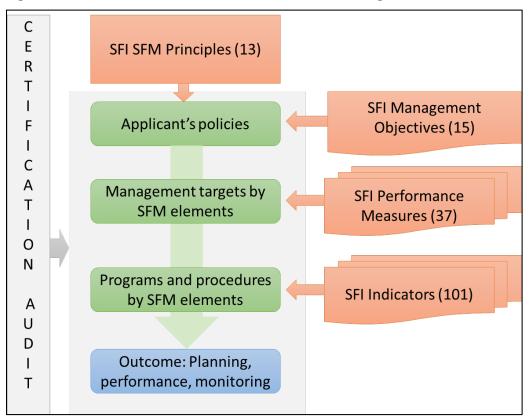


Figure 3.1 Structure of the SFI 2015–2019 Forest Management Standard

In addition, the performance measures and indicators include prescriptive requirements e.g. on reforestation, harvesting and chemical use that set explicit performance requirements.

Compliance with federal, state/provincial² and lower level legislation is a baseline in standard implementation.

The forest management standard requirements comply with the PEFC requirements with the following comment:

3. Regarding the publication of summary information on forest management plans (ref. Appendix 1 PEFC Checklist Part III 5.1.6, p. 43), the SFI standard requires that certification bodies disclose information on forest management in certified entities.

The US Antitrust legislation restricts the publication of business information typically presented in a forest management plan. In order to comply with the legislation, SFI asks certification bodies to provide a general description in audit reports, including forest resources and planned activities, e.g. area and location certified, and general management strategies on the area. With this arrangement a certified forestry organization is not in risk to be claimed for violating the Antitrust legislation.

However, the level of information varies between audit reports. SFI should guide certification bodies on disclosing forest management plan related information, which would lead to more harmonized and better quality information on management objectives and planned activities.

² States in the US; Provinces in Canada



Detailed information on the compliance of the SFI 2015–2019 Forest Management Standard is presented in Appendix 1, Part III. A summary on the SFI conformance with the PEFC ST 1003:2010 is presented in Section 6.2 of this report.

3.5 Certification and Accreditation Procedures

SFI Forest Management Certification

The assessment covers certification and accreditation procedures that relate to certification of compliance with the SFI 2015–2019 Forest Management Standard.

SFI requires that certification is done by independent third parties that have an accreditation for specific SFI certification from a national accreditation body, i.e. the National Accreditation Body (ANAB) in the US and the Standards Council of Canada (SCC) in Canada. Both accreditation bodies are members and signatories to the Multilateral Agreement of International Accreditation Forum (IAF) as required by the SFI and PEFC procedures.

According to the SFI Program, certification bodies doing forest management certification shall be accredited in line with the ISO 17021 *standard for accreditation of certification bodies doing management system certifications*.

PEFC Chain of Custody Certification

SFI has its own chain of custody standard that is not part of this assessment. SFI recognizes chain of custody certifications on compliance with the international PEFC chain of custody standard (PEFC ST 2002:2013).

The SFI requirements for certification bodies doing chain of custody certification in compliance with the international PEFC chain of custody standard (PEFC ST 2002:2013) are stated in SFI confidential notification contracts with certification bodies eligible to provide SFM and/or chain of custody certification. The studied contracts require that certification bodies and procedures comply with the PEFC ST 2002:2013.

In the PEFC chain of custody certification the accreditation shall be obtained from the American National Standards Institute (ANSI) in the US or the SCC in Canada. These two bodies issue accreditations based on the ISO 17065 *standard for requirements for bodies certifying products, processes and services.*

Certification and Accreditation Procedures in the SFI Program conform to the PEFC requirements with a comment:

4. SFI 2015–2019 Standards and Rules require that auditors and audit procedures in forest management certification comply with the ISO 17021 standard on Requirements for bodies providing audit and certification of management systems, but the SFI does not make reference to ISO 19011 guidelines as required by the Appendix 1 on PEFC Checklist (Part IV 8 and 13, p. 113, 115).

The assessor concluded that the SFI requirements for auditors and audit procedures are compliant, because ISO 17021 sets ISO 19011 compatible requirements for certification bodies, auditors, and audit procedures. ISO 17021 is the reference standard used by accreditation bodies, whereas ISO 19011 is a guideline intended to help certification bodies to develop their procedures.

3.6 Notification of Certification Bodies

The SFI Program does not describe notification procedures in publicly available scheme documentation. In any case SFI Inc. makes notification contracts with certification bodies. The confidential contracts define responsibilities of both parties as appropriate. SFI Inc. publishes a list of notified, i.e. approved certification bodies on its website.

Notification procedures conform to PEFC requirements with a comment:



5. SFI 2015–2019 Standards and Rules do not explicitly require publishing of notified certification bodies. However, SFI Inc. makes notification contracts with certification bodies doing chain of custody certification in compliance with the international PEFC chain of custody standard (PEFC ST 2002:2013) or forest management certification in compliance with the SFI 2015–2019 SFM standard. The contracts are made for one year at a time.

The SFI Program has procedures to notify certification bodies that conform to PEFC requirements, but the Program should make them publicly available in its documentation on the requirements for certification bodies. The contract defines the notification conditions that are non-discriminatory (ref. Appendix 1 PEFC Checklist Part IV 26–27, 1 p. 120–121).

3.7 PEFC Logo Licensing and Logo Use

SFI Inc. is the PEFC Governing body in the US and it is committed, through a contract with the PEFC Council, to comply with PEFC rules on Administration of the PEFC Scheme (PEFC GD 1004:2009). This document obliges to conform to PEFC logo licensing rules (PEFC ST 2001:2008). SFI Inc. signs PEFC Logo Usage Contracts with logo users that comply with the terms of the contract. The applicant shall conform to PEFC ST 2001:2008 that is attached to the contract. PEFC ST 2001:2008 requires that a logo license holder has a valid accredited forest management and/or chain of custody certificate that is issued against the PEFC international chain of custody standard (PEFC ST 2002:2013).

SFI Standards and Rules or other Program documents do not describe or make reference to the PEFC logo licensing or rules. SFI advises applicants to contact the SFI Office of Label Use & Licensing and consult the SFI website. The compliance with the PEFC rules is set through i) contracts between SFI Inc. and PEFC Council on Administration of PEFC Scheme and ii) contracts between SFI Inc. and logo license holder of PEFC Logo.

SFI is a PEFC logo licensing body for applicants that have the SFI forest management and/or PEFC chain of custody certificate in the US. In Canada the applicant shall have both certificates. PEFC Canada issues logo licenses if applicant has only a PEFC chain of custody certificate.

The SFI Office of Label Use and Licensing administers the label use. Through the SFI Inc. contract with PEFC Council it is committed to comply with PEFC GD 1004:2009 that states: *licensing body shall have mechanisms for the investigation and enforcement of the compliance with PEFC Logo usage rules (PEFC ST 2001:2008)*. The requirement is enforced through PEFC Logo Usage Contract Article 7 stating: *The logo user, in case of user group B or C, shall undertake to provide, immediately after each chain of custody (C-o-C) or forest management certification audit, the SFI with <u>a notification, verified by the certification body, of the on-product use of the PEFC logo</u>...and that the logo user shall <u>supply the SFI with a detailed, free form account of any off-product use of the PEFC logo</u>. Thus, both the certification body and SFI control the logo use. SFI maintains a database on SFM and chain of custody certificate and PEFC and SFI logo license holders.*

The PEFC Logo licensing process and the procedures as defined in the contractual documents conform to the PEFC requirements. However, the SFI should take the following comment into consideration when improving the SFI documentation:

 SFI should describe the procedures and conditions on logo licensing and logo use in documents available for the public. Currently companies are encouraged to contact the SFI Office of Label Use and Licensing on the issue (ref. Appendix 1 PEFC Checklist Part IV 15, p. 116 and Part VI 2, p. 124).



3.8 Complaints and Dispute Resolution Procedures

In standard setting the SFI External Review Panel addresses any complaints.

In standard implementation and interpretation, the SFI Public Inquiries and Official Complaints procedures apply. The procedures are well defined and published and address complaints related to non-conforming activities identified by any party.

Complaints related to standard implementation are first discussed between a SFI Program participant and a certification body. If a satisfactory resolution cannot be made, the issue is communicated to local SFI Implementation Committees. The complaint is ultimately taken to the Board, if it cannot be resolved at the lower level decision making.

Complaints related to the certification process are dealt within the grievance procedures of the accredited certification body in question.

The complaints and dispute resolution procedures conform to PEFC requirements.



4. MATERIAL AND METHODS

4.1 **PEFC Documentation**

The following international PEFC standards and normative guidelines set the provisions for conformity to PEFC requirements. The assessment reviews in detail the conformity of the SFI standards and rules to specific PEFC requirements presented in the listed documentation (Table 4.1).

Table 4.1 Referenced PEFC Documentation

PEFC Document			
1. Standards setting			
PEFC ST 1001:2010, Standard Setting – Requirements			
2. Forest management and chain of custody certification			
PEFC ST 1003:2010, Sustainable Forest Management – Requirements			
PEFC ST 2002:2013, Chain of Custody of Forest Based Products – Requirements			
3. Implementation of certification and complaints procedures			
Procedures for complaints and dispute resolution: PEFC GD1004:2009, Administration of PEFC scheme, chapter 8			
4. Requirements for certification bodies			
Procedures for notification of certification bodies: PEFC GD1004:2009, Administration of PEFC scheme, chapter 5			
Certification and accreditation procedures, as defined in the PEFC Council Technical Document, Annex 6			
PEFC ST 2003:2012 (2 nd edition of 2014), Requirements for Certification Bodies operating Certification against the PEFC International Chain of Custody Standard			
5. PEFC Logo Usage			
Procedures for logo licensing: PEFC GD1004:2009, Administration of PEFC scheme, chapter 6			
6. Other documents			
A stakeholder survey to verify stakeholder invitation and participation in standard revision along with stakeholder views on process implementation			

The *PEFC Standard and System Requirement Checklist* (PEFC IGD 1007-01:2012) will provide a template for detailed assessment of conformity to specific PEFC requirements.

The SFI Program compliance with the following PEFC ST 1002:2010 on Group Forest Management Certification – Requirements <u>is not assessed</u> in this report, because SFI Inc. decided to exclude group certification standard from the assessment:

This study's original scope did not either include chain of custody certification and PEFC logo licensing, but assessor had to review SFI provisions for PEFC chain of custody and labelling in order to collect evidence on appropriate procedures for PEFC logo licensing.



4.2 SFI Program Documentation

The assessment will be based on the following documentation of the SFI Program (Table 4.2).

Table 4.2 SFI 2015–2019 Standards and Rules

Document	Section in the SFI 2015– 2019 Standards and Rules	
1. Standards		
SFI 2015–2019 Forest Management Standard	Section 2	
2. Administrative standards		
SFI Standard Development and Interpretation Process	Section 8	
3. Requirements for Certification Bodies		
Audit Procedures and Auditor Qualifications and Accreditation	Section 9	
4. Communication and Transparency		
Communication and Public Reporting	Section 10	
5. Procedures for Complaints and Inquiries		
Public Inquiries and Official Complaints	Section 11	
6. Supporting documents		
Guidance to SFI 2015–2019 Standards and rules	Section 6	
SFI Policies	Section 7	
Optional Modules	Section 12	
SFI Definitions	Section 13	

The Sections 2, 8, 9, 10 and 11, are normative SFI documents defining the required procedures for standard setting, forest management, qualification requirements for certification bodies and procedures for public communication, as well as procedures to address complaints and inquiries.

The descriptive and guiding documents provided by the SFI as appendices (Table 4.3) describe the implemented processes in the standard development.



Table 4.3 SFI Descriptive and Other Documents"	
Appendix number	Document
2	SFI Records Retention Policy
3	SFI 2015–2019 Standard Review Process
4	Standard Revision Task Group Rosters May 7th, 2014
5	2013 Stakeholder Mapping Exercise
6	Call Volunteers SFI 2015–2019 Standards Revision
7	SFI 2015–2019 Standards Revision Task Group Expectations
8	SFI Press Release on reaching out to 10,000 stakeholders for standard revision
9	SFI Seeks Input for Standard Revision January 7th, 2014
10	SFI Standard Revision Second Comment Period Invitation to Comment
11	Email to Stakeholders January 6 th invitation to comment
12	April 2–3 F2F Full Meeting Package
13	Redline versions Forest Management Face to Face Meeting
14	Briefing Note-SFI 2015–2019 Standard Revision
15	SFI 2015–2019 Program Requirements Revision Process – October 16th, 2013
16	SFI Standard Review Workshop Vancouver, BC Canada January 22 nd , 2014
17	SFI 2015–2019 Standard Review Webinar
18	What's New for 2015–2019-SFI
19	SFI Board Meeting Minutes-November 5 th , 2014
20	SFI Board of Directors Conference Call AGENDA November 5th, 2014
21	Guide to SFI 2015–2019 Standards
22	SFI Standard Launch release 1 7 15 FINAL Embargoed
23	SFI Small Lands Group Certification Module (not in the scope of the assessment)
24	PEC CoC Fee Summary One Pager (not in the scope of the assessment)
25	PEFC US Logo Use Contract Sample (not in the scope of the assessment)
26	Summary of US and Canadian Legislation Pertaining to Forest Management
Contract	Examples of PEFC Notification Contracts between SFI Inc. and certification bodie
Contract	Examples of PEFC Logo Usage Contracts between SFI Inc. and certificate holder
Contract	Copy of the contract on Administration of PEFC Scheme signed between SFI Inc. and PEFC Council.
Analysis	Independent lawyer analysis on the ILO core Conventions and the US labor legislation
Internet	http://www.sfiprogram.org/

Table 4.3 SFI Descriptive and Other Documents*

* The documents are given as appendices to the application or provided later by the SFI Inc.

The PEFC Checklist compiled by the SFI Inc. is used as a reference base to look for specific evidence from the documentation.

The SFI has provisions for fiber sourcing, SFI chain of custody certification and SFI labelling (sections 3 and 4 and SFI Appendices 24, 25). These SFI Program specific standards are not part of the endorsement request and thus not covered by this assessment. In addition, standards on SFI's Small Lands Group Certification Module (SFI Appendix 23) for group forest management certification are also not part of this assessment.



4.3 Methods

This conformity assessment presents the consultant's conclusions on the conformity of the selected parts of the SFI Program to PEFC requirements. The conclusions are based on the available evidence. Conformity to the PEFC requirements would ensure that the scheme is developed in line with PEFC requirements and that it can be managed and implemented in a consistent and reliable way. The assessment covers scheme development and provisions for scheme implementation as described in Table 4.4.

Element	Core issues
Standard setting	 Stakeholder participation Transparency Consensus building Consistency in planned procedures and in their implementation
Criteria for forest management (SFI standard)	 Performance requirements Practical applicability of the criteria considering natural conditions, forest tenure, organizational and administrative structures Auditability of compliance with the criteria
Certification arrangements (individual certification)	 Applicability and governance of planned arrangements Reliability of arrangements to deliver full conformance to the scheme requirements Methods to indicate certification status
Certification and accreditation procedures	 Requirements set for certification bodies and procedures: competence requirements, independence and impartiality Applied procedures Access for CBs to enter into the market Compliance of scheme provisions with PEFC requirements Availability of eligible accreditation body to provide the service
PEFC Labelling	 Provisions for issuance of PEFC Logo licenses and control of Logo usage

 Table 4.4
 Assessed Elements and Core Issues

The assessment is based on (i) the documentation listed above, (ii) on the feedback received from the stakeholders and (iii) on the additional information provided by the SFI Inc. Indufor sent a questionnaire on standard setting process to 51 parties that participated in the process in working groups or decision making bodies. The questionnaire is presented in Appendix 3 to this report. The reply rate was 24% with 12 replies received.

The results and conclusions on the conformity are presented in detail in Appendix 1 where the SFI Program compliance with each requirement of the PEFC Council Checklist is assessed. For standard setting, the assessment includes separate conclusions for procedures and applied processes, i.e. rules for standard setting and the processes implemented in standard setting in practice.

The following grading of conformity levels are used in this final report (Box 4.1).



Box 4.1 Assessment Scales Used in Conformity Evaluation

Conformity

A procedure or process described by the scheme documentation fully meets the particular requirement of PEFC Council.

Conformity with a comment

A procedure or process described by the scheme (SFI Program) documentation fully meets the particular requirement of PEFC Council, but assessor wants to communicate essential information that e.g. supports the conclusion or makes requests for improvements.

Minor non-conformity

A minor non-conformity does not violate the integrity of the certification scheme, and is not a bar to endorsement. The assessor recommends appropriate corrective action. Generally, a minor non-conformity should be corrected within 6 months. The assessor may recommend a longer period when justified by particular circumstances.

Major non-conformity

A major non-conformity violates the integrity of the certification scheme and has to be corrected before the endorsement of the scheme (SFI Program).

N.A. Not applicable.

Only a positive conclusion on the conformity is considered to meet the PEFC requirements. A positive conclusion on conformity may be accompanied with a comment if the assessor wants to disclose information that the PEFC Board should be aware of when deciding on the endorsement.

The SFI requirements indicating minor or major non-conformities do not meet the performance level the PEFC demands from an endorsed scheme.

Some PEFC requirements were classified as not applicable e.g., if they address a scheme development phase that is not relevant for the SFI (i.e., testing of revised standard or requirements for scheme revision or dispute resolution process in the case where no disputes have been raised during revision).

The conformity assessment process is described in Section 1.2.



5. STRUCTURE OF THE SUSTAINABLE FORESTRY INITIATIVE PROGRAM

5.1 Scheme Organization

The SFI Inc. manages the Sustainable Forestry Initiative (SFI) Program. The SFI Program includes standards for forest management, fiber sourcing, and chain-of-custody. The Program is led by an 18-member Board of Directors that has a balanced representation of economic, social, and environmental interests. The Program aims at a balanced representation of different interests also in other committees. Unlike most other certification schemes the SFI Program has an independent External Review Panel (ERP) serving since 1995. It has the responsibility to review the Program revision processes and consideration of stakeholder comments in it. The ERP elects its own members who have expertise in conservation/environment, academic/professional forestry or represent relevant public agencies.

The SFI Secretary has an office in Washington D.C., but operates across the US and Canada. The Program has an excellent outreach through SFI Implementation Committees to all US states and Canadian provinces where SFI certification is present. The SFI Secretary has good resources to manage the program and support its development.

An ad hoc Standard Development Task Group was convened for the revision of the SFI 2015–2019 Forest Management Standard. The Task Group represents materially and directly affected program participants (i.e. certificate holders) and other interested stakeholders.

5.2 Standard Setting and Revision Procedures

The Section 8 of the SFI 2015–2019 Standards and Rules defines in detail the procedures and processes for the SFI standard development and revision. SFI standards shall be revised every five years. The standard development is independent from certification procedures and it is done by stakeholders representing different interests in the US and Canada.

The SFI is responsible for publishing information regarding the standard development process, i.e., mapping stakeholders, informing publicly about the standard revision process, sending out invitations to stakeholders, organizing public consultations and publishing the revised standards.

The SFI Board of Directors (18 members) makes a decision on approval and adoption of standards and rules within the SFI Program. The organization of the standard revision is illustrated in Figure 5.1.



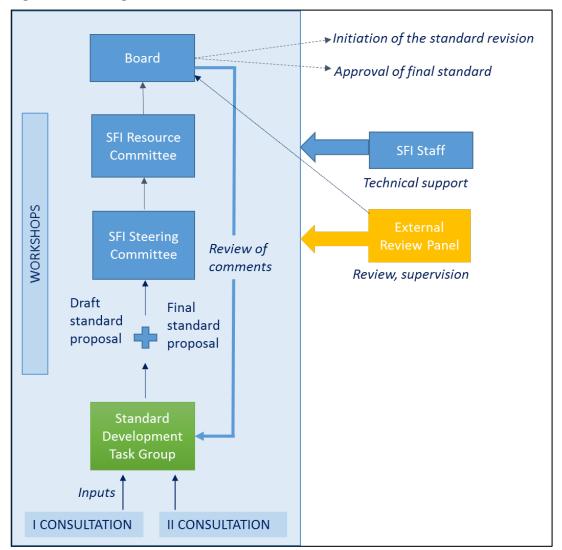


Figure 5.1 Organization of SFI Standard Revision

The standard drafting is done by Standard Development Task Group (15 members). SFI Steering Committee nominated by the heads of all SFI Task Groups and the head of the SFI Resource Committee support the Task Group in consideration of comments received. The Resource Committee reviews the standard before submitting it to the Board for approval.

The SFI aims at a balanced participation of different interest groups at all levels of program administration and standard revision. The Board has three chambers representing economic, social, and environmental interests and the same structure is mirrored in the Board nominated committees. Different interest groups shall be also invited to the Standard Task Group.

Transparency in the Review Task Groups is maintained by publishing relevant material on the SFI website. Different stages of the revision process were communicated to the public through the SFI website and regional workshops. The Review Task Groups shall aim at decisions based on ISO and PEFC definitions of consensus.

The record keeping and decision-making procedures related to standard development are well-described.



The whole process of the standard development or revision is closely monitored by the External Review Panel (ERP) in order to ensure that all external comments are taken into consideration and that the process is carried out in line with rules respecting impartiality and transparency. The ERP also addresses complaints related to the standard revision process.

The SFI standard revision procedures have exceptionally two rounds of public consultations. In the first one, all stakeholders identified as the result of stakeholder mapping (> 9 000 in total) are asked to propose improvements and comments to the old standard in force. The request for comments launches the standard revision process. Comments can also address the standard development procedures. The comments received set the basis for standard revision. The scope of the second public consultation round is on the relevant sections of the SFI Standards and Rules including the draft standard and standard setting procedures.

The SFI Standard revision procedures conform to the PEFC requirements.

Appendix 1 Part I p. 5–35 describes in detail the conformity of SFI standard setting procedures with PEFC requirements.

5.3 Forest Management Standard Revision Process

The standard setting processes for the revision of the SFI 2015–2019 forest management standard are described in Section 8 of the SFI 2015–2019 Standards and rules. Section 8 documents different stages of the revision process. A detailed analysis of the SFI conformance with PEFC requirements is presented in Appendix 1 p. 5–35.

The standard development was launched in March–April 2013 with the stakeholder mapping exercise. Over 9 000 people representing different interests were identified to be potentially interested in participating in the revision of the SFI forest management standard. During the first consultation round a large group of stakeholders were asked to comment on the old standard and in the second consultation – to comment on the new draft standard.

On June 11th, 2013, 240 stakeholders among the SFI Program participants received email with a request to appoint volunteers for the Forest management Task Group. An online request was published on the SFI website a week earlier – on June 5th, 2013.

SFI Inc. informed that the national stakeholder consultation did not record refusal of any application for Task Group nomination. The Forest Management Task Group included 15 experts and had a rather balanced representation of different stakeholders (Figure 5.2), including interest groups that were not SFI Program participants, i.e. certificate holders:



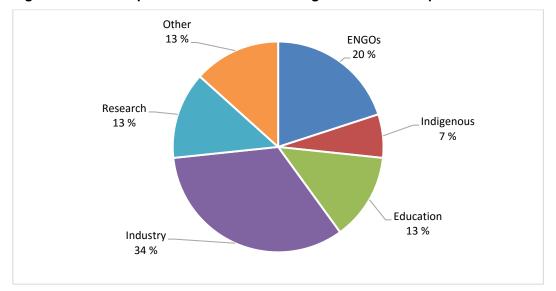


Figure 5.2 Composition of the Forest Management Task Group

Compilation of initial comments and preparation of the first draft took place in August-September of 2013. In September 2013 two workshops were held in order to proceed with the work on the first draft (September 19th – the review workshop in the framework of the SFI annual conference and September 24–25 the Aboriginal and First Nations workshop). In mid-September, the ERP also met to check on the standard development process. The first draft was finalized in October-November 2013 and passed to the SFI Board for a review, which was done as part of the Board meeting held on December 5th, 2013 (see Figure 5.3).

The second consultation period started on January 6th, 2014 and it was published on January 7th, 2014 on the SFI website. Two weeks after, regional workshops were held in Vancouver, Edmonton and Portland in order to collect additional comments on the draft standards (January 22nd, 23rd and 28th respectively). In addition, four workshops were held in February 2014 in Charlotte, Memphis, Montreal and Portland and one more in March 2014 in Minneapolis (March 4th). SFI Inc. also organized a webinar on the draft standard in March 2014. Comments received during the workshops and online were processed during March and April and once more the ERP held a meeting in order to check on the standard development process (April 23–24, 2014).

The final draft elaborated during April-July 2014 was passed to the SFI Board on September 2nd, 2014 and was reviewed by the Board two weeks later. The consultation on the final draft lasted for subsequent 45 days and the SFI Board approved the final version of the SFI 2015–2019 Standards and Rules on November 5th, 2014. The ERP met in September to evaluate the progress of the standard development.

The SFI 2015–2019 Standards and Rules were published on the SFI website in January 2015. All the comments received during the two commenting periods and responses to them were available on the SFI website.





Figure 5.3 SFI Standard Revision Process

Standard Revision Body and Procedures/Processes

The SFI Board together with the Forest Management Standard Task Group have the key role in standard revision. They are independent from certification procedures and represent materially affected stakeholders. SFI procedures for standard setting as described in Section 8 to the SFI Standards and Rules conform to PEFC requirements on structure, decision making, and record keeping procedures. The SFI documentation uses the term "Forum" that refers to the SFI Board supported by the SFI Resource Committee.

Stakeholders can openly suggest improvements and comment on draft standards and the standard revision procedures. The Standard Review Steering Committee and ERP require comprehensive consideration of all comments. However, the Forest Management Task Group members drafting the standard are invited among a pool of program participants, i.e. certificate holders. In addition, representatives from nature-oriented non-governmental organizations, academic institutions and aboriginal people also participate in the Task Group. The SFI Board makes the decision on the standard approval (see Appendix 1 p.1–14, 16–23, 32).

The SFI made an assessment of potential disadvantaged stakeholders that would need additional support in order to participate in standard revision. The SFI concluded that French-speaking stakeholders in Quebec, Canada, would not be able to fully participate if the material was only in English. Thus, SFI decided to publish all relevant materials on SFI revision also in French and organize workshops in French in Quebec. Aboriginal people and other stakeholder groups had resources to participate in the revision without an additional contribution from SFI Inc. (see Appendix 1 p. 24).

The standard revision includes three consultations, where the second consultation on the draft standard conforms to the PEFC requirements. The invitation for commenting was sent out to over 9 000 stakeholders in the US and Canada. The stakeholders were identified as part of the stakeholder mapping exercise. Information on received comments and their consideration by the SFI is available on the SFI website (see Appendix 1 p. 25–27).

The standard revision procedures followed the procedures applied in the previous revision in 2010 and these were publicly available on the SFI website. The draft documentation of the standard setting procedures in the revised SFI 2015–2019 Standards and Rules were made publicly available during the second consultation, when stakeholders were asked to comment on them along with the SFI forest management standard draft.

The SFI aims at consensus-based decisions at all levels of decision-making. It defines consensus as following: "consensus... is a process that involves seeking to take into account the views of all parties concerned and to reconcile any conflicting arguments", "the SFI Standards development process is open, transparent and consensus based, and SFI Inc. Board decisions regarding final changes to the SFI Standards shall be consistent with PEFC ST



1001:2010 for consensus-based decision making..". SFI describes the consensus of the Board approval of the final standard: "A minimum of eighty percent of those present, which must include at least two representatives of each Sector [environmental, social, economic] is required to approve any action of the Board" (Appendix 1 p. 7, 28–31); SFI 2015–2019 Standards and Rules, Section 8).

Pilot testing was not relevant in this fifth revision of the SFI forest management standard (third under PEFC framework). The SFI documentation does not make any reference to pilot testing. Indufor raised a comment that the SFI documentation should define conditions for situations where pilot testing would be necessary, e.g. if SFI further develops a group certification standard or makes major revisions of the forest management standard (see Appendix 1 p. 27–28).

The dispute resolution procedures in standard revision are set on consensus-based decisionmaking, where the process shall take into account views of all parties. The ERP addresses complaints related to implementation of standard revision procedures. The ERP dispute settlement procedures are in line with the PEFC requirements (see Appendix 1 p. 14–16). No complaints were raised during the revision. The SFI complaints procedures described in Section 11 of the SFI 2015–2019 Standards and Rules apply only to complaints related to issued certificates.

Transition Period

SFI standard revision was completed within five years from the previous endorsement. SFI allows one-year transition period until January 2016 for implementation of the revised SFI 2015–2019 Standards and Rules, where the SFI forest management standard is presented in the Section 2. All new certification audits had to be based on the new documentation already in January 2015. The application and transition dates are given in the SFI 2015–2019 Standards and Rules Section 6 on guidance and in Section 8 on standard development (see Appendix 1 p. 35–36).

The standard revision procedures and processes conform to the PEFC requirements on standard setting as defined in the PEFC ST 1001:2010.



6. FOREST MANAGEMENT STANDARD

6.1 General Remarks

According to the SFI Inc., the SFI 2015–2019 Forest Management Standard applies to management of plantation and natural forests in the US and Canada. However, short rotation forest stands, e.g. fast growing eucalyptus plantations or agro-forestry stands are not within the scope of SFI certification³. The standard applies to any organization that owns or has a management authority on forest land. At this stage it is applicable only to individual organizations because SFI has not developed procedures for group certification.

The SFI standard has 37 Performance Measures (PM) and 101 Indicators (I) that set measurable requirements for a forest management unit. The requirements are grouped under 15 Objectives (O) set for sustainable forest management (Box 6.2). As a baseline requirement, certified forest organizations shall have management policies that respect the 13 SFI Principles (Box 6.1).

Box 6.1 SFI 2015–2019 Forest Management Standard Principles

A SFI Program participant shall have a written policy to implement and achieve the following principles:

- 1 Sustainable forestry
- 2 Forest productivity and health
- 3 Protection of water resources
- 4 Protection of biological diversity
- 5 Aesthetics and recreation
- 6 Protection of species sites
- 7 Responsible fiber-sourcing practices in North America
- 8 Legal compliance
- 9 Research
- 10 Training and education
- 11 Community involvement and social responsibility
- 12 Transparency
- 13 Continual improvement

³ SFI 2015–2019 Standards and Rules. Section 6: Guidance to SFI 2015–2019 Standards and Rules. <u>http://www.sfiprogram.org/files/pdf/2015-2019-standardsandrules-section-6-pdf/</u>



Box 6.2 Forest Management Standard Objectives

O1 Forest management planning

O2 Forest health and productivity

O3 Protection and maintenance of water resources

O4 Conservation and biological diversity

O5 Management of visual quality and recreational benefits

O6 Protection of special sites

O7 Efficient use of fiber resources

O8 Recognize and respect Indigenous Peoples' rights

O9 Legal and regulatory compliance

O10 Forestry research, science and technology

O11 Training and education

O12 Community involvement and landowner outreach

O13 Public land management responsibilities

The SFI standard for forest management is presented in the SFI 2015–2019 Standards and Rules, Section 2. The appendix 1 p. 37–107 of this report describes in detail the conformity of SFI 2015–2019 Forest Management Standard with specific PEFC requirement of the PEFC ST 1003:2010.

The SFI forest management standard is to a large extent a management system standard that requires a program with systematic planning, implementation and monitoring of a number of issues relevant to sustainable management of forests. The audits will focus on the full implementation of a standard requirement in addition to observed outcomes (see Figure 3.1 for illustration). In addition, the standard sets specific performance requirements.

The standard requirements are applicable to the intended range of different types of forests managed under different jurisdictions in the US and Canada. 101 indicators set auditable requirements that are applicable at levels of a forest management unit or an organization. Legal compliance is a required baseline for forest management. The standard also applies to all activities carried out in certified forests and requires full commitment by contractors operating in the forests (see Appendix 1 p. 37). SFI has strong procedures through SFI Program Implementation Committees to invest in capacity building and conformity monitoring at a local level. SFI also requires annual progress reports from certified entities.

The following section 6.2 presents a brief summary on the conformance of the SFI Forest Management Standard to the PEFC requirements. A detailed analysis is available in Appendix 1, p. 37–107.

6.2 Analysis Results

6.2.1 Criterion 1 – Enhancement of Forest Resources and their Contribution to the Global Carbon Cycle

Inventory and Planning

The SFI standard requires regular inventory and sets general requirements for forest management plans. The requirement on long-term resource analysis and a review of non-timber issues (PM1.1 I a, i) target a planning scope that also includes social and environmental elements and non-wood forest products. These two requirements, although expressed in very general manner in the standard, demand in practice, consideration of social and environmental impacts in planning. In addition, the standard requires systematic monitoring of timber and non-



timber resources. The planning cycle varies between the jurisdictions. Planning requirements for public forestry are generally stricter compared to private forest holdings (see Appendix 1 p. 40–42).

Although the standard does not explicitly require an assessment of social and environmental impacts, it addresses them through the provisions on resource analysis.

SFI requires that audit reports include a general description of forests and their management objectives. Thus, certification bodies are responsible for the information and its publication. This approach does not violate the strict Antitrust legislation in the US, that would prohibit any broader scale disclosure of information on forest resources and their planned use. The audit reports are available on the SFI website.

SFI Standards and Rules Section 10 on communication and public reporting outline the information that should be presented in audit reports including management policies and objectives. In practice, the level of information was very variable among the reports and did not always meet with the intent of the PEFC requirement 5.1.6.

SFI procedures on publication of the summaries conform to the PEFC requirements, but **Indufor raised a comment** that SFI should give more guidance on certification bodies to ensure more informative and harmonized summaries of forest management plans (see appendix 1 p. 44).

Silviculture

The standard does not specify any silvicultural methods in detail, because of the large and heterogeneous geographic area of application. The SFI standard is also a management system standard that requires program participants to develop internal targets and procedures on e.g. on forest health, seedling improvement, protection of water quality using best management practices, protection of threatened and endangered species, conservation of sites for significant species of concern and protection of forests with exceptional conservation values.

The standard sets procedural requirements for water and soil protection. The performance requirements are defined by state/province level best practices and/or organization level procedures (see Appendix 1 p. 47–48).

Conversion

The standard as such prohibits conversion to non-forest use and any conversion to other forest type requires an assessment including social and ecological aspects. The assessment requirement is comprehensive and the assessment is very likely to include consultations, although they are not singled out in the requirements. Regulations on land zoning, public land use at state/province and municipal levels apply on consultation and land use changes.

As conversion is prohibited in general, the standard does not address the size or positive impacts of conversion.

The Standard requirement "*in compliance with relevant national and regional <u>policy and</u> <u>legislation</u>" is interpreted to ensure that conversion shall be a result of national or regional landuse planning governed by a governmental or other official authority (see Appendix 1 p. 49–50).*

The SFI conforms to PEFC requirements on maintenance of forest resources as defined in PEFC ST 1003:2010 with the comment on publication of information on forest management plans.

See Appendix 1 p. 39–50 for a detailed analysis.



6.2.2 Criterion 2 – Maintenance of Forest Ecosystem Health and Vitality

Control of Damages

The SFI standard requires that certificate holders have a program to protect forests from damaging agents. In addition, forest management shall protect and maintain forest and soil productivity and take appropriate erosion control measures. The standard requires annual monitoring of progress in the Program to protect forests from damages. However, it does not specify the scope of the forest health monitoring program as defined by the PEFC (5.2.2), but it requires that the program includes and minimizes risks for <u>any</u> relevant damage (see Appendix 1 p. 52–52 for details).

Taking into consideration the large region of standard application, a broad range of health risks and the consistent management system structure of the SFI standard and its implementation, the general program requirements to minimize any health risks conform to the more detailed PEFC requirements.

Preventive Measures

The standard requires measures to maintain and improve biological diversity, and diverse structure of forests through silvicultural measures and by considering the role of natural disturbances. The use of exotic species shall be minimized. In addition, the requirement to apply recent information and to protect valuable sites sets elements of forest health protection programs (PM 2.4) that strengthen the natural ecosystem regulation and prevention of damages.

The risk of forest fires varies between regions and certificate holders shall when relevant, include fire protection into the program to protect forests from damaging agents. In high risk areas legal requirements on fire protection are strict (see Appendix 1 p. 55–57).

Waste Management

Standard requirements are procedural and refer to the waste management legislation. Standard requirements or regulations on the use of appropriate tree species and provenances are not clearly indicated, but these issues are most often regulated at a state or provincial level in the US and Canada.

Spillage of oil is illegal in the US and Canada. Detailed provisions regarding spills, disposal and waste are stipulated in the Best Management Practices programs on water protection. The Best Management Practices in water protection set mandatory requirements (see US Clean Water Act and Canadian Fisheries Act and Appendix 1 p. 57–58) and they are usually issued on state/provincial levels.

Pesticides

The standard requires minimization of the use of chemicals. Chemicals are regularly used in grass and coppice clearing, e.g. in plantation forestry when allowed and economically/ecologically and socially feasible.

States and provinces list chemicals that are approved for forestry use. Only licensed persons may apply chemicals.

The standard prohibits the use of most toxic chemical as defined in the PEFC ST 1003:2010 (see Appendix 1 p. 58–61).

The SFI conforms to PEFC requirements on forest health as defined in PEFC ST 1003:2010.

For a detailed analysis see Appendix 1 p. 51-62.



6.2.3 Criterion 3 – Maintenance and Encouragement of Productive Functions of Forests

Forest management planning shall aim at production of a comprehensive range of forest products and services. The planning shall cover different functions of forests including production of merchantable wood and non-wood products, conservation and protection, as well as recreational services. The SFI standard requires that SFI Program participants develop internal targets and procedures on seedling improvement among others.

The practical measures for enhancement of forest resources focus on soil protection, prompt regeneration and pest/damage prevention. Less attention is given to stand management during the rotation.

Adequate road network with appropriate bridges, culverts, etc. is defined in mandatory Best Management Practices for water protection. Compliance with Best Management Practices including the quantity and the quality of this infrastructure is assessed in annual audits.

The SFI conforms to PEFC requirements on forest production as defined in PEFC ST 1003:2010.

For a detailed analysis see Appendix 1 p. 62–70.

6.2.4 Criterion 4 – Enhancement of Biological Diversity

Forest Structure

Standard requires appropriate consideration of biodiversity values, biologically important areas in forest management planning. Legislation defines the requirements especially in public forestry, but for private forestry they are less strict. SFI's approach to enhancement of a diverse forest structure is based on protection of valuable sites and areas at stand and landscape levels. In addition, the standard sets a general requirement on maintenance of diversity at landscape levels. The standard urges for protection of diversity at a landscape level whenever possible.

In this context it is relevant to note that the scale of forest management operations is fairly large in the US and Canada. Individual harvesting sites may, by law, be up to 250 hectares in size. The maximum clear felling area varies between jurisdictions and forest types. The SFI standard restricts the maximum size of clear felling to 50 hectares. In the large scale forestry, the measures for forest cover connectivity at landscape level are important. The standard requires planning of clear-cut areas in a way that ensures high visual quality and a green tree cover at a landscape level.

The standard prohibits conversion of one forest type to another and especially the conversion of important sites (e.g. valuable ecosystems) to other forest types. It also requires a program to protect valuable ecological community types. In addition, the indigenous people shall have the right to conserve traditional ways of using forests.

Restoration of wildlife increases browsing pressure on some areas. Forest managers, however, do not have the mandate to make decisions related to control of wildlife populations. Measures to adapt forest management and to protect seedlings from browsing are taken when feasible.

At a FMU (Forest Management Unit) level, the standard requires leaving of retention trees, decaying trees and promotion of mixed stand structure wherever appropriate (e.g. in naturally regenerated forests and broadleaved forests).

Provisions for water protection require establishment of buffer zones that are defined in detail in the mandatory Best Management Practices for water protection approved by authorities.



Species Protection

Legislation in Canada and the US protects threatened and endangered species. The standard requires identification and protection of these species and legislation prohibits their exploitation for commercial purposes.

Forest Stand

The standard requires prompt regeneration with domestic species which contribute to diverse stand structure and soil protection. Conditions for natural regeneration shall be preserved when possible. Exotic species may be used only in exceptional cases.

The standard requires deployment of improved planting stock in artificial regeneration. For public forests there are state/provincial level legal requirements regarding seed provenance and restriction of the deployment of exotic species. In private forests a forest owner makes the decision within the limits provided by legislation and the SFI standard.

SFI is committed to comply with legislation and PEFC policy on the use of genetically modified organisms (GMO). SFI follows the policy on Forest Tree Biotechnology (Section 7 in SFI 2015–2019 Standards and Regulations) that currently prohibits commercial use of GMOs. Certified organizations may be involved in research when it adheres to all applicable laws and regulations.

The SFI conforms to PEFC requirements on biodiversity enhancement as defined in PEFC ST 1003:2010.

For a detailed analysis see Appendix 1 p. 70–81.

6.2.5 Criterion 5 – Enhancement of Protective Functions in Forest Management

The SFI forest management planning requires consideration of land classification, i.e. identification of land areas with water or soil protection functions. SFI participants shall implement water, wetland and riparian protection measures that are based on physical and ecological types and functions of the area. Also, the SFI provisions regarding protection of forests from damaging agents assume appropriate measures for soil and water protection including plans that address exceptional wet-weather events.

The standard requires compliance with the mandatory Best Management Practices developed at state/province and/or municipal levels. The BMPs set operational level rules for water and soil protection. The annual surveillance audits also assess the compliance with the BMPs.

The BMPs and the SFI standard set restrictions on use of chemicals and road construction among others. Buffer zones are defined in the BMPs of certificate holder's programs and plans on water protection and prevention of damages.

The SFI conforms to PEFC requirements on protective functions of forests as defined in PEFC ST 1003:2010.

For a detailed analysis see Appendix 1 p. 81–86.



6.2.6 Criterion 6 – Maintenance of Socio-economic Functions

Socio-economic Values and Wellbeing

The SFI Program requires high level of outreach from certificate holders to local communities. The organizations shall participate in regional/local SFI regional Standard Implementation Committees (SIC) that increase awareness in sustainable management and organize training for contractors and loggers. The SIC is also the first level, along with certification bodies, to address complaints related to the management of certified forests.

In enhancement of socio-economic values and wellbeing in certified forestry, the SFI standard focuses on generation of employment opportunities, competence building and information dissemination and protection of valuable ecological and heritage sites. It also requires efforts for improvement of communication with affected parties including aboriginal communities.

Property rights are well defined in the US and Canada. Legislation and enforcement measures protect the rights as appropriate. This also applies to the rights of aboriginal communities.

The standard obliges to provide recreational opportunities on private and public lands. SFI follows up the share of certified forests accessible fully or partly for recreation and in 2015 97% of the forests were used for different outdoor activities. Protection of aesthetic values is also emphasized in the standard. The required greening plan restricts the area of consecutive clear felling areas before the newly regenerating stand reaches a defined size. In special areas, e.g. along shorelines, regulations set stricter aesthetic requirements.

International Labour Conventions

The SFI standard addresses requirement set in ILO Conventions 87, 98, 111⁴ that are not ratified by the US (Table 6.1). The requirements of the other Conventions (ILO C 29 Forced Labour Convention (1930), 100 Equal Remuneration (1951), 105, Abolition of Forced Labor (1957), 138 Minimum Age for Admission to Employment (1973), 182 Worst Forms of Child Labor Convention (1999) shall be addressed by the legislation or the SFI standard.

PEFC also refers to ILO Convention on Occupational Safety and Health Convention (1981) that are covered by legislation to a variable degree (see Appendix 1 p. 100–101).

In 2005 an independent US lawyer conducted an analysis on the consideration of the core elements of the following ILO Conventions in the US legislation for the SFI:

- 29 and 105 on forced Labor
- 87 and 98 on right to organize
- 100 on equal remuneration
- 111 on discrimination
- 138 on minimum age of employment.

The lawyer's conclusion was that the US federal level legislation prohibits forced and child labor, guarantees freedom of association, a right to organize collective bargaining (with some limitations) and also equal remuneration. However, Alabama, North Carolina and Virginia have legislation that prohibit collective bargaining in public sector and thus, in practice, prohibits the full compliance with ILO C 98.

In Canada the ratification status is higher as presented in the Table 6.1.

⁴ ILO 87 – Freedom of Association and Protection of Right to Organize

ILO 98 – Right to Organize and Collective Bargaining

ILO 111 - Discrimination (Employment and Occupation)



Fundamental ILO Conventions Number	Name and Year	Status in USA	Status in Canada
Freedom of Association and the Effective Recognition of the Right to Collective Bargaining			
ILO No 98	Right to Organize and Collective Bargaining, 1949	not ratified	not ratified
ILO No 87	Freedom of Association and Protection of the Right to Organize, 1948	not ratified	23 Mar 1972
Elimination of all Forms of Forced and Compulsory Labor			
ILO No 29	Forced Labor, 1930	not ratified	13 Jun 2011
ILO No 105	Abolition of Forced Labor, 1957	25 Sep 1991	14 Jul 1959
Effective Abolition of Child Labor			
ILO No 138	Minimum Age for Admission to Employment, 1973	not ratified	not ratified
ILO No 182	Worst Forms of Child Labor Convention, 1999	2 Dec 1999	06 Jun 2000
Elimination of Discrimination in Respect of Employment and Occupation			
ILO No 100	Equal Remuneration, 1951	not ratified	16 Nov 1972
ILO No 111	Discrimination (Employment and Occupation) 1958	not ratified	26 Nov 1964
Other ILO Conventions referred by PEFC Council			
ILO No 155	Occupational Safety and Health Convention, 1981	not ratified	not ratified
ILO No 169	Indigenous and Tribal People's Convention, 1989	not ratified	not ratified

Table 6.1 Ratification Status of Fundamental ILO Conventions in North America

Sources: <u>http://www.ilo.org/dyn/normlex/en/f?p=1000:11200:0::NO:11200:P11200_COUNTRY_ID:102582</u> http://www.ilo.org/dyn/normlex/en/f?p=1000:11200:0::NO:11200:P11200_COUNTRY_ID:102871

The SFI standard assumes that legal compliance ensures appropriate application of the ratified ILO Conventions and forestry enterprises shall take measures that encompass the intent of the unratified ILO conventions. SFI 2015–2019 Standards and Rules, Section 6 – Guidance to SFI 2015–2019 Standards and Rules, Chapter 13 ILO Core Conventions, specifies the consideration of ILO Conventions.

Compliance with ILO Conventions is a complex issue that easily leads to juridical interpretations in cases of complaints on infringement. SFI has a special ILO Task Force that addresses complaints related to inconsistent practices with ILO Conventions 87, 98 and 111. These shall be first addressed to a Program participant and a certification body. If the given response is unsatisfactory, the complainant shall contact the SFI ILO Task Force. The SFI ILO Task Force will inform the SFI Board on the issue raised.

SFI ILO Task Force or the SFI Board of Directors do not address labor law related issues that are addressed through formal grievance processes or by any agencies established by the US National Labor Relations Act, provincial Labor Code or Act or the courts.

In the US the ratified Conventions (105, 182) together with the C 87, 98 and 111 address all the four key areas of fundamental ILO Conventions, i.e. freedom of association and bargaining, forced labor, abolition of child labor and elimination of discrimination.

In addition, an independent legal review concluded that the US legislation is compatible with the ILO Conventions 87, 98, 29, 105, 138, 100 and 111.



The SFI standard requirements are considered to conform to the PEFC requirements on ILO Labour Conventions based on the lawyer review on the consideration of the Conventions in the US labor legislation and on the SFI supplementary requirements to address the unratified Conventions.

International Conventions on Human Rights

Canada and the US have ratified the UN Declaration on the Rights of Indigenous People (UNDRIP 2007) that, however, is not legally binding or subject to supervisory or regular monitoring applied to ILO Conventions. ILO 169 Convention on Indigenous and Tribal People's Convention (1989) that would be legally binding and subject to annual monitoring is not ratified. On the other hand, the scope of the Declaration is broad and has relevance to ILO instruments beyond to the Convention 169 (see Appendix 1 p. 89 for details).

The US and Canada have well-developed legislation to protect the rights of indigenous people. By law public forestry at a state/provincial level is mostly responsible on ensuring that the interests of indigenous communities are fully taken into consideration in forest management. The principle of Free Prior Informed Consent (FPIC) is respected as appropriate through legislation.

Based on legal compliance, the SFI standard conforms to PEFC requirements on the rights of aboriginal people.

Safety

The Federal laws of the US Occupational Safety and Health Administration (OSHA) and the Canadian Center for Occupational Health and Safety stipulate the detailed requirements for work safety and health. The US State and Canadian Provincial legislation set more specific requirements e.g. on safety and monitoring.

SFI training requirements oblige development and organization of courses on work safety where provincial, state and local employment laws set the performance requirements. In areas/organizations with loggers' certification programs, the performance requirements may go beyond regulative standards (see Appendix 1 p. 98–99).

Based on legal compliance and SFI strong promotion of training, the SFI standard conforms to PEFC requirements on work safety.

Complaint Procedures

SFI has established complaint procedures at regional/local levels. The procedures are accessible to any party. Any party is entitled to inform on non-conforming practices first to the certificate holder that shall respond within 45 days in addition to sending also a copy of the response to the certification body.

If the complainant believes that the issue has not been satisfactorily resolved, he may provide its original documentation and the response from the program participant to the appropriate SFI SIC that holds an Inconsistent Practices Program and it will address the issue together with the certification body (see Appendix 1 p. 96).

The SFI complaint procedures conform to PEFC requirements



Support to Research

Requirements to contribute to research and to integrate scientific information to improvement of forest management are compliant with PEFC requirements (see Appendix 1 p. 102).

6.2.7 Criterion 7 – Legal Compliance

The baseline in SFI certification is compliance with applicable federal, state/provincial and local laws and regulations. A certificate holder shall have a written commitment to comply with the relevant legislation and take necessary measures to demonstrate the compliance. Legal compliance also includes respect of the right of workers and labor representatives in a manner that encompasses the intent of the core ILO Conventions.

Regarding the PEFC requirement to protect forests from unauthorized activities, the SFI standard first requires legal compliance from the certificate holder and the SFI Policy on Illegal Logging demands consistency in legal compliance in certified and non-certified forests managed by the participant (see Appendix 1 p. 105).

The SFI requirements on legal compliance conform with PEFC requirements.



7. CHAIN OF CUSTODY CERTIFICATION

The SFI has a scheme specific chain of custody standard that is valid for the issuance of SFI label licenses. The standard is not part of this conformity assessment.

For PEFC labelling, SFI requires, as appropriate, a chain of custody certificate that is issued against the PEFC International chain of custody standard (PEFC ST 2003:2012).

SFI 2015–2019 Standards and Rules do not address PEFC chain of custody certification. The requirement is communicated as a condition for PEFC labelling and is specified in PEFC Logo Usage Contracts. These documents are confidential.

Confidential SFI Notification Contracts with certification bodies are the only sources of information on applied requirements for certification bodies doing chain of custody certification. The studied contracts require that certification bodies and procedures comply with PEFC ST 2002:2013.

In PEFC chain of custody certification the accreditation shall be issued from the American National Standards Institute (ANSI) in the US or SCC in Canada. These two bodies issue accreditations based on ISO 17065 standard on requirements for bodies certifying products, processes, and services.

The SFI website provides information on PEFC Labelling and requests applicants to contact the SFI Office of Label Use and Licensing that also maintains a record on issued PEFC chain of custody certificates.

The review of SFI procedures in PEFC chain of custody certification is not part of this assessment. For PEFC logo license SFI requires a PEFC chain of custody certificate as appropriate.

8. PEFC LOGO USAGE

Issuance of Logo Use Licenses

SFI Inc. is the PEFC Governing body in the US and is committed through a contract with PEFC Council to comply with the PEFC rules on Administration of the PEFC Scheme (PEFC GD 1004:2009). This document obliges to conform to PEFC logo licensing rules (PEFC ST 2001:2008). SFI Inc. signs PEFC Logo Usage Contracts with logo users that comply with the terms of the contract. The applicant shall conform to PEFC ST 2001:2008 that is attached to the contract. The PEFC ST 2001:2008 standard requires that a logo license holder has a valid accredited forest management and/or chain of custody certificate that is issued against the PEFC international chain of custody standard (PEFC ST 2002:2013).

SFI Standards and Rules or other Program documents do not describe or make reference to the PEFC logo licensing or rules. SFI advises applicants to contact the SFI Office of Label Use & Licensing and to consult the SFI website. The compliance to the PEFC rules is set through i) contracts between SFI Inc. and PEFC Council on Administration of the PEFC Scheme and ii) contracts between SFI Inc. and a logo license holder on the PEFC Logo.

SFI is PEFC logo licensing body for applicants that have SFI forest management and/or PEFC chain of custody certificate in the US. In Canada the applicant shall have both SFI forest management and PEFC chain of custody certificates to be entitled to use the logo based on SFI certification. In Canada, PEFC Canada is the national governing body and also governs the logo licensing in the country. It may issue logo licenses if applicant has only a PEFC chain of custody certificate.

The SFI Office of Label Use and Licensing administers the label use. Through the SFI Inc. contract with the PEFC Council it is committed to comply with PEFC GD 1004:2009 that states: *"licensing body shall have mechanisms for the investigation and enforcement of the compliance*"



with PEFC Logo usage rules (PEFC ST 2001:2008)." The requirement is enforced through the PEFC Logo Usage Contract Article 7 stating: "The logo user, in case of user group B or C, shall undertake to provide, immediately after each chain of custody (C-o-C) or forest management certification audit, the SFI with a notification, verified by the certification body, of the on-product use of the PEFC logo...and that the logo user shall supply the SFI with a detailed, free form account of any off-product use of the PEFC logo." Thus, both the certification body and the SFI control the logo use. SFI maintains a database on SFM and chain of custody certificate and PEFC and SFI logo license holders.

The PEFC logo licensing process and the procedures as defined in the contractual documents conform to the PEFC requirements. However, the SFI should take the following comment into consideration in the improvement of SFI documentation:

 SFI should describe and make publicly available the documents regarding procedures and conditions on logo licensing and logo use. Currently companies are encouraged to contact the SFI's Office of Label Use and Licensing on the issue (ref. Appendix 1 PEFC Checklist Part IV 15, p. 116 and Part VI 2, p. 123).

In Canada, applicants for a PEFC logo license that do not have a SFI forest management certificate, submit their application to the PEFC Canada and not to SFI Inc. This process is not part of this assessment.



9. CERTIFICATION AND ACCREDITATION PROCEDURES

9.1 SFI Requirements for Certification and Accreditation

SFI 2015–2019 Audit Procedures & Auditor Qualifications and Accreditation (Section 9 of the SFI Standards and Rules) outline the SFI requirements for certification bodies and auditors and for a certification process. The Program requires compliance to ISO 17021 standard for certification bodies accredited to provide forest management certification in line with the SFI 2015–2019 Forest Management Standard. The standard sets provisions for management system certification.

For accreditation of bodies doing chain of custody certification, the SFI assumes compliance with the ISO 17065 standard, that is applicable to certification bodies providing certifications of products, processes or services.

Accreditation bodies shall be national accreditation bodies from the US and Canada and members of the International Accreditation Forum (IAF). The recognized accreditation bodies are the ANSI-ASQ National Accreditation Board (ANAB) and the American National Standards Institute (ANSI) in the US and the Standards Council of Canada (SCC). They all are IAF members and signatories to its Multi-Lateral Agreement (MLA).

Certification and accreditation procedures in the SFI Program conform to the PEFC requirements with a comment:

4. SFI 2015–2019 Standards and Rules require that auditors and audit procedures in forest management certification comply with the ISO 17021 standard on Requirements for bodies providing audit and certification of management systems, but SFI does not make reference to ISO 19011 guidelines as required by Appendix 1 on PEFC Checklist (Part IV 8 and 13, p. 113, 115).

The assessor concluded that the SFI requirements for auditors and audit procedures are compliant, because ISO 17021 sets ISO 19011 compatible requirements for certification bodies, auditors and audit procedures. It is the reference standard used by accreditation bodies, whereas ISO 19011 is a guideline intended to help certification bodies to develop their procedures.

9.2 Notification of Certification Bodies

The SFI Program does not describe the procedures for the notification of certification bodies in public documentation. However, it publishes a list of certification bodies that are eligible to do SFI forest management certification. SFI Inc. also makes notification contracts with certification bodies doing SFI forest management and/or PEFC chain of custody certification. The confidential contracts include notification requirements that conform to the PEFC requirements.

Notification procedures conform to PEFC requirements with a comment:

 SFI 2015–2019 Standards and Rules do not explicitly require notification of certification bodies. However, SFI Inc. makes notification contracts with certification bodies doing chain of custody certification in compliance with the international PEFC chain of custody standard (PEFC ST 2002:2013) or the SFI 2015–2019 SFM standard. The contracts are made for one year at a time.

The SFI Program has notification procedures that conform to the PEFC requirements, but the Program should make the procedures in publicly available in documentation. The notification contract defines the conditions that are non-discriminatory (ref. Appendix 1 PEFC Checklist Part IV 26–27, 1 p. 120–121).



10. COMPLAINTS AND DISPUTE PROCEDURES

In standard setting the External Review Panel addresses any complaints raised (see Appendix 1 p. 14, 30–31).

In standard implementation and interpretation, the SFI Public Inquiries and Official Complaints procedures apply (SFI 2015–2019 Section 11). The procedures are well-defined and published and address complaints related to non-conforming activities identified by any party.

Complaints related to standard implementation are first discussed with a program participant and a certification body, if a satisfactory resolution cannot be made the issue is communicated to local SFI Implementation Committees. If it cannot be resolved at lower level decision making it will be ultimately taken to the Board (see Appendix 1 p. 96).

Complaints related to the certification process are dealt according to grievance procedures of the accredited certification body in question.

The complaints and dispute resolution procedures conform to PEFC requirements.



11. STAKEHOLDER SURVEYS

International PEFC Consultation

The international public consultation organized by the PEFC Council was held from November 2015 to January 2016. No comments were received during the consultation.

11.2 Stakeholder Questionnaire

Indufor sent out a questionnaire on standard setting process to 51 parties that included parties, which had participated in the standard development. The questionnaire was sent by email and SFI Inc. provided contact details. The questionnaire was sent out on February 18th, 2016 and respondents had 9 days to reply to the questionnaire. Replies received after the deadline were also accepted. 12 replies have been received: 6 from forest industry representatives, 3 from environmental NGOs, 2 from forest owners/managers and 1 from an industry association/lobby organization. The summary of received comments is presented in Table 11.1.

Replying interest groups	Commented issues
Forest and timber industry	Replying parties were well informed on the standard development, its procedures in a timely manner before and throughout the process.
ENGO	The perception was that all interested parties had a possibility for meaningful participation.
Forest owner/manager	No concerns or disputes were raised for their information; disagreeing views were discussed in the WG. The standards were decided on based on a consensus.
	Further improvement in standard to be done in the following revision.

 Table 11.1
 Summary of Comments of Stakeholder Consultation

The results of the national consultation support the conclusion that the standard setting process was well-planned and participatory. However, only one out of the 11 respondents was aware of dispute settlement procedures in case of conflicting views in standard development.



Appendix 1

Indufor Assessment on the SFI Conformity with PEFC Checklist (PEFC IGD 1007-01:2012)

Indufor Assessment of the Revised Sustainable Forestry Initiative (SFI) Programme Against the PEFC Council Requirements

PEFC Standard and System Requirement Checklist for the PEFC Council Re-endorsement in 2016

Appendix 1 to the Final Draft Report

TABLE OF CONTENTS

Part I:	Standard and System Requirement Checklist for Standard Setting (PEFC ST 1001:2010).	3
PART III:	Standard and System Requirement Checklist for SUSTAINABLE FOREST MANAGEMENT (PEFC ST 1003:2010)	37
PART IV:	Standard and System Requirement Checklist for certification and accreditation procedures (Annex 6)	108
Part V:	Standard and System Requirement Checklist for system specific Chain of custody standards	123
Part VI:	Standard and System Requirement Checklist for scheme administration requirements	123

Purpose:

- The assessment presented in this Appendix 1 reviews the compliance of the SFI Program with all PEFC Council requirements for endorsed forest certification schemes.

Explanations:

- The conclusion on conformity with the PEFC requirements is presented in the column YES/NO. YES is indication for a full conformity and NO indicates that the evidence provided by the applicant is not adequate to make a conclusion on a full conformity.
- Justification for the conclusion on conformity is provided under the column "Comment" in a form of an extract from a scheme document (*in italic*) and/or in an assessor's explanation.

Part I: Standard and System Requirement Checklist for Standard Setting (PEFC ST 1001:2010)

2 Checklist Referred SFI documents

	SFI 2015–2019 Standards and Rules - Appendix 1 of the PEFC Endorsement Application:
	Section 8 - SFI Standard Development and Interpretations Process
	http://www.sfiprogram.org/files/pdf/2015-2019-standardsandrules-section-8-pdf/
SFI Standard revision procedures	
	SFI Records Retention Policy - Appendix 2 of the PEFC Endorsement Application
	Standard Revision Task Group Rosters May 7, 2014 - Appendix 4 of the PEFC Endorsement Application -
SFI Statutes	SFI By-Laws
Of T Olaldles	http://www.sfiprogram.org/files/pdf/sfi-inc-bylaws-june-2013/
	SFI 2015–2019 Standard Review Process - Appendix 3 of the PEFC Endorsement Application –
	SFI 2015–2019 Standard Revision Process.
	http://www.sfiprogram.org/sfi-standard-2010-2014/introduction-to-the-standard/standard-review-process/
	Lists the Standard Revision Task Groups - Appendix 4 of the PEFC Endorsement Application
SFI Standard revision process	2913 Stakeholder Mapping Exercise - Appendix 5 of the PEFC Endorsement Application details
	Call Volunteers SFI 2015–2019 Standards Revision – Appendix 6 of the PEFC Endorsement Application
	SFI 2015–2019 SFI Standards Revision Task Group Expectations - Appendix 7 of the PEFC Endorsement Application
	SFI Press Release on reaching out to 10,000 stakeholders for standard revision - Appendix 8 of the PEFC Endorsement Application -
	http://www.sfiprogram.org/media-resources/news/sfi-reaches-out-to-10000-stakeholders-to-revise-its-forestry-standard/

	 SFI Seeks Input for Standard Revision January 7, 2014 - Appendix 9 of the PEFC Endorsement Application. Jan 2014 Press Release <u>http://www.sfiprogram.org/media-resources/news/sfi-reaches-out-to-thousands-to-improve-forestry-standard/</u> The processes by which stakeholders were invited to nominate representative(s) to the Standard Revision Task Groups working group/committee are detailed in Appendices 1, 5, 6, 7, 8, 9, 10 and 11 of the PEFC Endorsement Application.
	SFI Board meeting memos in Appendices 19 and 20 of the PEFC Endorsement Application
Dispute settlement procedures	SFI 2015–2019 Standards and Rules - Appendix 1 of the PEFC Endorsement Application Section 8 - SFI Standard Development and Interpretations Process (standard development) http://www.sfiprogram.org/files/pdf/2015-2019-standardsandrules-section-8-pdf/ Section 11 - Public Inquiries and Official Complaints (standard implementation)
Group certification	Not covered by this assessment
Chain of custody certification	Certification to PEFC International Chain of Custody standard PEFC ST 2003:2012 is required for PEFC labelling
Logo usage rules	PEFC Logo Use Rules PEFC ST 2001:2008 SFI Inc. is obliged to confirm with PEFC GD 1004:2009 on Administration of PEFC Scheme through the contract with PEFC Council. The requirements are implemented through subsequent contracts with logo license holders. Examples of contracts provided by the SFI Staff were reviewed for the required evidence.

	Question	Assess basis*	YES /NO*	Reference to application documents and comments		
	Standardizing Body					
4	1 The standardizing body shall have written procedures for standard-setting activities describing:					

[©] Indufor Assessment of the Revised Sustainable Forestry Initiative (SFI) Programme Against PEFC Council Requirements – PEFC Council Checklist PEFC IGD 1007-01:2012., Final draft report, June 20, 2016. 4

Question	Assess basis*	YES /NO*	Reference to application documents and comments
a) its status and structure, including a body responsible for consensus building (see 4.4) and for formal adoption of the standard (see 5.11),	Procedures	YES	 Appendix 1, Section 8 – SFI standards development and interpretations process 1. Procedures for SFI standard revision 1.1 Actors and responsibilities clearly states that the SFI Board of Directors is the body responsible for standard-setting activities: "The SFI Board of Directors is responsible for standard development and revision and will convene the Forum". 1.1.1 SFI Board defines the structure of the board: "SFI Board members include representatives of environmental, conservation, social professional and academic groups, independent professional loggers, small family forest owners, public officials, labor and the forest products industry. The 18-member SFI Board of Directors has representatives from the main geographic regions of the U.S. and Canada and includes". 1. 2 Procedures Formal adoption of the standard is done by the SFI board: "Upon completion of the SFI Board 45-day advance review period, the SFI Standards shall be finalized by the Forum and approved by the SFI Board" and it is its task to carry out the standard-setting activities in a consensus-based manner: "The SFI Standards development process is open, transparent and consensus based, and SFI Inc. Board decisions regarding final changes to the SFI Standards shall be consistent with PEFC ST 1001:2010 for consensus-based decision making". Forest Management Task Group (15 persons) – drafts the standard proposal and addresses comments issued Steering committee nominated by the Board – reviews the draft SFI Board – amends (if needed) and approves the standard External Review Panel – reviews standard setting process and consideration of comments. Conclusion - conforms The SFI Board is responsible for standard development and consensus-building.
b) the record-keeping procedures,	Procedures	YES	Appendix 2, SFI Inc. Policies and Procedures Sustainable Forestry Initiative Inc. Records Retention Policy VI SFI STANDARDS AND GUIDELINES DOCUMENTS states that all the main documents related to the standards and guidelines are to be kept within a certain period of time: "All final documents used in research and development of standards, specifications, or guidelines (including revisions and reaffirmations) shall be retained for a minimum of one standards development cycle. Records for standards that are withdrawn shall be kept for a minimum of five years from the date of withdrawal. These include background information, ballots, meeting books of standards committees, letters of interpretations, and documentation of standards provisions".

Question	Assess basis*	YES /NO*	Reference to application documents and comments
			Appendix 1, Section 8 – SFI standards development and interpretations process 1. Procedures for SFI standard revision 1. 2 Procedures determines the responsibility of a Forum in record-keeping: "The Forum shall maintain records regarding all comments and their disposition for review by the independent External Review Panel. All comments will be considered carefully and records of their disposition maintained for a minimum of five years and posted to the SFI website".
			Appendix 1, Section 8 – SFI standards development and interpretations process 1. Procedures for SFI standard revision 3. Interpretations indicates that the SFI is obliged to <u>keep records of</u> <u>concerns</u> related to standards and supporting documents: " <i>The SFI program shall maintain a record</i> of opinions and concerns available to both Program Participants and certification bodies to assist with certification planning".
			Conclusion - conforms Appropriate record keeping procedures by the SFI.
c) the procedures for balanced representation of stakeholders,	Procedures	YES	Appendix 1, Section 8 – SFI standards development and interpretations process 1. Procedures for SFI standard revision 1. 2 Procedures determines that stakeholder mapping shall be aimed at inviting various interested parties for participation in a standard-setting process: "A stakeholder mapping exercise will be used to identify which interest sectors — both public and private — are relevant (environmental, economic, social)". It is especially emphasized that a broad stakeholder may be considered as potential stakeholders for a standard revision process: "Disadvantaged and key stakeholders and those from the environmental community, forest products industry, private forest landowners, customers, local and federal government agencies, trade associations, landowner associations, academia and all other stakeholders".
			The External Review Panel shall independently monitor the entire process including a review of all comments received on draft standards and their disposition.
			Conclusion - conforms
			Procedures to identify relevant stakeholders are in place. Stakeholder participation takes place at several levels: e.g. in Task Force, SFI Board, public consultation, workshops and External Review Panel
d) the standard-setting process,	Procedures	YES	See PEFC Checklist question 4.1 f for description.
			Conclusion - conforms

Question	Assess basis*	YES /NO*	Reference to application documents and comments
e) the mechanism for reaching consensus, and	Procedures	YES	The mechanism for reaching consensus is described in Appendix 1, Section 8 – SFI standards development and interpretations process 1. Procedures for SFI standard revision 1. 2 Procedures: "The SFI Standards development process is open, transparent and consensus based, and SFI Inc. Board decisions regarding final changes to the SFI Standards shall be consistent with PEFC ST 1001:2010 for consensus based decision making". In footnotes, it is stated "consensus… is a process that involves seeking to take into account the views of all parties concerned and to reconcile any conflicting arguments". In addition, the next footnote specifies how a consensus-based approach for the final approval of SFI documents shall look like: "A minimum of eighty percent of those present, which must include at least two representatives of each Sector [environmental, social, economic] is required to approve any action of the Board". Conclusion – conforms Procedures define the mechanisms for a consensus-based decision
f) Revision of standards/normative documents.	Procedures	YES	 According to the SFI documentations standard revision shall take place every 5 years and its procedures are described in detail in the Appendix 1 Section 8 – SFI standards development and interpretations process 1. Procedures for SFI standard revision 1. 2 Procedures. In a nutshell it consists of various stages: Public notice to all stakeholders prior to the beginning of the process Public notice to all stakeholders on the beginning of the process Stakeholder identification and invitation First 60-day public comment period for suggested improvements Processing comments Draft review workshops Finalization of the first draft by the Review Task Group Review of the first draft by the Steering and Resource Committees and Board Second 60-day consultation period (conform to PEFC requirements on consultation) Regional review workshops Development of the final draft by the Task Group Provision of the final draft to SFI Board for 45-day advanced notice (commenting period) Preview of the final SFI Standards by the Board Preview of the final SFI Standards on the SFI Inc. website

Question	Assess basis*	YES /NO*	Reference to application documents and comments
			Conforms
4.2 The standardizing body shall make its standard-setting procedures publicly available and shall regularly review its standard-setting procedures including consideration of comments from stakeholders.	Procedures	YES	The availability of standard-setting procedures is ensured by the statements included into the Appendix 1 Section 8 – SFI standards development and interpretations process 1. Procedures for SFI standard revision 1. 2 Procedures: <u>"These written procedures shall be publicly available to</u> <u>all interested parties</u> ". Appendix 1 Section 8 – SFI standards development and interpretations process 1. Procedures for SFI standard revision 3. Interpretations contains a provision on a periodic review of SFI's standard-setting procedures: "Through this process, the SFI program shall maintain a record of opinions and concerns available to both Program Participants and certification bodies to assist with certification planning. SFI Inc. Shall periodically review this record and, where appropriate, recommend changes for inclusion in the SFI 2015–2019 Standards or SFI audit procedures." Conclusion - conforms <u>http://www.sfiprogram.org/files/pdf/sfirequirements2010-2014pdf/</u> Standard-setting procedures were available within the SFI 2010-2014 package of documents available from the SFI website.
4.3 The standardizing body shall keep records relating to the standard-setting process providing evidence of compliance with the requirements of this document and the standardizing body's own procedures. The records shall be kept for a minimum of five years and shall be available to interested parties	Procedures	YES	Conclusion - conforms Appendix 1 Section 8 – SFI standards development and interpretations process 1. Procedures for SFI standard revision 1. 2 Procedures: "The Forum shall maintain records regarding all comments and their disposition for review by the independent External Review Panel. All comments will be considered carefully and records of their disposition maintained for a minimum of five years and posted to the SFI website". A requirement for a minimum 5-year record keeping and availability of comments is met. Additional information on the SFI Standards Development process, regional workshop reports and stakeholder comments submitted during both public comment periods and how they were addressed shall be publicly available and also maintained for a minimum of five years. Conclusion - conforms Appendix 19 – SFI Board meeting minutes – November 5, 2014.
upon request.	Process	YES	Appendix 19 – SFI Board meeting minutes – November 5, 2014. Standard revision process <u>http://www.sfiprogram.org/sfi-standard-2010-2014/introduction-to-the-standard/standard-review-process/</u>

Question	Assess basis*	YES /NO*	Reference to application documents and comments	
			Press releases of June 2013 on first consultation to provide information on issues to consider in standard setting, January 2014 on second consultation and on January 2015 on the publication of the standard.	
			The Draft was published before the second public consultation in January 6 to March 7, 2014.	
			In addition, all comments and their consideration were publicly available, as well as workshop and webinar material. Conclusion - conforms	
			Conclusion	
			The process was transparent and relevant material was shared through Internet	
	Procedures	YES	 Appendix 1 Section 8 – SFI standards development and interpretations process 1. Procedures for SFI standard revision 1.1 Actors and responsibilities clearly states that the SFI Board of Directors is the body responsible for standard-setting activities: <i>"The SFI Board of Directors is responsible for standard development and revision and will convene the Forum</i>". 	
4.4 The standardizing body shall			Conclusion - conforms	
establish a permanent or temporary working group/committee responsible fo standard-setting activities.	Process	YES	Appendix 1 Section 8 – SFI standards development and interpretations process 2. Development of the SFI 2015–2019 standards and rules and Appendix 4 – Standard Revision Task group Rosters: According to SFI's description of the process 5 Forum Review Task Groups were formed in late summer 2013 to work on the development of forest management, fiber sourcing and chain of custody standards, namely Forest management, Fiber Sourcing, CoC and certified sourcing, small landowners and bioenergy and climate change task groups. Note that this assessment only addresses the development of The Forest Management Standard.	
			Conclusion - conforms	
4.4 The working group/committee shall:				
a) be accessible to materially and directly affected stakeholders,	Procedures	YES	Appendix 1 Section 8 – SFI standards development and interpretations process 1. Procedures for SFI standard revision 1. 2 Procedures implies that the working group is accessible by affected stakeholders: "SFI shall identify stakeholders relevant to the objectives and scope of the standard-setting work". Stakeholder mapping shall be done	
			Appendix 3 SFI 2015–2019 Standard Revision Process	

Question	Assess basis*	YES /NO*	Reference to application documents and comments
			http://www.sfiprogram.org/sfi-standard-2010-2014/introduction-to-the-standard/standard-review-process/ The standard revision is launched with public information and invitation to give inputs/comments to SFI on the standard revision. Invitation for preliminary commenting is sent to a broad range of stakeholders identified in stakeholder mapping /about 10 000 interest groups). The Task Force Group prepares the standard draft which is then submitted for public consultation.
	Process	YES	Conclusion - conforms Appendix 5 - Stakeholder mapping exercise includes references to materially and directly affected stakeholders. SFI sent invitations for participation to all of them (10 000 stakeholders representing different interest groups) for giving comments/inputs before the standard setting work started. The Task Force Group on Forest Management drafting the standards included 15 members representing different interest groups (See PEFC checklist question 4.4. b below). Invitation for participating in the Task Force Group was sent to Program participants (240 in total) and to other stakeholders (evidence in invitation, contacts was not made available). Note: PEFC requires that records on standard setting shall be stored for five years. Information on the revision process was communicated openly and the interest groups that expressed their willingness and had the resources and competence to participate had an access to the Task Force Group. The SFI Board has 18 members with a balanced representation of economic, social and environmental interest groups. Board members are nominated by a committee. With the term of working group the SFI refers to the SFI Board of Directors supported with the Steering group that is nominated by the Board. Conclusion – conforms The SFI has a multiple level process in standard drafting and decision making. In principle balanced representation is aimed at in all levels – public commenting, Task group, Resource and Steering committees and the Board that is the final decision-maker.

[©] Indufor Assessment of the Revised Sustainable Forestry Initiative (SFI) Programme Against PEFC Council Requirements – PEFC Council Checklist PEFC IGD 1007-01:2012., Final draft report, June 20, 2016. 10

Question	Assess basis*	YES /NO*	Reference to application documents and comments
			The Task Group has an important role in standard setting, because it drafts the proposals that will be subject to the Board approval. Therefore, a special focus is paid to the access and composition of different interest groups in the Task Group. The Task Group has a balanced composition of interest groups (see the following PEFC question). SFI has also asked comments from a wide range of stakeholders in different stages of the development process. The different drafting and decision making groups in the SFI Program include materially affected
b) have balanced representation and decision-making by stakeholder categories relevant to the subject matter and geographical scope of the standard where single concerned interests shall not dominate nor be dominated in the process, and	Procedures	YES	 stakeholders. Appendix 1 Section 8 – SFI standards development and interpretations process 1. Procedures for SFI standard revision 1. 2 Procedures implies that the working group is accessible by relevant stakeholders: "SFI shall identify stakeholders relevant to the objectives and scope of the standard-setting work". Appendix 1 Section 8 – SFI standards development and interpretations process 1. Procedures for SFI standard revision 1. 2 Procedures implies that all stakeholders relevant to the geographical scope of the standard are taken into account: "Broad public and stakeholder involvement is important to the SFI program. The SFI Standards review process shall be conducted on a national level in Canada and in the United States." SFI Board By-laws (June 11, 2013): Article III 1. "…shall be eighteen members of the Board of Directors …" 1. The Board… shall strive to represent a diversity of stakeholder groupsSix Directors shall be drawn from forest, paper, and wood products industry, for-profit ownership or management entities distributors, manufacturers, retailers or allied organizationswill comprise Economic sector Six Directors… from nonprofit environmental / conservation and or foundations or academic organizations with an environmental focuswill comprise Environmental sector. The remaining six Directors … from other stakeholder groups including academic, community and social interestswill comprise Social sector. Each organization is nominated for a three year period and may be re-elected for a second three year period.

Question	Assess basis*	YES /NO*	Reference to application documents and comments
			 3. Meetings The presence of sixty percent (60%) of the Directors in office with a minimum of two attending from each Sector shall constitute a quorum. 5. Voting. In order to ensure that no Sector of the Board of Directors can control the future of the Corporation, it shall take a minimum of sixty-six percent (66%) of those present to approve any action of the Board except where provided otherwise by law or by Article III.3.1 of these Bylaws. A Director may select an individual to represent him/her and to vote by proxy at one of the two meetings to be held each year. These individuals will be counted when determining a quorum. In addition to the above the SFI Resource Committee and the Forest Management Task Groups also aim at a balanced representation across the social, environmental and economic sectors. Likewise, the SFI External Review Panel has a balanced membership across i) environmental/conservation, ii) professional / academic and iii) public agencies (government). App 7 Task Group expectationsThe Standards Revision process is intended to be collaborative. While consensus on proposed Standards revisions is desirable there may be issues for which consensus cannot be achieved. In these scenarios the Task Group may forward multiple recommended options to the Steering Committee who will review and prepare for the Resources Committee's review. Conclusion – conforms The SFI Board (18 members) decides on the standard. The Task Group on Forest Management (15 members) drafts the standard proposal and is thus also a decision maker on its content. Public gives proposals for improvement (first consultation) and comments on the draft standard (second consultation). The External Review Panel monitors the standard revision procedures and consideration of comments. Geographic representation is taken into consideration in the SFI administration and Task Groups.
			Geographic representation is taken into consideration in the Sri administration and Task Groups.

[©] Indufor Assessment of the Revised Sustainable Forestry Initiative (SFI) Programme Against PEFC Council Requirements – PEFC Council Checklist PEFC IGD 1007-01:2012., Final draft report, June 20, 2016.

Question	Assess basis*	YES /NO*	Reference to application documents and comments
	Process	YES	Appendix 4 – Standard Revision Task group Rosters: the Forest Management task group included 15 experts and had a rather balanced representation of different stakeholders groups: Other 13 % Research 13 % Industry 34 % Industry's interests have a strong position in the standard drafting Task Force Group. Balanced Geographically; 60% of group members were US and 40% Canadian stakeholders. Conclusion - conforms
c) Include stakeholders with expertise relevant to the subject matter of the standard, those that are materially affected by the standard, and those that can influence the implementation of the standard. The materially affected stakeholders shall represent a meaningful segment of the participants.	Procedures	YES	 Appendix 1 Section 8 – SFI standards development and interpretations process 1. Procedures for SFI standard revision 1. 2 Procedures states some examples of stakeholder groups which shall be invited for standard setting/revision "Disadvantaged and key stakeholders and those from the environmental community, forest products industry, private forest landowners, customers, local and federal government agencies, trade associations, landowner associations, academia and all other stakeholders". "key stakeholders" and "stakeholders relevant to the objectives and scope of the standard-setting work". See also composition of Task group on forest management above. Invitation to participate in the Task group was sent on June 11, 2013 to all Program participants (appr. 240 organisations). 15 participants were identified based on their willingness, resources (time) and general awareness of forestry and the SFI standard structure. They are relevant to subject matter and materially affected.

Question	Assess basis*	YES /NO*	Reference to application documents and comments
			Conclusion – conforms
	Process	YES	Appendix 4 – Standard Revision Task group Rosters the Forest Management Task Group included 15 stakeholders with high level of expertise relevant to the subject matter of the standard, as well as those who could influence the implementation of the standard. Materially affected stakeholders (industry, indigenous people, some NGOs) represent a large segment of participants.
4.5 The standardizing body shall establish procedures for dealing with any substantive and procedural complaints relating to the standardizing activities, which are accessible to stakeholders.	Procedures	YES	 Appendix 1 Section 8 – SFI standards development and interpretations process 1. Procedures for SFI standard revision 1. 2 Procedures determines a general procedure for dealing with complaints: <i>"Formal complaints regarding the disposition of comments shall be <u>submitted in writing to the External</u> <u>Review Panel Secretariat¹ (http://sfierp.org/resources</u>) for review. The ERP shall acknowledge receipt of all complaints, impartially and objectively review all complaints, and provide feedback to the Forum regarding complaints where additional review and potential action by the Forum is warranted. Once resolved, the decision on the complaint and the complaint process shall be communicated to the complainant."</i> ERP reviews all complaints, if deemed valid, it informs SFI that formulates a response that will be reviewed also by the standard revision Steering Committee and the SFI Resource Committee. ERP is responsible for reviewing that the standard revision process is carried out according to the SFI rules – thus, any complaints related to standard revision will be taken into consideration. Complaint procedures on standard setting do not include hearing as a standard procedure.
	Process	n.a.	No disputes were recorded
	1	1	

¹ The volunteer External Review Panel (ERP) is made up of 15-18 external experts and has representatives from the main geographic regions of the U.S. and Canada where the SFI Standards are applied. Its membership maintains a balance of technical skills and organizational experience, with four to six members from each of the following categories – environmental/conservation groups, professional/academic groups, and public agencies (local, state, provincial, tribal or federal governments).

[©] Indufor Assessment of the Revised Sustainable Forestry Initiative (SFI) Programme Against PEFC Council Requirements – PEFC Council Checklist PEFC IGD 1007-01:2012., Final draft report, June 20, 2016. 14

Question	Assess basis*	YES /NO*	Reference to application documents and comments
4.5 Upon receipt of the complaint, the star	ndard-setting boo	dy shall:	
a) acknowledge receipt of the complaint to the complainant	Procedures	YES	Appendix 1 Section 8 – SFI standards development and interpretations process 1. Procedures for SFI standard revision 1. 2 Procedures requires that receipt of a complaint be acknowledged to the complainant: "The ERP shall acknowledge receipt of all complaints". Conclusion - conforms
	Process	n.a.	According to the SFI, no complaints were received.
b) gather and verify all necessary information to validate the complaint, impartially and objectively evaluate the subject matter of the complaint, and make a decision upon the complaint	Procedures	YES	Appendix 2 Section 8 – SFI standards development and interpretations process 1. Procedures for SFI standard revision 1. 2 Procedures includes provisions of this requirement: <i>"The ERP shall</i> <i>… impartially and objectively review all complaints, and provide feedback to the Forum regarding</i> <i>complaints where additional review and potential action by the Forum is warranted. Once resolved…</i> " Conclusion - conforms The External Review Panel will validate the complaint and justify it further to standard drafting Task Group and Committees.
	Process	n.a.	According to the SFI, no comments were received.
c) Formally communicate the decision on the complaint and of the complaint handling process to the complainant.	Procedures	YES	Appendix 1 Section 8 – SFI standards development and interpretations process 1. Procedures for SFI standard revision 1. 2 Procedures requires a formal communication of the decision regarding the complaint to the complainant: "Once resolved, the decision on the complaint and the complaint process shall be communicated to the complainant". ERP is responsible for the communication with the complainant. Conclusion - conforms.
	Process	n.a.	According to the SFI, no comments have been received.
4.6 The standardizing body shall establish at least one contact point for enquiries and complaints relating to its standard-setting activities. The contact point shall be made easily available.	Procedures	YES	Appendices 8-11 on information sharing and invitations for public inputs share contact information related to the SFI standard revision. The contact point is a SFI staff member. http://www.sfiprogram.org/sfi-standard-2010-2014/introduction-to-the-standard/standard-review-process/ Appendix 1 Section 8 – SFI standards development and interpretations process 1. Procedures for SFI standard revision 1. 2 Procedures specifies who complaints shall be addressed to:

Question	Assess basis*	YES /NO*	Reference to application documents and comments
			"Formal complaints regarding the disposition of comments shall be submitted in writing to the External Review Panel Secretariat (<u>http://sfierp.org/resources</u>) for review". ERP Secretariat and primary contact is Mr. Neil Sampson.
			Conclusion - conforms
			Standard-setting process
	Procedures	YES	Appendix 1 Section 8 – SFI standards development and interpretations process 1. Procedures for SFI standard revision 1. 2 Procedures directly sites the requirement: "SFI shall identify stakeholders relevant to the objectives and scope of the standard-setting work".
			Conclusion - conforms Stakeholder mapping is required.
5.1 The standardizing body shall identify stakeholders relevant to the objectives and scope of the standard-setting work.	Process	YES	According to SFI it has a database of various stakeholders consisting of 10 000 names including forest owners, forest managers, forest industry/processors, labor, traders/buyers, NGOs, government, forest science, indigenous/local communities, forest user, retailer, traders etc. who an invitation for participation/provision of inputs in the standard revision process has been sent to. Appendix 1 Section 8 – SFI standards development and interpretations process 2. Development of the SFI 2015–2019 Standard and rules Appendix 5 – 2013 stakeholder mapping exercise
			Conclusion Stakeholders were identified.
5.2 The standardizing body shall identify disadvantaged and key stakeholders. The standardizing body shall address the constraints of their participation and proactively seek their participation and	Procedures	YES	Appendix 1 Section 8 – SFI standards development and interpretations process 1. Procedures for SFI standard revision 1. 2 Procedures contains a requirement on identification of disadvantaged and key stakeholders: "Stakeholders —including disadvantaged and key stakeholders and those from shall be invited to participate in the review process". Constraints of participations are also addressed in the requirement that "stakeholder mapping exercise will be used to identify which interest are relevant including stakeholders who may not be able to participate by conventional means and what means of communications will best reach each stakeholder group".
contribution in the standard-setting activities.			Conclusion - conforms Appendix 5 – 2013 stakeholder mapping exercise presents various stakeholder groups, which also
	Process	YES	include disadvantaged and key stakeholders.

Question	Assess basis*	YES /NO*	Reference to application documents and comments
			SFI concluded that among the identified >9000 stakeholders, participation of French speaking stakeholders required special effort in providing material, workshops etc. in French language. Aboriginal groups and other stakeholders were able to participate through the standard procedures. The broad range of stakeholders contributed to standard development through two commenting rounds and in a number of workshops.
	Procedures	YES	Appendix 1 Section 8 – SFI standards development and interpretations process 1. Procedures for SFI standard revision 1. 2 Procedures contains a requirement on a public announcement on the beginning of the standard-setting on the website and newsletters (a suitable media): " The SFI Standards setting process shall begin with a public notice to all stakeholders prior to the start of the process. The start of the process will be communicated on the SFI website, in newsletters and e-mails to all stakeholders inviting comments". Conclusion - conforms
5.3 The standardizing body shall make a public announcement of the start of the standard-setting process and include an invitation for participation in a timely manner on its website and in suitable media as appropriate to afford stakeholders an opportunity for meaningful contributions.	Process	YES	Appendix 8 – SFI reaches out to 10 000 stakeholders to revise its forestry standard presents a press release which served as a public announcement of the start of the standard-revision process (June 5, 2013). This press release has been published on the SFI's website. Conclusion - conforms wwwfprogram.org/media-record/reve/TearetVtD-8545705F-A222-7% C C Servin G G Getting Started Name C C C Servin ARE 5, 2013 SFI Reaches out to 10,000 Stakeholders to Revise its Forestry Standard "WASHINGTON, D.C. and OTTAWA, ON - Today, the Sustainable Forestry Initiative Inc.® (SFI®) Iaunched the process of revising its current standard to develop the SFI 2015-2019 Standard, reaching out to more than 10,000 stakeholders to riput. Currently 240 million hectares) are third-party certified to the SFI 2010-2014 Standard on public and private lands. "The SFI Standard is developed through an open and inclusive process involving the many different people who know and care about our forests including public and private lands. "The SFI Standard is developed through an open and inclusive process involving the many different people who know and care about our forests including public and private lands. "The SFI Standard is developed through an open and inclusive process involving the many different people who know and care about our forests including public and private lands. "The SFI Standard is developed through an open and inclusive process involving the many different people who know and care about our forests including public and private lands. "The SFI Standard is developed through an open and inclusive process involving the many different people who know and care about our forests including public and private lands. "The SFI Standard on 240 million accres of forestiand." Name C C Million C C C C C C C C C C C C C C C C C C C

Procedures YES	This requirement is included into a footnote in Appendix 1 Section 8 – SFI standards development and interpretations process 1. Procedures for SFI standard revision 1. 2 Procedures stating, "the public announcement will includeobjectives, scope and steps of the standards setting process".
	Conclusion - conforms
a) information about the objectives, scope and the steps of the standard-setting process and its timetable, Process YES	Appendix 8 - SFI reaches out to 10 000 stakeholders to revise its forestry standard includes information about the objectives, scope and the steps of the standard-setting process and its timetable: The standard development process includes two 60-day public comment periods with the first beginning today and running from June 5 through August 6, 2013. During this period, respondents suggest improvements to the current 2010-2014 SFI Standard program requirements. The second public comment period begins in January 2014 to solicit comments on a working draft of proposed SFI 2015-2019 program requirements. The process includes 10 public Standards Development workshops across the U.S. and Canada and a facilitated webinar workshop to accommodate those stakeholders that cannot make any of the regional workshops. Same does the Appendix 6 Call Volunteers SFI 2015-2019 Standards Revision Using the SFI 2010-2014 standard revision process as a benchmark we estimate that the following levels of effort will be required of the respective task groups to produce the first working draft of the new SFI 2015-2019 program requirements: • SFI Forest Management Task Group - approximately 6-8 conference calls in the September - November 2013 time-frame • SFI Fore Sourcing Task Group - approximately 5-7 conference calls in the September - November 2013 time-frame • SFI CoC and Certified Sourcing - approximately 5-7 conference calls in the September - November 2013 time-frame • SFI CoC and Certified Sourcing - approximately 5-7 conference calls in the September - November 2013 time-frame • SFI CoC and Certified Sourcing - approximately 5-7 conference calls in the September - November 2013 time-frame

Question	Assess basis*	YES /NO*	Reference to application documents and comments
b) information about opportunities for	Procedures	YES	This requirement is included into a footnote in Appendix 1 Section 8 – SFI standards development and interpretations process 1. Procedures for SFI standard revision 1. 2 Procedures stating in footnote (5) that <i>"the public announcement will include information on how stakeholders can</i> <i>participate in the process, on how to submit comments on the standards".</i> Conclusion - conforms
	keholders to participate in the process, Process	YES	Appendix 6 Call Volunteers SFI 2015–2019 Standards Revision or the invitation contains information about opportunities for stakeholders to participate in the process. Conclusion - conforms Stakeholders have the opportunity to suggest improvement to the SFI 2010-2014 standard.
c) An invitation to stakeholders to nominate their representative(s) to the working group/committee. The invitation to disadvantaged and key stakeholders shall be made in a manner that ensures that the information reaches intended recipients and in a format that is understandable,	Procedures	YES	 Appendix 1 Section 8 – SFI standards development and interpretations process 1. Procedures for SFI standard revision 1. 2 Procedures: "the <u>public announcement</u> will include information on how to be involved in standards revision workshops and working groups". Appendix 1 Section 8 – SFI standards development and interpretations process 1. Procedures for SFI standard revision 1. 2 Procedures contains a requirement on identification and invitation of disadvantaged and key stakeholders: "Stakeholders —<u>including disadvantaged and key stakeholders</u> and those from shall be invited to participate in the review process". Reaching intended recipients and an understandable format of an invitation are implied in the statement that a <u>"stakeholder mapping exercise will be used to identify which interest are relevant including stakeholders who may not be able to participate by conventional means and what means of communications will best reach each stakeholder group".</u> Appendix 5 – 2013 stakeholder mapping exercise contains a footnotes stating that <u>"Mailing letters and newspaper announcements not an effective means of communication given the broad scope of the standard and number of stakeholders across both Canada and the United States. Additionally, with the high rate of computer availability and literacy, <u>emailing invitations to comment is the most effective means of reaching out</u>".</u> Public stakeholders were first invited to express views and development ideas to the old SFI standard and in second invitation to comment on the draft standard and other elements of SFI included planned standard revisions. The independent External Review Panel (ERP) consisting of nominated stakeholders reviewed the compliance of the standard revision.

Question	Assess basis*	YES /NO*	Reference to application documents and comments
			The Task Group On Standard Revision composed by program participants drafted the standard proposal and addressed all comments relevant to standard development.
			The SFI Board makes the final decision on the standard.
			Conclusion - conforms
			Appendix 6 Call Volunteers SFI 2015–2019 Standards Revision or the invitation included a call for volunteers to sit on specific Task groups. SFI considered the access of different stakeholders to participate in the process and concluded that
	Process	YES	availability of material and participation opportunities in French is essential for the participation of French-speaking stakeholders in Canada. Special effort was made to translate the material and host workshops in French. Other stakeholders had the resources and access to participate at the level of their interest.
			Conclusion - conforms
	Procedures	YES	Appendix 1 Section 8 – SFI standards development and interpretations process 1. Procedures for SFI standard revision 1. 2 Procedures contains a provision that stakeholders should be invited to provide their comments both on standards and the standard-setting process: "The start of the standards review process and all subsequent public review periods shall be communicated publicly to all interested stakeholders with an invitation to provide comments on the standards and standard setting process".
d) an invitation to comment on the scope and the standard-setting process, and			Conclusion - conforms
and the standard-setting process, and			Both the invitation and the announcement include an invitation to comment on the scope – standards, but not on the standard-setting process.
	Process	YES	SFI sent out a request for any stakeholder wanting to participate on a Task group on Standard review. The information was communicated to >9000 stakeholders.
			Conclusion - conforms
e) reference to publicly available standard-setting procedures	Procedures	YES	Provision on the public availability of standard-setting procedures is included into Appendix 2 Section 8 – SFI standards development and interpretations process 1. Procedures for SFI standard revision 1. 2 Procedures: "The public announcement will include where to find the publicly available standards-setting procedures".
			Conclusion - conforms

Question	Assess basis*	YES /NO*	Reference to application documents and comments
	Process	YES with comment	 The second 60-day public comment period (January – March 2014) was initiated via email, press release and posting to the SFI website the online survey tool. This tool allowed anyone to comment on all sections of the SFI 2015–2019 Standards and Rules (including Section 1 on Standard and Section 8 on Standard Development and Interpretations) Announcement on the second consultation had links to the draft SFI Standards and Rules document including standard setting. At this stage a request to comment standard setting rules was made (see Appendices 10 and 11) In the first consultation round in June 2013 there were no reference to publicly available standard-setting procedures (cf. the invitation (Appendix 6) and the press release (Appendix 8)). Conclusion – conforms with a comment Comment: Public was asked to comment on the standard setting procedures in the second consultation had been already published.
5.4 The standardizing body shall review the standard-setting process based on comments received from the public announcement and establish a working group/committee or adjust the composition of an already existing working group/committee based on received nominations. The acceptance and refusal of nominations shall be justifiable in relation to the requirements for balanced representation of the working group/committee and resources	Procedures	YES	The SFI second consultation round requested comments also to standard setting procedures , i.e. to Section 8 on SFI Standards Development and Interpretations Process. SFI has considered all requests for those who want to work in the standards setting process. The Resources Committee and numerous working groups/committees function as the groups that reviews all comments received from the open written comment periods and workshops. These working groups then develop recommended changes to the standards for SFI Board consideration. The External Review Panel (ERP) shall independently monitor the entire process including a review of all comments received on draft standards and their disposition. Conclusion - conforms Qualification criteria in nomination to the Standard Setting Task group included commitment, awareness of certification/SFI and resources to participate in the work. For Task Groups and other working groups SFI did not need to refuse the participation of interested stakeholders.
available for the standard setting.	Process	N.A.	Conclusion No comments on standard setting procedures were given during the first or second consultation.

Question	Assess basis*	YES /NO*	Reference to application documents and comments			
5.5 The work of the working group/commit	tee shall be orga	anized in an o	pen and transparent manner where:			
a) working drafts shall be available to all members of the working	Procedures	YES	Appendix 1 Section 8 – SFI standards development and interpretations process 1. Procedures for SFI standard revision 1. 2 Procedures "The draft of proposed changes to the SFI Standards shall be released and published to the SFI website during the first quarter of the second review year, followed by an additional 60-day public comment period to allow all stakeholders an opportunity to provide additional comments regarding proposed changes".			
group/committee,						
	Process	YES	The working drafts were circulated via email and through webinars.			
			Conclusion - conforms			
		YES	SFI 2015–2019 SFI Standards Revision Task Group Expectations – Appendix 8 outlines the procedures for standard drafting working group and related decision making.			
b) all members of the working group	Procedures		The SFI Resource Committees addressing comments and the External Review Panel aim at concensus-based decisions along with the other working groups involved in standard development.			
shall be provided with meaningful opportunities to contribute to the			The SFI Board respects its SFI Inc. By-laws (2013) in decision making.			
development or revision of the standard			Appendix 1 Section 8 – SFI standards development and interpretations process 1. Procedures for SFI standard revision 1. 2 Procedures "The draft of proposed changes to the SFI Standards shall be released and published to the SFI website during the first quarter of the second review year, followed by an additional 60-day public comment period to allow all stakeholders an opportunity to provide additional comments regarding proposed changes". Conclusion - conforms The working drafts were circulated via email and through webinars. Conclusion - conforms SFI 2015–2019 SFI Standards Revision Task Group Expectations – Appendix 8 outlines the procedures for standard drafting working group and related decision making. The SFI Resource Committees addressing comments and the External Review Panel aim at concensus-based decisions along with the other working groups involved in standard development. The SFI Board respects its SFI Inc. By-laws (2013) in decision making. Conclusion - conforms Participation in working groups aimed at 2/3 attendance; non-participating members were given an opportunity to comment. Conference calls were used to maximize the participation and joint working on the draft documents. Conclusion - conforms The openness and transparency in considering comments, as well as the requirement for keeping records regarding them are encrypted into the Appendix 2 Section 8 – SFI standards development and interpretations process 1. Procedures for SFI standard revision 1. 2 Procedures: "The SFI Standards development process is open, transparent and consensus-based The Forum shall maintain records regarding all comments and their disposition for re			
and submit comments to the working drafts, and	Process	YES	Participation in working groups aimed at 2/3 attendance; non-participating members were given an opportunity to comment. Conference calls were used to maximize the participation and joint working on the draft documents.			
			Conclusion - conforms			
c) comments and views submitted by any member of the working group/committee shall be considered in an open and transparent way and their resolution and proposed changes shall be recorded.	Procedures	YES	The openness and transparency in considering comments, as well as the requirement for keeping records regarding them are encrypted into the Appendix 2 Section 8 – SFI standards development and interpretations process 1. Procedures for SFI standard revision 1. 2 Procedures: "The SFI Standards development process is open, transparent and consensus-based…The Forum shall maintain records regarding all comments and their disposition for review by the independent External Review Panel. All comments will be considered carefully and records of their disposition maintained for a minimum of five years and posted to the SFI website. As in any review process, it is not necessary to agree to every suggestion, but it is important that all comments be given			

Question	Assess basis*	YES /NO*	Reference to application documents and comments
			reports and stakeholder comments submitted during both public comment periods and how they were addressed shall be publicly available and also maintained for a minimum of five years." Conclusion - conforms
	Process	YES	<text></text>

[©] Indufor Assessment of the Revised Sustainable Forestry Initiative (SFI) Programme Against PEFC Council Requirements – PEFC Council Checklist PEFC IGD 1007-01:2012., Final draft report, June 20, 2016. 23

Question	Assess basis*	YES /NO*	Reference to application documents and comments
5.6 The standardizing body shall organize a public consultation on the enquiry draft and shall ensure that:			
a) the start and the end of the public consultation is announced in a timely manner in suitable media,	Procedures	YES	Appendix 2 Section 8 – SFI standards development and interpretations process 1. Procedures for SFI standard revision 1. 2 Procedures requires that the timeframe of the public consultation is communicated publicly to all stakeholders: "The start of the standards review process and all subsequent public review periods shall be communicated publicly to all interested stakeholders with an invitation to provide comments on the standards and standard setting process The process shall include an initial 60 day public comment period, a second 60 day public comment period (the enquiry draft) and a final draft review period of at least 45 days". Conclusion - conforms Appendix 9 – SFI seeks input for standard revision contains a clear start and end date of the public second for the second enquire draft (leavenue 0. March 6. 2004)
	Process		public consultation on the second enquiry draft (January 6 – March 6, 2014). Consultation on the draft standard (60 days) was held in early 2014 as appropriate Conclusion - conforms.
b) the invitation of disadvantaged and key stakeholders shall be made by means that ensure that the information reaches its recipient and is understandable,	Procedures	YES	Appendix 2 Section 8 – SFI standards development and interpretations process 1. Procedures for SFI standard revision 1. 2 Procedures requires that disadvantaged and key stakeholders are invited and that the invitation reaches them: "This mapping exercise will be done at the beginning of each standard review process and will define who the stakeholders are and what is necessary to ensure all can participate in the process if they so choose Stakeholders —including disadvantaged and key stakeholders shall be invited to participate in the review process". Conclusion - conforms
	Process	YES	The invitation has been <u>sent by email</u> and through a <u>press release</u> available on the <u>website</u> , what is considered a sufficient means for ensuring that the information reaches its recipient and is understandable.

[©] Indufor Assessment of the Revised Sustainable Forestry Initiative (SFI) Programme Against PEFC Council Requirements – PEFC Council Checklist PEFC IGD 1007-01:2012., Final draft report, June 20, 2016. 24

Question	Assess basis*	YES /NO*	Reference to application documents and comments
			JANUARY 7. 2014 Sustainable Forestry Initiative® (SFI®) Reaches Out to Thousands to Improve Forestry Standard WASHINGTON, D.C. and OTTAWA, ON – In one of the most expansive and inclusive processes to seek input from a resource sector, the Sustainable Forestry Initiative® (SFI®) has invited nearly 10,000 stakeholders to submit comments on the draft SFI 2015-2019 Standard in its second 60-day public comment period. This open and public comment period runs from January 6 – March 6, 2014 and provides a transparent opportunity for anybody interested in the future of our forests to provide comment. The draft SFI 2015-2019 Standard includes new performance measures to conserve biodiversity in fiber sourcing; limit conversion of one forest type to another; and expand the definition of "controversial sources," which are not allowed in SFI-labeled products. (français v) Read More Conclusion – conforms Email and press release (media) and Internet are adequate communication channels to meet also disadvantaged and key stakeholders in the US and Canada.
c) the enquiry draft is publicly available and accessible,	Procedures	YES	Appendix 2 Section 8 – SFI standards development and interpretations process 1. Procedures for SFI standard revision 1. 2 Procedures contains a requirement on public availability and accessibility of the draft: "The draft of proposed changes to the SFI Standards shall be released and published to the SFI website This draft will also be presented to and discussed with SFI Program Participants and all other stakeholders at regional workshops conducted by the Forum and SFI Inc. throughout the U.S. and Canada". Conclusion - conforms According to the announcement the enquiry draft was available for commenting on the SFI website
	Process	YES	http://www.sfiprogram.org/comment-on-standard/ Conclusion - conforms
d) the public consultation is for at least 60 days,	Procedures	YES	A specific 60-day requirement for public consultations is included into the Appendix 2 Section 8 – SFI standards development and interpretations process 1. Procedures for SFI standard revision 1. 2 Procedures: <i>"The process shall include an initial 60-day public comment period, <u>a</u> <u>second 60 day public comment period (the inquiry draft)</u> and a final draft review period of at least 45 days".</i>

Question	Assess basis*	YES /NO*	Reference to application documents and comments
			Two public consultations are carried out on the revised standard draft. The second consultation period 60 days is on the new draft standard.
	Process	YES	Appendix 9 – SFI seeks input for standard revision states that the public consultation lasted for 60 days from January 6 to March 6, 2014.
			Conclusion - conforms
	Procedures	YES	Monitoring objectiveness of comment consideration is the task of the SFI External Review Panel. Appendix 2 Section 8 – SFI standards development and interpretations process 1. Procedures for SFI standard revision 1.1.3 SFI External Review Panel: "As part of the Forum, Panel members provide external independent oversight to ensure the standard revision process is objective and credible and that all comments are treated equally and fairly".
e) all comments received are considered			Conclusion - conforms
by the working group/committee in an objective manner,		YES	Records regarding comments and proposed changes for the enquiry draft have been published on the SFI website.
	Process		Conclusion - conforms
			The comments were addressed by the External Review Panel, which increases their objective consideration.
f) A synopsis of received comments compiled from material issues, including the results of their consideration, is publicly available, for example on a website.	Procedures	YES	The requirement for public availability of comments is also included into the Appendix 2 Section 8 – SFI standards development and interpretations process 1. Procedures for SFI standard revision 1. 2 Procedures: "The Forum shall maintain <u>records regarding all comments</u> and their disposition for review by the independent External Review Panel. All comments will be considered carefully and <u>records of their disposition maintained for a minimum of five years and posted to the SFI website</u> . As in any review process, it is not necessary to agree to every suggestion, but it is important that all comments be given considerationAdditional information on the SFI Standards development process, regional workshop reports and stakeholder comments submitted during both public comment periods and how they were addressed shall be publicly available and also maintained for a minimum of five years."
	Process	YES	Records regarding comments and proposed changes for the enquiry draft have been published on the SFI website. <u>http://www.sfiprogram.org/sfi-standard-2010-2014/introduction-to-the-standard/standard-review-process/</u>

Question	Assess basis*	YES /NO*	Reference to application documents and comments
			wmmsdfprogram.org/tif-standard.2010-2014/introduction-to-the-standard/standard server C Q. Servin Image: Comparison of Community interval and intervalation and intervaland and interval and interval and interval and
			of Responses to Comments submitted during the first public comment period is available; and a summary of the final Peal Comment Period Comments on the January 2014 Draft SP 2015-0019 Standard Language 5500000000000000000000000000000000000
			Image: Instance of the lange with the constraints' more starting in the lange with the constraints' more starting in the lange with the lange with the constraints' more starting in the lange with the
			Notes to a Synac Cantons target. Name: Cantons to a Synac Cantons to a synaphie to a Synac Canton target. Name: Canton target to a Synac Canton target. Notes to a Synac Canton target. Name: Canton target to a Synac Canton target. Name: Canton target to a Synac Canton target. Name: Canton target to a Synac Canton target.
5.7 The standardizing body shall organize pilot testing of the new	Procedures	N.A. with comment	Conclusion - conforms Pilot testing is not addressed in the SFI rules. Conclusion – conforms with a comment

Question	Assess basis*	YES /NO*	Reference to application documents and comments
standards and the results of the pilot testing shall be considered by the working group/committee.			Pilot testing has not been relevant recently, because the SFI standard undergoes its fifth revision. Comment : However, the system should set some rules on testing, e.g. on which conditions it should be considered.
	Process	YES	No pilot has been needed as the SFI 2015–2019 is the fifth version of the SFI standards.
5.8 The decision of the working group to recommend the final draft for formal approval shall be taken based on a consensus.	Procedures	YES	Consensus nature of decision-making is encrypted into the Appendix 2 Section 8 – SFI standards development and interpretations process 1. Procedures for SFI standard revision 1. 2 Procedures: "The SFI Standards development process is open, transparent and consensus based, and SFI Inc. <u>Board decisions</u> regarding final changes to the SFI Standards shall be consistent with PEFC ST 1001:2010 for consensus-based decision making The SFI Inc. Board of Directors voting structure in the SFI Inc. bylaws defines the consensus based approach used for final approval of revisions to the SFI Standard: a minimum of eighty percent of those present, which must include at least two representatives of each Sector [environmental, social, economic] is required to approve any action of the Board". Conclusion - conforms SFI Board makes the final decision and approval on the standard. Task Force (e.g. Standard Review Task Group) provides proposals. Decision-making procedures aim at consensus decisions.
	Process	YES	Minutes of the SFI Board meeting (Nov 5, 2014) Conclusion – conforms
5.8 In order to reach a consensus the work	king group/comr	nittee can util	The SFI Board agreed on the standard in consensus. ize the following alternative processes to establish whether there is opposition:
a) a face-to face meeting where there is a verbal yes/no vote, show of hands for a yes/no vote; a statement on consensus from the Chair where there are no dissenting voices or hands (votes); a formal balloting process, etc.,	Procedures	YES	Appendix 2 Section 8 – SFI standards development and interpretations process 1. Procedures for SFI standard revision 1. 2 Procedures has a reference to PEFC ST 1001:2010 to determine consensus-based decision making principles: "The SFI Standards development process is open, transparent and consensus based, and SFI Inc. Board decisions regarding final changes to the SFI Standards shall be consistent with PEFC ST 1001:2010 for consensus-based decision making" Conclusion - conforms SFI consensus procedures apply the requirements of the PEFC ST 1001:2010 for consensus-based decision making.

Question	Assess basis*	YES /NO*	Reference to application documents and comments
	Process	YES	 Appendix 19 – SFI Board meeting minutes – November 5, 2014 demonstrates a unanimous decision of the SFI Board to adopt the final draft. Task group, Resource committee, Steering group applied face to face meetings and conference calls. SFI Board also use face to face meetings and conference calls. Any material to be discussed shall be submitted 45 days before the Board meeting to allow time to comment. SFI Board meeting minutes on Nov 5, 2015 on standard approval is presented in Appendix 19. Conclusion - conforms
b) a telephone conference meeting where there is a verbal yes/no vote,	Procedures	YES	Appendix 2 Section 8 – SFI standards development and interpretations process 1. Procedures for SFI standard revision 1. 2 Procedures has a reference to PEFC ST 1001:2010 to determine consensus-based decision making principles: "The SFI Standards development process is open, transparent and consensus based, and SFI Inc. Board decisions regarding final changes to the SFI Standards shall be consistent with PEFC ST 1001:2010 for consensus-based decision making" Conclusion – conforms SFI consensus procedures apply the requirements of the PEFC ST 1001:2010 for consensus-based decision making
	Process	YES	Appendix 19 – SFI Board meeting minutes – November 5, 2014 demonstrates a unanimous decision of the SFI Board to adopt the final draft. Conclusion - conforms
c) an e-mail meeting where a request for agreement or objection is provided to members with the members providing a written response (a proxy for a vote), or	Procedures	YES	Appendix 2 Section 8 – SFI standards development and interpretations process 1. Procedures for SFI standard revision 1. 2 Procedures has a reference to PEFC ST 1001:2010 to determine consensus-based decision making principles: "The SFI Standards development process is open, transparent and consensus based, and SFI Inc. Board decisions regarding final changes to the SFI Standards shall be consistent with PEFC ST 1001:2010 for consensus-based decision making" Conclusion - conforms SFI consensus procedures apply the requirements of the PEFC ST 1001:2010 for consensus-based decisions
	Process	YES	Appendix 19 – SFI Board meeting minutes – November 5, 2014 demonstrates a unanimous decision of the SFI Board to adopt the final draft. Conclusion - conforms

Question	Assess basis*	YES /NO*	Reference to application documents and comments
d) Combinations thereof.	Procedures	YES	Appendix 2 Section 8 – SFI standards development and interpretations process 1. Procedures for SFI standard revision 1. 2 Procedures has a reference to PEFC ST 1001:2010 to determine consensus-based decision making principles: "The SFI Standards development process is open, transparent and consensus based, and SFI Inc. Board decisions regarding final changes to the SFI Standards shall be consistent with PEFC ST 1001:2010 for consensus-based decision making" Conclusion – conforms SFI consensus procedures apply the requirements of the PEFC ST 1001:2010 for consensus-based decision making.
	Process	YES	Appendix 19 – SFI Board meeting minutes – November 5, 2014 demonstrates a unanimous decision of the SFI Board to adopt the final draft. Conclusion - conforms
5.9 In the case of a <u>negative vote which re</u> resolved using the following mechanism(s		ned opposition	n to any important part of the concerned interests surrounding a substantive issue, the issue shall be
a) discussion and negotiation on the disputed issue within the working group/committee in order to find a compromise,	Procedures	YES	Appendix 2 Section 8 – SFI standards development and interpretations process 1. Procedures for SFI standard revision 1. 2 Procedures has a reference to PEFC ST 1001:2010 to determine consensus-based decision-making principles: "The SFI Standards development process is open, transparent and consensus based, and SFI Inc. Board decisions regarding final changes to the <u>SFI Standards shall be consistent with PEFC ST 1001:2010 for</u> consensus-based decision making If the Resources Committee does not achieve consensus, the issue (s) will be moved forward to the SFI Board of Director for final resolution <u>either by consensus or according to voting procedures</u> outlined in the <u>SFI Board Director bylaws</u> (http://www.sfiprogram.org/about-us/sfi-governance/). All recommendations developed by the task groups will be reviewed by the Board and may be accepted as is, modified, or returned to the task groups with instructions for additional consideration and discussion." SFI By-laws http://www.sfiprogram.org/files/pdf/2012-10-15-sfi-inc-bylaws-finalpdf/: : it shall take a minimum of sixty-six percent (66%) of those present to approve any action of the Board except where provided otherwise by law or by Article III.3.1 of these Bylaws Conclusion – conforms

Question	Assess basis*	YES /NO*	Reference to application documents and comments
			SFI consensus procedures apply the requirements of the PEFC ST 1001:2010 for consensus-based decision making
	Process	N.A.	No substantial disputes were recorded in any of the working groups on the forest management standard development
b) direct negotiation between the stakeholder(s) submitting the objection and stakeholders with different views on the disputed issue in order to find a compromise,	Procedures	YES	Appendix 2 Section 8 – SFI standards development and interpretations process 1. Procedures for SFI standard revision 1. 2 Procedures has a reference to PEFC ST 1001:2010 to determine consensus-based decision making principles: <i>"The SFI Standards development process is open,</i> <i>transparent and consensus based, and SFI Inc. Board decisions regarding final changes to the SFI</i> <i>Standards shall be consistent with PEFC ST 1001:2010 for consensus-based decision making"</i> Conclusion– conforms SFI consensus procedures apply the requirements of the PEFC ST 1001:2010 for consensus-based decision making.
Process N.A.	N.A.	Conclusion - No substantial stakeholder opposition or dispute was recorded in the forest management standard development	
c) Dispute resolution process.	Procedures	YES	Appendix 2 Section 8 – SFI standards development and interpretations process 1. Procedures for SFI standard revision 1. 2 Procedures has a reference to PEFC ST 1001:2010 to determine consensus-based decision making principles: "The SFI Standards development process is open, transparent and consensus based, and SFI Inc. Board decisions regarding final changes to the SFI Standards shall be consistent with PEFC ST 1001:2010 for consensus-based decision making" Consensus is a process that involves seeking to take into account the views of all parties concerned and to reconcile any conflicting arguments" Conclusion – conforms SFI consensus procedures apply the requirements of the PEFC ST 1001:2010 for consensus-based decision making
	Process	N.A.	Conclusion - No dispute requiring a dispute resolution process were recorded
	Procedures	YES	This requirement for public availability of documentation regarding implementation of the standard- setting process is included into:

Question	Assess basis*	YES /NO*	Reference to application documents and comments		
			 Appendix 2 SFI Inc. Policies and Procedures Sustainable Forestry Initiative Inc. Records Retention Policy VI SFI STANDARDS AND GUIDELINES DOCUMENTS: "All final documents used in research and development of standards, specifications, or guidelines (including revisions and reaffirmations) shall be retained for a minimum of one standards development cycleThese include background information, ballots, meeting books of standards committees, letters of interpretations, and documentation of standards provisions". Appendix 2 Section 8 – SFI standards development and interpretations process 1. Procedures for SFI standard revision 1. 2 Procedures: "The Forum shall maintain records regarding all comments and their disposition for review by the independent External Review Panel. All comments will be considered carefully and records of their disposition maintained for a minimum of five years and posted to the SFI website". 		
5.10 Documentation on the implementation of the standard-setting process shall be made publicly available.	Process	YES	Conclusion - Control - Co		

Question	Assess basis*	YES /NO*	Reference to application documents and comments
			A summary of main enhancements and responses to comments received during consultations are also available on the SFI webpage. Conclusion - conforms
5.11 The standardizing body shall formally approve the standards/normative documents based on evidence of consensus reached by the working group/committee.	Procedures	YES	Consensus-based approval of standards is encrypted into the Appendix 2 Section 8 – SFI standards development and interpretations process 1. Procedures for SFI standard revision 1. 2 Procedures: "The SFI Inc. Board of Directors voting structure in the SFI Inc. bylaws defines the consensus based approach used for final approval of revisions to the SFI Standard: a minimum of eighty percent of those present, which must include at least two representatives of each Sector [environmental, social, economic] is required to approve any action of the Board". Conclusion– conforms The Standard Review Task Force drafting the standard proposal shall aim at consensus decisions. The SFI Board finalizing, approving and adopting the standard in the SFI System shall also make consensus decisions.
	Process YES		Appendix 19 – SFI Board meeting minutes – November 5, 2014 demonstrates a unanimous decision of the SFI Board to adopt the final draft. Conclusion - conforms
5.12 The formally approved standards/normative documents shall be published in a timely manner and made publicly available.	Procedures	YES	Public availability of the final versions of standards is mentioned in the Appendix 2 Section 8 – SFI standards development and interpretations process 1. Procedures for SFI standard revision 1. 2 Procedures: <i>"The SFI Standards shall be finalized by the Forum, approved by the SFI Board, and</i> <i>published to the SFI program website. Printed copies will be available during the first quarter of the</i> <i>following year".</i> Conclusion– conforms SFI Inc. promptly publishes information on Board decisions on the web page. The documentation has defined the deadline for publishing the printed version of the standard.
	Process YES		According to the SFI, the SFI standards and rules were posted on the SFI webpage on January 1, 2015. <u>http://www.sfiprogram.org/sfi-standard/guide-to-2015-2019-standards/</u> Conclusion - conforms

[©] Indufor Assessment of the Revised Sustainable Forestry Initiative (SFI) Programme Against PEFC Council Requirements – PEFC Council Checklist PEFC IGD 1007-01:2012., Final draft report, June 20, 2016. 33

Question	Assess basis*	YES /NO*	Reference to application documents and comments	
			<section-header>Guide to 2015-2019 StandardsAn Overview of the Requirements for the SFI 2015-2019 ProgramThe Requirements for the SFI 2015-2019 Program address all of SFI's standards, rules for label use, procedures, and guidance for the program.SFI 2015-2019 Standards and Rules ful package • Section 1. Introduction • Section 2. SFI 2015-2019 Fibre Sourcing Standard• Section 3. SFI 2015-2019 Fibre Sourcing Standard • Section 4. SFI 2015-2019 Fibre Sourcing Standard• Section 4. SFI 2015-2019 Chemo-focustody Standard</br></section-header>	
		Revisio	ns of standards/normative documents	
6.1 The standards/normative documents shall be reviewed and revised at intervals that do not exceed a five-year period. The procedures for the revision of the standards/normative documents shall follow those set out in chapter 5.	Process	YES	http://www.sfiprogram.org/media-resources/news/sfi-inc-launches-new-standard-leads-forest- certification-forward/ The SFI 2010-2014 standard review process started in June 2008, SFI 2015–2019 – in June 2013, therefore the time requirement for the standard revision has been met. Conclusion - conforms	

6.2 The revision shall define the application date and transition date of the revised standards/normative documents.	Process	YES	The end of the transition (December 31, 2015) is defined Appendix 2 Section 8 – SFI standards development and interpretations process 2. Development of the SFI 2015–2019 standards and rules . Procedures for SFI standard revision 1. 2 Procedures: "All Program Participants have one year to fully implement new and revised SFI Standards elements adopted by the Forum". Appendix 6 Guidance to SFI 2015–2019 Standards and Rules16. Transition to the SFI 2015– 2019 Standards and Rules: SFI Program Participants have one year from the time the SFI 2015– 2019 Standards and Rules: SFI Program Participants have one year from the time the SFI 2015– 2019 Standards and Rules take effect on January 1, 2015 to implement all new and revised requirements, and Program Participants must demonstrate conformance to the new requirements at their first surveillance audit following the implementation period. Earlier adoption is encouraged. • Initial certification audits in 2015 must be conducted against the SFI 2015–2019 Standards and Rules. Standard approval November 5, 2014 Effective date January 1, 2015 Full conformance date January 1, 2016 Conclusion– conforms The application and transition dates are given in Section 6 on Guidance.
6.3 The application date shall not exceed a period of one year from the publication of the standard. This is needed for the endorsement of the revised standards/normative documents, introducing the changes, information dissemination and training.	Process	YES	The application date (January 1, 2015) and the end of the transition (December 31, 2015) are defined in Appendix 2 Section 8 – SFI standards development and interpretations process 2. Development of the SFI 2015–2019 standards and rules. One year-period is not exceeded. Conclusion – conforms The date of full conformance is a year from standard publication. The standard is applicable when published
6.4 The transition date shall not exceed a period of one year except in justified exceptional circumstances where the implementation of the revised standards/normative documents requires a longer period.	Process	YES	Appendix 2 Section 6 Guidance to SFI 2015–2019 Standards and Rules - 16. Transition to the SFI 2015–2019 Standards and Rules set a one-year period for transition to the SFI 2015-2019: "Changes adopted by the SFI Inc. Board of Directors to the SFI Standards must be incorporated into a Program Participant's policies, plans, and management activities within one year of adoption and publication. Similarly, changes to certification procedures and qualifications for certification bodies must be accomplished within one year of adoption and publication".Chapter 16:SFI Program Participants have one year from the time the SFI 2015–2019 Standards and Rules take effect on January 1, 2015 to implement all new and revised requirements, and Program

 Participants must demonstrate conformance to the new requirements at their first surveillance audit following the implementation period. Earlier adoption is encouraged. Initial certification audits in 2015 must be conducted against the SFI 2015–2019 Standards and Rules.
Same requirement is mentioned in Appendix 2 Section 8 – SFI standards development and interpretations process 1. Procedures for SFI standard revision 1. 2 Procedures: <i>"All Program</i> <i>Participants have one year to fully implement new and revised SFI Standards elements adopted by</i> <i>the Forum".</i>
Conclusion – conforms
Transition period conforms with the PEFC requirement. The term "Forum" refers to the SFI Board supported by theSFI Resource Committee

3 PART III: Standard and System Requirement Checklist for Sustainable Forest Management (PEFC ST 1003:2010)

Question	YES / NO*	Reference to scheme documentation				
General requirements for SFM standards						
4.1 The requirements for sustainable forest management defined by r	regional, na	tional or sub-national fore	est management standards shall			
a) Include management and performance requirements that are applicable at the forest management unit level, or at another level as appropriate, to ensure that the intent of all requirements is achieved at the forest management unit level.	YES	SFI 2015–2019 Forest Management Standard 1.1 Scope	 Observations: Standard includes 13 Principles (P) and 15 Objectives (O), 37 Performance measures (PM) with 101 Indicators (I) that set specific qualitative targets. Performance measures can be considered criteria requirements applicable at a level of a forest management organization. Indicators set mostly procedural requirements on programmes and procedures to address the required SFM elements. Audits will cover all three levels of the requirements. FMU level performance requirements are set in the organization level programmes and procedures. Scope: The SFI 2015–2019 Forest Management Standard applies to any organization that owns or has management authority for forestlands. The SFI 2015–2019 Forest Management Standard applies to organizations in the United States and Canada 			
		SFI 2015–2019 Forest Management Standard	Conclusion - conforms The indicators set qualitative FMU or organization level targets that are auditable			
b) Be clear, objective-based and auditable.	YES	101 indicators	Conclusion – conforms			
c) Apply to activities of all operators in the defined forest area who have a measurable impact on achieving compliance with the requirements.	YES	SFI Definitions	The standard refers to a SFI Program participant that is an organization certified by an accredited certification body to be in conformance with the SFI 2015–2019 Forest Management Standard, and/or SFI 2015–2019			

Question	YES / NO*	Reference to scheme documentation		
			Fiber Sourcing Standard and/or SFI 2015–2019 Chain-of-Custody Standard. The forest organization that applies for a certificate. Being a management system type standard the SFI 2015–2019 Forest Management Standard obliges a Program participant to ensure that the number of programs aiming at sustainable management are implemented, i.e. the US State Logging Association works with regional standard implementation committees and provide regular training. In Canada companies train loggers. Training obligation applies also to the	
			employees of contractors. The standard and the SFI program requires systematic contractor training. Conclusion - conforms	
d) Require record keeping that provides evidence of compliance with the requirements of the forest management standards.	YES	O 14, PM 14.2	 O14 Communication and public reporting. PM 14.2 Program Participants shall report annually to SFI Inc. on their conformance with the SFI 2015–2019 Forest Management Standard. I1 Prompt response to the SFI annual progress report survey. I2. Record keeping for all the categories of information needed for SFI annual progress report surveys. I3. Maintenance of copies of past survey reports to document progress and improvements to demonstrate conformance to the SFI 2015–2019 Forest Management Standard. Conclusion– conforms 	
	Specific rec	quirements for SFM star		
Criterion 1: Maintenance and appropriate enhancement of forest resources and their contribution to the global carbon cycle				

Question	YES / NO*	Reference to scheme documentation	
5.1.1 Forest management planning shall aim to maintain or increase forests and other wooded areas and enhance the quality of the economic, ecological, cultural and social values of forest resources, including soil and water. This shall be done by making full use of related services and tools that support land-use planning and nature conservation.	YES	 SFI 2015–2019 Forest Management Standard: Applies to all references in this section if not said otherwise. 	Conclusion– conforms
5.1.2 Forest management shall comprise the cycle of inventory and planning, implementation, monitoring and evaluation, and shall include an appropriate assessment of the social, environmental and economic impacts of forest management operations. This shall form a basis for a cycle of continuous improvement to minimize or avoid negative impacts.	YES	O1 Forest Management planning PM1.1 I1, I3 O15 Management review and continual improvement PM 15.1 I1, I2, I3	 PM 1.1 Program Participants shall ensure that forest management plans include long-term harvest levels that are sustainable and consistent with appropriate growth-and yield models. I1 Forest management planning at a level appropriate to the size and scale of the operation, including: a. a long-term resources analysis; b. a periodic or ongoing forest inventory; c. a land classification system; d. biodiversity at landscape scales; e. soils inventory and maps, where available; f. access to growth-and-yield modelling capabilities; g. up-to-date maps or a geographic information system (GIS); i. a review of non-timber issues (e.g. recreation, tourism, pilot projects and economic incentive programs to promote water protection, carbon storage, bioenergy feedstock production or biological diversity or to address climate-induced ecosystem change) Note that a. "long-term resource analysis extends to a period exceeding one rotation and it also covers non-timber forest products. Consideration of non-timber issues is mandatory on public lands and SFI standard set the requirement for private forestry. I.3. A forest inventory system and a method to calculate growth and yield.

		D (
Question	YES /	Reference to scheme	
	NO*	documentation	
			 O15. Management Review and Continual Improvement. To promote continual improvement in the practice of sustainable forestry by conducting a management review and monitoring performance. PM 15.1 Program Participants shall establish a management review system to examine findings and progress in implementing the SFI 2015–2019 Forest Management Standard, to make appropriate improvements in programs, and to inform their employees of changes. I1. System to review commitments, programs and procedures to evaluate effectiveness.
			 I2 System for collecting, reviewing, and reporting information to management regarding progress in achieving SFI 2015–2019 Forest Management Standard objectives and performance measures. I3. Annual review of progress by management and determination of changes and improvements necessary to continually improve conformance to the SFI 2015–2019 Forest Management Standard. I5. Documentation of forest practices (e.g., planting, fertilization and thinning) consistent with assumptions in harvest plans.
			 Performance Measure 9.1. Program Participants shall comply with applicable federal, provincial, state and local forestry and related social and environmental laws and regulations. Indicators: Access to relevant laws and regulations in appropriate locations. System to achieve compliance with applicable federal, provincial, state, or local laws and regulations. Demonstration of commitment to legal compliance through available regulatory action information.
			 PM 9.2. Program Participants shall take appropriate steps to comply with all applicable social laws at the federal, provincial, state and local levels in the country in which the Program Participant operates. Indicators: 1. Written policy demonstrating commitment to comply with social laws, such as those covering civil rights, equal employment opportunities, anti-discrimination and anti-harassment measures, workers' compensation, Indigenous Peoples' rights, workers' and communities' right to know,

[©] Indufor Assessment of the Revised Sustainable Forestry Initiative (SFI) Programme Against PEFC Council Requirements – PEFC Council Checklist PEFC IGD 1007-01:2012., Final draft report, June 20, 2016. 40

Question	YES / NO*	Reference to scheme documentation	
			 prevailing wages, workers' right to organize, and occupational health and safety. 2. Forestry enterprises will respect the rights of workers and labor representatives in a manner that encompasses the intent of the International Labor Organization (ILO) core conventions. Conclusion – conforms Regular inventory is required by the standard. Monitoring is linked to a management review that address the compliance with the SFI standard. The standard does not refer to other SFM monitoring obligations. Assessment of social, environmental and economic impacts is made part of a long-term management plan through careful definition of long-term sustainable harvesting levels and on-going long-term resource analysis of timber and non-timber resources.
5.1.3 Inventory and mapping of forest resources shall be established and maintained, adequate to local and national conditions and in correspondence with the topics described in this document.	YES	O1 Forest Management planning PM 1.1 I1, I3, I4	 PM 1.1 Program Participants shall ensure that forest management plans include long-term harvest levels that are sustainable and consistent with appropriate growth-and yield models. I1 Forest management planning at a level appropriate to the size and scale of the operation, including a. a long-term resources analysis; b. a periodic or ongoing forest inventory; c. a land classification system; e. soils inventory and maps, where available g. up-to-date maps or a geographic information system (GIS); h. recommended sustainable harvest levels for areas available for harvest; and i. a review of non-timber issues (e.g., recreation, tourism, pilot projects and economic incentive programs to promote water protection, carbon storage, bioenergy feedstock production, or biological diversity conservation, or to address climate-induced ecosystem change) I 3. A forest inventory system and a method to calculate growth and yield. I4. Periodic updates of forest inventory and recalculation of planned harvests to account for changes in growth due to productivity increases or

Question	YES / NO*	Reference to scheme documentation	
			decreases, including but not limited to improved data, long-term drought, fertilization, climate change, changes in forestland ownership and tenure, or forest health. Conclusion – conforms The scope of long-term forest inventory covers the key elements of SFM including non-timber values.
5.1.4 Management plans or their equivalents, appropriate to the size and use of the forest area, shall be elaborated and periodically updated. They shall be based on legislation as well as existing land- use plans, and adequately cover the forest resources.	YES	O1 Forest Management planning PM 1.1 I1, I4,	 PM 1.1 Program Participants shall ensure that forest management plans include long-term harvest levels that are sustainable and consistent with appropriate growth-and yield models. I1 Forest management planning at a level appropriate to the size and scale of the operation, including b. periodic or ongoing forest inventory d. biodiversity and landscape scales g. up-to-date maps or a geographic information system h. recommended sustainable harvest levels for areas available for harvest; and i. a review of non-timber issues (see also other elements under previous PEFC questions) I4. Periodic updates of forest inventory and recalculation of planned harvests to account for changes in growth Conclusion – conforms Plan is required. Revision cycles and content of planning requirements vary between private and public forestry in the US and Canada.
5.1.5 Management plans or their equivalents shall include at least a description of the current condition of the forest management unit, long-term objectives; and the average annual allowable cut, including its justification and, where relevant, the annually allowable exploitation of non-timber forest products.	YES	O1 Forest Management planning PM 1.1 I1	 PM 1.1 Program Participants shall ensure that forest management plans include long-term harvest levels that are sustainable and consistent with appropriate growth-and yield models. I1 Forest management planning at a level appropriate to the size and scale of the operation, including a long-term resources analysis; h. recommended sustainable harvest levels for areas available for harvest; and i. a review of non-timber issues

Question	YES / NO*	Reference to scheme documentation	
			a and i. address assessment of the sustainable production of non-wood products. Conclusion - conforms
5.1.6 A summary of the forest management plan or its equivalent appropriate to the scope and scale of forest management, which contains information about the forest management measures to be applied, is publicly available. The summary may exclude confidential business and personal information and other information made confidential by national legislation or for the protection of cultural sites or sensitive natural resource features.	YES with comment	SFI Standards and Rules Section 10 Communications and Public Reporting SFI Interpretation of the US Antitrust legislation Examples of audit reports	 Communications and Public Reporting – Section 10 A Program Participant shall provide a summary audit report (one copy must be in English) to SFI Inc. after the successful completion of certification, recertification, or surveillance audit to the SFI 2015–2019 Forest Management or Fiber Sourcing Standard. <u>The summary audit report will be posted on the SFI Inc. website</u> (www.sfiprogram.org) for public review. 1. The certification body shall prepare the SFI 2015–2019 <u>Forest Management Standard summary audit report</u>, which shall <u>include</u>, at a minimum: c. the name of Program Participant that was audited, including its SFI representative; d. a general description of the Program Participant's forest land and manufacturing operations included in the audits; This shall include: a <u>general description of the management plan</u> outlining forest management policies and objectives; an <u>outline of the area of ownership</u> (including the number of acres/hectares under management and key ecological features); a <u>general description of major timber types with a general characterization of management approaches</u> used (natural regeneration vs. planting, thinning, regimes, even-aged vs. unevenaged silvicultural). The <u>long-term harvest level</u> and the participant's conformance to this.

[©] Indufor Assessment of the Revised Sustainable Forestry Initiative (SFI) Programme Against PEFC Council Requirements – PEFC Council Checklist PEFC IGD 1007-01:2012., Final draft report, June 20, 2016. 43

Question	YES / NO*	Reference to scheme documentation	
			The US Antitrust legislation requires very precautionary measures in publishing information on company assets or business plans. This extends to information on forest resources and potential harvesting levels. Disclosure of any information that may be used to estimate supplies and demand at the market and thus allow e.g. adaptation of production in order to influence market prices is considered to violate the Antitrust legislation in the US. Conclusion – conforms with a comment. The SFI standard requires that certification bodies disclose information on forest management in certified entities. This arrangement does not risk that a certified forestry organization is claimed for violating the Antitrust legislation. The audit reports include general description of forest resources and planned activities, e.g. area and location certified, general management strategies on the area. Comment : SFI does not give more guidance on the required information that would ensure a more harmonized description of the forest management plans in audit reports. Audit reports are readily accessible at the SFI webpage (http://www.sfiprogram.org/audit-reports/)
5.1.7 Monitoring of forest resources and evaluation of their management shall be periodically performed, and results fed back into the planning process.	YES	O1 Forest management planning PM 1.1 O14 Communication and public reporting. PM 14.2	 PM 1.1. Program Participants shall ensure that forest management plans include long-term harvest levels that are sustainable and consistent with appropriate growth-and yield models. I1 b. a periodic or ongoing forest inventory PM 14.2 Program Participants shall report annually to SFI Inc. on their conformance with the SFI 2015–2019 Forest Management Standard.

Question	YES / NO*	Reference to scheme documentation	
		11. 12, 13	11 Prompt response to the SFI annual progress report survey.
		O15 Management review	2. Record keeping for all the categories of information needed for SFI annual progress report surveys.
		PM 15.1	3. Maintenance of copies of past survey reports to document progress
		1, 2, 3	and improvements to demonstrate conformance to the SFI 2015–2019 Forest Management Standard.
			 PM 15.1 Program Participants shall establish a management review system to examine findings and progress in implementing the SFI 2015–2019 Forest Management Standard, to make appropriate improvements in programs, and to inform their employees of changes. I1. System to review commitments, programs and procedures to evaluate effectiveness. I2. System for collecting, reviewing, and reporting information to management regarding progress in achieving SFI 2015–2019 Forest Management Standard objectives and performance measures. I3. Annual review of progress by management and determination of changes and improvements necessary to continually improve conformance to the SFI 2015–2019 Forest Management Standard.
			Conclusion – conforms
			The standard requires periodic or ongoing forest inventories and definition of sustainable long-term harvesting levels.
			In public forests periodic forest inventories or continuous monitoring of forest resources is stipulated by legislation at state (US) and provincial levels (Canada).
			Legislation does not oblige private forest owners to carry out inventories, but SFI Program requires periodic monitoring of forest resources.
			PM 12.1. Program Participants shall <u>support and promote efforts by</u> consulting foresters, state, provincial and federal agencies, state or local
5.1.8 Responsibilities for sustainable forest management shall be	YES	SFI 2015–2019 Forest management standard	groups, professional societies, conservation organizations, Indigenous
clearly defined and assigned.			Peoples and governments, <u>community groups</u> , sporting organizations,
			labor, universities, extension agencies, the American Tree Farm System®

Question	YES / NO*	Reference to scheme documentation	
			 and/or other landowner cooperative programs to apply principles of sustainable forest management. Indicators: Support, including financial, for efforts of SFI Implementation Committees. Support, individually or collaboratively, education and outreach to forest landowners describing the importance of and providing implementation guidance on: best management practices; reforestation and afforestation; visual quality management; conservation objectives, such as critical wildlife habitat elements, biodiversity, threatened and endangered species, and Forests with Exceptional Conservation Value; management of harvest residue (e.g., slash, limbs, tops) that considers economic, social and environmental factors (e.g., organic and nutrient value to future forests) and other utilization needs; control of invasive exotic plants and animals; characteristics of special sites; and reduction of wildfire risk. PM 12.3. Program Participants shall establish, at the state, provincial-or other appropriate levels, procedures to address concerns raised by loggers, consulting foresters, employees, unions, the public or other Program Participants regarding practices that appear inconsistent with the SFI 2015–2019 Forest Management Standard principles and other efforts) to address concerns about apparent nonconforming practices. Conclusion – conforms
L			

Question	YES / NO*	Reference to scheme documentation	
			 Program participant is responsible for standard implementation and compliance. Comprehensive loggers training programs supported by regional level SFI Implementation Committees and Program participant's responsibility to contribute to the work of the Committees ensure that all operators in certified forests are aware of the requirements. PM 1.1 Program Participants shall ensure that forest management plans include long-term harvest levels that are sustainable and consistent with
5.1.9 Forest management practices shall safeguard the quantity and quality of the forest resources in the medium and long term by balancing harvesting and growth rates, and by preferring techniques that minimize direct or indirect damage to forest, soil or water resources.		O1 Forest management planning PM 1.1 O2 Forest health and productivity PM2.3 I1 – I6 O3 Protection and maintenance of water resources PM 3.2 I1 – I4	 appropriate growth-and yield models. h. recommended sustainable harvest levels for areas available for harvest; and a review of non-timber issues PM 2.3 Program Participants shall implement forest management practices to protect and maintain forest and soil productivity. I1. Process to identify soils vulnerable to compaction, and use of appropriate methods, including the use of soil maps where available, to avoid excessive soil disturbance. I2. Use of erosion control measures to minimize the loss of soil and site productivity. I3. Post-harvest conditions conducive to maintaining site Productivity (e.g., limited rutting, retained down woody debris, minimized skid trails). I4. Retention of vigorous trees during partial harvesting, consistent with scientific silvicultural standards for the area. I5. Criteria that address harvesting and site preparation to protect soil productivity. I6. Road construction and skidding layout to minimize impacts to soil productivity. PM 3.2. Program Participants shall implement water; wetland and riparian protection measures based on soil type, terrain, vegetation n, ecological function, harvesting system, and state best management practices (BMPs), provincial guidelines and other applicable factors.

Final draft report, June 20, 2016.

Question	YES /	Reference to scheme	
	NO*	documentation	
			 I1. Program addressing management and protection of rivers, streams, lakes, wetlands, other water bodies and riparian areas during all phases of management, including the layout and construction of roads and skid trails to maintain water reach, flow and quality. I2. Mapping of rivers, streams, lakes, wetlands and other water bodies as specified in state or provincial best management practices and, where appropriate, identification on the ground. I3. Documentation and implementation of plans to manage and protect rivers, streams, lakes, wetlands, other water bodies and riparian areas. I4. Plans that address wet-weather events in order to maintain water quality (e.g., forest inventory systems, wet-weather tracts, definitions of acceptable operating conditions). Conclusion – conforms The standard sets procedural requirements for water and soil protection.
			The performance requirements are defined by state/province level best
5.1.10 Appropriate silvicultural measures shall be taken to maintain or reach a level of the growing stock that is economically, ecologically and socially desirable.	YES		 practices and/or organization level procedures. PM 2.1 Program Participants shall promptly reforest after final harvest. PM 2.3 Program Participants shall implement forest management practices to protect and maintain forest and soil productivity. PM 2.4. Program Participants shall manage to protect forests from damaging agents, such as environmentally or economically undesirable wildfire, pests, diseases, and invasive exotic plants and animals, to maintain and improve long-term forest health, productivity and economic viability. PM 2.5 Program Participants that deploy improved planting stock, including varietal seedlings, shall use best scientific methods. PM 4.1 Program Participants shall support and promote recreational opportunities for the public. PM 8.1 Program Participants shall recognize and respect Indigenous Peoples' rights.
			Conclusion conforms
			The standard does not specify any silvicultural methods in detail, because of the large and heterogeneous geographic area of application. The SFI

Question	YES / NO*	Reference to scheme documentation	
Question 5.1.11 Conversion of forests to other types of land use, including conversion of primary forests to forest plantations, shall not occur unless in justified circumstances where the conversion: a) is in compliance with national and regional policy and legislation relevant for land use and forest management and is a result of national or regional land-use planning governed by a governmental or other official authority including consultation with materially and directly interested persons and		O2 Forest health and productivity	 standard is also a management system standard that requires program participants to develop internal targets and procedures on e.g. on forest health; seedling improvement; protection of water quality using best management practices; protection of threatened and endangered species; conservation of sites for significant species of concern and protection of forests with exceptional conservation values. <i>PM1.2 Program Participants shall not convert <u>one forest cover type to another forest cover type</u>, unless in justified circumstances.</i> <i>I1. Program Participants <u>shall not convert</u> one forest cover type to another forest cover type, unless the conversion: a. Is in compliance with relevant national and regional <u>policy and legislation</u> related to land use and forest management; <u>and</u> b. Would not convert native forest types that are rare and ecologically significant at the landscape level or put any native forest types at risk of becoming rare; <u>and</u> c. <u>Does not create significant long-term adverse impacts</u> on Forests with Exceptional Conservation Value, old-growth forests, forests critical to threatened and endangered species, and special sites. </i>
organizations; and b) entails a small proportion of forest type; and	YES	PM 1.2, I1-I2 PM 1.3	 I2. Where a Program Participant intends to convert to another forest cover type, <u>an assessment considers</u>: a. Productivity and stand quality conditions and impacts which may <u>include social and economic values</u>;
 c) does not have negative impacts on threatened (including vulnerable, rare or endangered) forest ecosystems, culturally and socially significant areas, important habitats of threatened species or other protected areas; and 		11	b. Specific <u>ecosystem issues</u> related to the site such as invasive species, insect or disease issues, riparian protection needs and others as appropriate to the site including regeneration challenges; and c. <u>Ecological impacts</u> of the conversion including a review at the site and landscape scale as well as consideration for any appropriate mitigation measures.
 d) Contributes to long-term conservation, economic, and social benefits. 			PM 1.3 Program Participants shall not have within the scope of their certification to this SFI 2015–2019 Forest Management Standard, forestlands that have been converted to no forestland use.

5.1.12 Conversion of abandoned agricultural and treeless land into forestand shall be taken into consideration, whenever it can add economic ecological betaken into consideration, whenever it can add economic ecological betaken into consideration, whenever it can add economic ecological betaken into consideration, whenever it can add economic ecological aspects. VES VES<!--</th--><th>Question</th><th>YES /</th><th></th><th></th>	Question	YES /		
5.1.12 Conversion of abandoned agricultural and treeless land into forestland shall be taken into consideration, whenever it can add economic, ecological, social and/or cultural value YES O2 forest health and productivity Guidance to the SFI 2015–2019 Standards It is not the intent of Performance Measure 1 ecological benefit, such as returning a site to type, responding to forest health concerns, or	Question	NO*		In I1. Forestlands converted to other land uses shall not be certified to this SFI 2015–2019 Forest Management Standard. This does not apply to forestlands used for forest and wildlife management such as wildlife food plots or infrastructure such as forest roads, log-processing areas, trails etc. Conclusion - conforms The standard as such prohibits conversion to non-forest use and any conversion to other forest type requires an assessment including social and ecological aspects. The requirement on an assessment is broad and an assessment is very likely to include consultations. Regulations on land zoning, public land use at state/province and municipal levels apply on consultation and land use changes. As conversion is prohibited in general – the standard does not address
5.1.12 Conversion of abandoned agricultural and treeless land into forestland shall be taken into consideration, whenever it can add YES O2 forest health and productivity <i>Guidance to the SFI 2015–2019 Standards</i> M 2.1 PM 2.1				The Standard requirement " <i>in compliance with relevant national and regional <u>policy and legislation</u>" is interpreted to ensure that "<i>conversion shall be a result of national or regional land-use planning governed by a governmental or other official authority</i>".</i>
15 Conclusion - conforms	forestland shall be taken into consideration, whenever it ca		S PM 2.1	 PM 2.1 Program Participants shall promptly reforest after final harvest. I5Afforestation programs that consider potential ecological impacts of the selection and planting of tree species in non-forested landscapes. Guidance to the SFI 2015–2019 Standards and Rules - SFI Section 6 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).

Question	YES / NO*	Reference to scheme documentation	
Criterion 2: Maintenance of forest ecosystem health and vitality		·	·
5.2.1 Forest management planning shall aim to maintain and increase the health and vitality of forest ecosystems and to rehabilitate degraded forest ecosystems, whenever this is possible by silvicultural means.	YES	O1 Forest management planning O2 Forest health and productivity PM 2.1 I2, PM 2.3 I1, 2, 5 PM 2.4 I1-3	 PM 1.1. Program Participants shall ensure that forest management plans include long-term harvest levels that are sustainable and consistent with appropriate growth-and-yield models I1i a review of non-timber issues (e.g., recreation, tourism, pilot projects and economic incentive programs to promote water protection, carbon storage, bioenergy feedstock production, or biological diversity conservation or to address climate-induced ecosystem change). PM 2.1 Program Participants shall promptly reforest after final harvest. I2. Clear criteria to judge adequate regeneration and appropriate actions to correct understocked areas, achieve acceptable species composition, and stocking rates for planting, direct seeding and natural regeneration. Performance Measure 2.3. Program Participants shall implement forest management practices to protect and maintain forest and soil productivity. Indicators: I1. Process to identify soils vulnerable to compaction, and use of appropriate methods, including the use of soil maps where available, to avoid excessive soil disturbance. I2. Criteria that address harvesting and site preparation to protect soil productivity. I5. Criteria that address harvesting and site preparation to protect soil productivity. PM 2.4. Program Participants shall manage to protect forests from damaging agents, such as environmentally or economically undesirable wildfire, pests, diseases and invasive exotic plants and animals, to maintain and improve long-term forest health, productivity and economic viability. Indicators: PM 2.4. Program Participants sfall manage to protect forests from damaging agents, such as environmentally or economically undesirable wildfire, pests, diseases and invasive exotic plants and animals, to maintain and improve long-term forest health, productivity and economic viability. Indicators: PM 2.7. Program to protect forests from damaging agents.

Question	YES / NO*	Reference to scheme documentation	
			 2. Management to promote healthy and productive forest conditions to minimize susceptibility to damaging agents. 3. Participation in, and support of, fire and pest prevention and control programs. Conclusion- conforms Complying procedural standard requirements PM 2.4. Program Participants shall manage to protect forests from
5.2.2 Health and vitality of forests shall be periodically monitored, especially key biotic and abiotic factors that potentially affect health and vitality of forest ecosystems, such as pests, diseases, overgrazing and overstocking, fire, and damage caused by climatic factors, air pollutants or by forest management operations.	YES	O2 Forest health and productivity PM 2.4 I1, 2,3 O15 Management Review and Continual Improvement	 damaging agents, such as environmentally or economically undesirable wildfire, pests, diseases and invasive exotic plants and animals, to maintain and improve long-term forest health, productivity and economic viability. Indicators: Program to protect forests from damaging agents. Management to promote healthy and productive forest conditions to minimize susceptibility to damaging agents. Participation in, and support of, fire and pest prevention and control programs. PM 15.1. Program Participants shall establish a management review system to examine findings and progress in implementing the SFI 2015–2019 Forest Management Standard, to make appropriate improvements in programs, and to inform their employees of changes. Indicators: System to review commitments, programs and procedures to evaluate effectiveness. System for collecting, reviewing, and reporting information to management regarding progress in achieving SFI 2015–2019 Forest Management standard objectives and performance measures. Annual review of progress by management and determination of changes and improvements necessary to continually improve conformance to the SFI 2015–2019 Forest Management Standard

Question	YES / NO*	Reference to scheme documentation	
			Conclusion – conforms Standard requires annual monitoring of progress in the Program to protect forests from damages. The standard does not specify the scope of the forest health monitoring program, e.g. risk and occurrence of damage (e.g. wildlife or harvesting), disease, pest, fire is required either as part of a forest protection program or other monitoring. However, it requires that the program includes and
5.2.3 The monitoring and maintaining of health and vitality of forest ecosystems shall take into consideration the effects of naturally occurring fire, pests and other disturbances.	YES	O1 Forest management planning PM 1.1 I4, O2 Forest health and productivity PM 2.4 I2, 3 O4 conservation of biological diversity PM 4.1 I8	 minimizes the risk of any relevant damage. <i>PM 1.1. Program Participants shall ensure that forest management plans include long-term harvest levels</i> <i>I4 Periodic updates of forest inventory and recalculation of planned harvests to account for changes in growth due to productivity increases or decreases, including but not limited to: long-term drought, climate change, changes in forest health.</i> <i>PM 2.4. Program Participants shall manage to protect forests from damaging agents to maintain and improve long-term forest health, productivity</i> <i>I2. Management to promote healthy and productive forest conditions to minimize susceptibility to damaging agents.</i> <i>I3. Participation in, and support of, fire and pest prevention and control programs.</i> <i>PM 4.1 Program Participants shall conserve biological diversity</i> <i>I8 Consider the role of natural disturbances, including the use of prescribed or natural fire where appropriate, and forest health threats in relation to biological diversity when developing forest management plans Conclusion - conforms</i>

[©] Indufor Assessment of the Revised Sustainable Forestry Initiative (SFI) Programme Against PEFC Council Requirements – PEFC Council Checklist PEFC IGD 1007-01:2012.,

Question	YES / NO*	Reference to scheme documentation	
5.2.4 Forest management plans or their equivalents shall specify ways and means to minimize the risk of degradation of and damages to forest ecosystems. Forest management planning shall make use of those policy instruments set up to support these activities.	YES	documentation O1 Forest management planning O2 Forest health and productivity PM 2.4 I1-13 O4 Conservation of biological diversity PM 4.1 I4	 The risk of fires and pests is taken into consideration in revisions of forest management plans. Adaptive forest management and programs to promote healthy forest conditions mitigate the risk. Performance Measure 1.1. Program Participants shall ensure that forest management plans include long-term harvest levels that are sustainable and consistent with appropriate growth-and yield models. Indicators: Forest management planning at a level appropriate to the size and scale of the operation, including: a long-term resources analysis; biodiversity at landscape scales; soils inventory and maps, where available; a review of non-timber issues (e.g., recreation, tourism, pilot projects and economic incentive programs to promote water protection, carbon storage, bioenergy feedstock production, or biological diversity conservation, or to address climate-induced ecosystem change). PM 2.4. Program Participants shall manage to protect forests from damaging agents to maintain and improve long-term forest health, productivity Program to protect forests from damaging agents. Management to promote healthy and productive forest conditions to minimize susceptibility to damaging agents. PM 4.1 Program Participants shall conserve biological diversity I4Program Participants shall participate in or incorporate the results of state, provincial, or regional conservation planning and priority-setting efforts to conserve biological diversity and consider these efforts in forest
			management planning. Examples of credible priority-setting efforts include state wildlife action plans, state forest action plans, relevant habitat conservation plans or provincial wildlife recovery plans

[©] Indufor Assessment of the Revised Sustainable Forestry Initiative (SFI) Programme Against PEFC Council Requirements – PEFC Council Checklist PEFC IGD 1007-01:2012., Final draft report, June 20, 2016. 54

Question	YES / NO*	Reference to scheme documentation	
			The SFI standard requires that Program participants (SFI certified entity) have programs relevant in this context, on forest health, protection of threatened and endangered species, conservation of sites for significant species of concern, protection of Forests with Exceptional Conservation Values, seedling improvement and protection of water quality using best management practices. Conclusion – conforms The standard sets a procedural requirement on the program to protect forests, but does not specify its content by any means. The listed instruments focus on biodiversity.
5.2.5 Forest management practices shall make best use of natural structures and processes and use preventive biological measures wherever and as far as economically feasible to maintain and enhance the health and vitality of forests. Adequate genetic, species and structural diversity shall be encouraged and/or maintained to enhance the stability, vitality and resistance capacity of the forests to adverse environmental factors and strengthen natural regulation mechanisms.	YES	O2 Forest health and productivity PM 2.1, I1, 3 PM 2.4 I1 O4 Conservation of biological diversity PM 4.1 I1, 2, 3, 8 PM 4.3 I1 PM 4.4 I1, 2	 See PM 2.4 in PEFC Checklist question 5.2.3 11. Program to protect forests from damaging agents. PM 2.1 Program Participants shall promptly reforest after final harvest 11 Documented reforestation plan natural or planted or seeded 13 Planting of exotic tree species should minimize risk to native ecosystem 14 Protection of desirable natural regeneration during harvest PM 4.1 Program Participants shall conserve biological diversity 11Program to incorporate the conservation of native biological diversity, including species, wildlife habitats and ecological community types at stand and landscape levels. 12 Development of criteria and implementation of practices, as guided by regionally based best scientific information, to <u>retain stand-level wildlife habitat</u>, den trees and nest trees

Question	YES / NO*	Reference to scheme documentation	
			<i>I3</i> Working individually or collaboratively to support diversity of native forest cover types and age or size classes that enhance biological diversity at the landscape scale
			18 Consider the role of natural disturbances, including the use of prescribed or natural fire where appropriate, and forest health threats in relation to biological diversity when developing forest management plans
			PM 4.3. Program Participants shall manage ecologically important sites in a manner that takes into account their unique qualities. I1 Use of information such as existing natural heritage data or expert advice in identifying or selecting ecologically important sites for protection.
			PM 4.4. Program Participants shall apply knowledge gained through research, science, technology and field experience to manage wildlife habitat and contribute to the conservation of biological diversity.
			 11. 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 systems. Such participation may include providing non-proprietary scientific information, time and assistance by staff, or in-kind or direct financial support. 12. A methodology to incorporate research results and field applications of biodiversity and ecosystem research into forest management decisions.
			Conclusion - conforms
			The standard sets provisions to improve and maintain diversity in forests.
			The requirement to apply recent information and protect valuable sites sets elements to forest health protection programs (PM 2.4) that strengthen the natural ecosystem regulation and prevention of damages.

[©] Indufor Assessment of the Revised Sustainable Forestry Initiative (SFI) Programme Against PEFC Council Requirements – PEFC Council Checklist PEFC IGD 1007-01:2012.,

Question	YES / NO*	Reference to scheme documentation	
5.2.6 Lighting of fires shall be avoided and is only permitted if it is necessary for the achievement of the management goals of the forest management unit.	YES	O2 Forest health and productivity PM 2.4 I1, 3	 See PM 2.4 in PEFC Checklist question 5.2.3 I1. Program to protect forests from damaging agents. I3. Participation in, and support of, fire and pest prevention and control programs Conclusion - conforms The implementation of the program to protect forests and participation in fire prevention and control programs provide the evidence on a precautionary use of fire in forests.
 5.2.7 Appropriate forest management practices such as reforestation and afforestation with tree species and provenances that are suited to the site conditions or the use of tending, harvesting and transport techniques that minimize tree and/or soil damages shall be applied. The spillage of oil during forest management operations or the indiscriminate disposal of waste on forestland shall be strictly avoided. Non-organic waste and litter shall be avoided, collected, stored in designated areas and removed in an environmentally responsible manner. 	YES	O2 Forest health and productivity PM 2,1 I1, 5 PM 2.3 I1, 2, 5 O9 Legal and regulatory compliance PM 9.1 I3	 PM 2.1 Program Participants shall promptly reforest after final harvest 11 Documented reforestation <u>plan</u> natural or planted or seeded 15 Afforestation <u>programs</u> that consider potential ecological <u>impacts of the selection and planting of tree species</u> in non-forested landscapes In public forests seed transfer regulations apply, in private forestry forest owners decide on provenance used. Nurseries are obliged to provide reliable information on the genetic origin of seedlings PM 2.3. Program Participants shall implement forest management practices to protect and maintain forest and soil productivity. Indicators: 11. Process to identify soils vulnerable to compaction, and use of appropriate methods, including the use of soil maps where available, to avoid excessive soil disturbance. 12. Use of erosion control measures to minimize the loss of soil and site productivity. 15. Criteria that address harvesting and site preparation to protect soil productivity. 16. Road construction and skidding layout to minimize impacts to soil productivity

[©] Indufor Assessment of the Revised Sustainable Forestry Initiative (SFI) Programme Against PEFC Council Requirements – PEFC Council Checklist PEFC IGD 1007-01:2012.,

Question	YES / NO*	Reference to scheme documentation	
			 PM 9.1. Program Participants shall comply with applicable federal, provincial, state and local forestry and related social and environmental laws and regulations. I3. <u>Demonstration of commitment to legal compliance</u> through available regulatory action information. Spillage of oil is illegal in the US and Canada. Detailed provisions for Canada and the US regarding spills, disposal and waste are made in the Best Management Practices programs on water protection on a state and provincial level. (See US Clean Water Act and Canadian Fisheries Act). Conclusion - conforms Standard requirements are procedural and refer to legislation on waste management. Standard requirements or regulations on the use of appropriate tree species and provenances is not clearly indicated. These issues are often regulated at a state or provincial level in the US and Canada.
5.2.8 The use of pesticides shall be minimized and appropriate silvicultural alternatives and other biological measures preferred.	YES	O2 Forest health and productivity PM 2.2	 PM 2.2. Program Participants shall minimize chemical use required to achieve management objectives while protecting employees, neighbors, the public and the environment, including wildlife and aquatic habitats. I1. Minimized chemical use required to achieve management objectives. I6. Use of integrated pest management where feasible. Conclusion - conforms
5.2.9 The WHO Type 1A and 1B pesticides and other highly toxic pesticides shall be prohibited, except where no other viable alternative is available.	YES	O2 Forest health and productivity PM 2.2 I2, 3, 4, 5	PM 2.2 (See PEFC Checklist question 5.2.8) I2. Use of least-toxic and narrowest-spectrum pesticides necessary to achieve management objectives.

Question	YES / NO*	Reference to scheme documentation	
		O9 Legal and regulatory compliance	<i>13. Use of pesticides registered for the intended use and applied in accordance with label requirements.</i>
		PM 9.1 I1. 2. 3 Sec 6 Guidance to SFI 2015–2019 Standards and Rules O2 Prohibited chemicals	 14. The World Health Organization (WHO) type 1A and 1B pesticides shall be prohibited, except where no other viable alternative is available. 15. Use of pesticides banned under the Stockholm Convention on Persistent Organic Pollutants (2001) shall be prohibited. PM 9.1. Program Participants shall comply with applicable federal, provincial, state and local forestry and related social and environmental laws and regulations. 11 Access to relevant laws and regulations in appropriate locations. 12. System to achieve compliance with applicable federal, provincial, state, or local laws and regulations. 13. Demonstration of commitment to legal compliance through available regulatory action information SFI Guidance to SFI 2015–2019 Standards and Rules - Section 6 The intent of Performance Measure 2.2 is to minimize the chemical use required to achieve management objectives while ensuring the protection of employees, the public and the environment, including wildlife and aquatic habitats. To ensure these results are achieved, the
			<u>use of forest management pesticides must follow federal, state and local</u> <u>laws; follow the label instructions, and</u> be implemented with <u>proper</u> <u>equipment and training.</u> Furthermore, pesticides, such as chlorinated hydrocarbons whose derivates remain biologically active beyond their intended use, as well as pesticides banned .by international agreement, are prohibited for use by Program Participants. This last requirement is addressed by Indicators 2.2.4 and 2.2.5. Guidance to Indicator 2.2.4: The World Health Organization (WHO) type 1A and 1B pesticides shall be prohibited, except where no other viable alternative is available.

Question	YES /	Reference to scheme	
	NO*	documentation	
			It is the responsibility of the Program Participant to ensure that any chemical use in forest management avoids the use of chemicals on the WHO type 1A and 1B list of prohibited chemicals. In the rare exception where a Program Participant believes a variance on the prohibition on the use of a WHO type 1A and 1B chemical is warranted, the Program Participant will submit their rationale to their certification body for approval. The certification body will then monitor the chemical usage approved under this variance, should this variance be approved. 90 The WHO type 1A and 1B list of prohibited chemicals is at: http://www.who.int/ipcs/publications/pesticides_hazard_2009.pdf. Conclusion - conforms The standard sets compliant requirements. Chemicals are used in grass and coppice clearing, when allowed and economically/ecologically and socially feasible. States and Provinces list chemicals that are approved for forestry use. Only licensed persons may apply chemicals.
5.2.10 Pesticides, such as chlorinated hydrocarbons whose derivate remain biologically active and accumulate in the food chain beyond their intended use, and any pesticides banned by international agreement, shall be prohibited.	YES	O2 Forest health and productivity PM 2.2 I2, 3, 4, 5 O9 Legal and regulatory compliance PM 9.1 I1, 2, 3	 PM 2.2, PM 9.1 See PEFC Checklist question 5.2.9 Guidance to Indicator 2.2.5: Use of pesticides banned under the Stockholm Convention on Persistent Organic Pollutants (2001) shall be prohibited. It is the responsibility of the Program Participant to ensure that any chemical use in forest management conforms with the ban on the use of chemicals under the Stockholm Convention on Persistent Organic Pollutants (2001). There is no option of a variance for the use of chemicals banned under the Stockholm Convention (2001). The list of chemicals banned under the Stockholm Convention on Persistent Organic Pollutants is at:

Question	YES / NO*	Reference to scheme documentation	
		Sec 6 Guidance to SFI 2015–2019 Standards and Rules	http://chm.pops.int/TheConvention/ThePOPs/tabid/673/Default.aspx.
		O2 Prohibited chemicals	The Stockholm Convention on Persistent Organic Pollutants (2001) restricts the use of chlorinated hydrocarbons. The standard sets complying requirements.
5.2.11 The use of pesticides shall follow the instructions given by the pesticide producer and be implemented with proper equipment and training.	YES	O2 Forest health and productivity PM 2.2 I7, 8	 PM 2.2 See PEFC Checklist question 5.2.9 I7. Supervision of forest chemical applications by state- or provincial- trained or certified applicators. I8. Use of management practices appropriate to the situation, for example: a. notification of adjoining landowners or nearby residents concerning applications and chemicals used; b. appropriate multilingual signs or oral warnings; c. control of public road access during and immediately after applications; d. designation of streamside and other needed buffer strips; e. use of positive shutoff and minimal-drift spray valves; f. aerial application of forest chemicals parallel to buffer zones to minimize drift; g. monitoring of water quality or safeguards to ensure proper equipment use and protection of streams, lakes and other water bodies; h. appropriate transportation and storage of chemicals; i. filing of required state or provincial reports; and/or j. use of methods to ensure protection of threatened and endangered species. Conclusion – conforms The standard sets complying requirements. Only licensed persons may apply chemicals. Aerial spraying is applied in North-West and South East of US. State and municipal regulations set conditions on spraying.

Question	YES / NO*	Reference to scheme documentation	
5.2.12 Where fertilizers are used, they shall be applied in a controlled manner and with due consideration for the environment.	YES	O2 Forest health and productivity PM 2.2 I7, 8	 PM 2.2 See PEFC Checklist question 5.2.9 I1. Minimized chemical use required to achieve management objectives. I8. Use of management practices appropriate to the situation, for example: a. notification of adjoining landowners or nearby residents concerning applications and chemicals used; d. designation of streamside and other needed buffer strips; f. aerial application of forest chemicals parallel to buffer zones to minimize drift; g. monitoring of water quality or safeguards to ensure proper equipment use and protection of streams, lakes and other water bodies; j. use of methods to ensure protection of threatened and endangered species. Conclusion– conforms The standard sets complying requirements.
Criterion 3: Maintenance and encouragement of productive fun	ctions of for	rests (wood and non-wo	od)
5.3.1 Forest management planning shall aim to maintain the capability of forests to produce a range of wood and non-wood forest products and services on a sustainable basis.	YES	O1 Forest management planning PM 1.1 I1	 PM 1.1. Program Participants shall ensure that forest management plans include long-term harvest levels that are sustainable and consistent with appropriate growth-and-yield models. I1 Forest management planning at a level appropriate to the size and scale of the operation including d. biodiversity at landscape scales h. recommended sustainable harvest levels for areas available for harvest; and i. a review of non-timber issues recreation, tourism, pilot projects and economic incentive programs to promote water protection, carbon storage, bioenergy feedstock production, or biological

Question	YES / NO*	Reference to scheme documentation	
			diversity conservation, or to address climate-induced ecosystem change) Conclusion - conforms The scope of the planning shall cover a comprehensive range of forest products and services. The sStandard sets complying requirements
5.3.2 Forest management planning shall aim to achieve sound economic performance taking into account any available market studies and possibilities for new markets and economic activities in connection with all relevant goods and services of forests.	YES	O1 Forest management planning PM 1.1 I1 O7 Efficient use of fiber sources PM 7.1 I1 O10 Forest research, science and technology PM 10.1 PM 10.3	 PM 1.1. (see PEFC Checklist question 5.3.1) I1 Forest management planning at a level appropriate to the size and scale of the operation including a. a long-term <u>resources analysis;</u> b. a periodic or ongoing forest <u>inventory;</u> h. recommended <u>sustainable harvest levels</u> for areas available for harvest; and i. a review of non-timber issues PM 7.1 . Program Participants shall employ appropriate forest harvesting technology and in-woods manufacturing processes and practices to minimize waste and ensure efficient utilization of harvested trees, where consistent with other SFI Standard objectives I1 Program or monitoring system to ensure efficient utilization, which may include provisions to ensure: a. management of <u>harvest residue</u> (e.g., slash, limbs, tops) considers economic, social and environmental factors (e.g., organic and nutrient value to future forests and the potential of increased fuels build-up) and other utilization needs; b. training or incentives to encourage loggers to <u>enhance utilization;</u>

[©] Indufor Assessment of the Revised Sustainable Forestry Initiative (SFI) Programme Against PEFC Council Requirements – PEFC Council Checklist PEFC IGD 1007-01:2012., Final draft report, June 20, 2016. 63

Question	YES / NO*	Reference to scheme documentation	
			 c. <u>exploration of markets</u> for underutilized species and low-grade wood and alternative markets (e.g., bioenergy markets); or PM 10.1 Program Participants shall 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 products PM 10.3 Program Participants shall, broaden the awareness of climate change impacts on forests, wildlife and biological diversity.
5.3.3 Forest management plans or their equivalents shall take into account the different uses or functions of the managed forest area. Forest management planning shall make use of those policy instruments set up to support the production of commercial and non-commercial forest goods and services.	YES	O1 Forest management planning PM 1.1 I1 O3-O6 Management of water, BD, visual values and special sites, O8 indigenous people, O12 Community involvement I1 O9 Legal and regulatory compliance	Conclusion - conforms PM 1.1. (see PEFC Checklist question 5.3.1 and 5.3.2) PM 9.1. Program Participants shall comply with applicable federal, provincial, state and local forestry and related social and environmental laws and regulations. I1 Access to relevant laws and regulations in appropriate locations. I2. System to achieve compliance with applicable federal, provincial, state, or local laws and regulations. I3. Demonstration of commitment to legal compliance through available regulatory action information Conclusion - conforms The required scope for forest management planning covers different functions of forests. Compliance with planning provisions, legislation and standard requirements under Objectives 3-6, 8 and 12 require the consideration of different forest uses.
5.3.4 Forest management practices shall maintain and improve the forest resources and encourage a diversified output of goods and services over the long term.	YES	O Forest health and productivity PM 2.1 I1	 PM 2.1. Program Participants shall promptly reforest after final harvest. I1. Documented reforestation plans, including designation of all harvest areas for either natural, planted or direct seeded regeneration and prompt reforestation, unless delayed for site-specific environmental or forest

	YES /	Reference to scheme	
Question	NO*	documentation	
		PM 2.4 I1	health considerations or legal requirements, through planting within two years or two planting seasons, or by planned natural regeneration methods within five years.
			PM 2.4. Program Participants shall manage to protect forests from damaging agents, such as environmentally or economically undesirable wildfire, pests, diseases and invasive exotic plants and animals, to maintain and improve long-term forest health, productivity and economic viability.
			 Program to protect forests from damaging agents. Management to promote healthy and productive forest conditions to minimize susceptibility to damaging agents. Participation in, and support of, fire and pest prevention and control programs
			PM 2.5. Program Participants that deploy improved planting stock, including varietal seedlings, shall use best scientific methods.
			The measures to enhance forest resources focus on soil protection, regeneration and pest/damage prevention. Less attention is given to stand management during the rotation.
			See PEFC question 5.1.10
			Performance Measure 1.1. Program Participants shall ensure that forest management plans include long-term harvest levels that are sustainable and consistent with appropriate growth-and yield models. Indicators:
			 Forest management planning at a level appropriate to the size and scale of the operation, including: a review of non-timber issues (e.g., recreation, tourism, pilot projects and economic incentive programs to promote water protection, carbon storage, bioenergy feedstock production, or biological diversity conservation, or to
			address climate-induced ecosystem change).

[©] Indufor Assessment of the Revised Sustainable Forestry Initiative (SFI) Programme Against PEFC Council Requirements – PEFC Council Checklist PEFC IGD 1007-01:2012., Final draft report, June 20, 2016. 65

Question	YES / NO*	Reference to scheme documentation	
			The SFI standard requires that program participants develop internal targets and procedures on e.g. on forest health; seedling improvement; protection of water quality using best management practices; protection of threatened and endangered species; conservation of sites for significant species of concern and protection of Forests with Exceptional Conservation Values. The few standard requirements related to silvicultural procedures and the management programs require Program participants to develop and address diverse economic, ecological and social services and products forests can provide.
5.3.5 Regeneration, tending and harvesting operations shall be carried out in time, and in a way that does not reduce the productive capacity of the site, for example by avoiding damage to retained stands and trees as well as to the forest soil, and by using appropriate systems.	YES	O Forest health and productivity PM 2.1 I1 PM 2.3 I1, 2, 3, 4, 5, 6	 PM 2.1. Program Participants shall promptly reforest after final harvest. 11. Documented reforestation plans, including designation of all harvest areas for either natural, planted or direct seeded regeneration and prompt reforestation, unless delayed for site-specific environmental or forest health considerations or legal requirements, through planting within two years or two planting seasons, or by planned natural regeneration methods within five years. PM 2.3. Program Participants shall implement forest management practices to protect and maintain forest and soil productivity 12. Use of erosion control measures to minimize the loss of soil and site productivity. 13. Post-harvest conditions conducive to maintaining site productivity (e.g., limited rutting, retained down woody debris, minimized skid trails). 14. Retention of vigorous trees during partial harvesting, consistent with scientific silvicultural standards for the area. 15. Criteria that address harvesting and site preparation to protect soil productivity. 16. Road construction and skidding layout to minimize impacts to soil productivity. Conclusion - conforms

Question	YES / NO*	Reference to scheme documentation	
			The standard sets explicit requirements for prompt regeneration. The requirement to comply with legislation supports the regeneration obligation at least in public forests. General provisions to protect soils are in place.
5.3.6 Harvesting levels of both wood and non-wood forest products shall not exceed a rate that can be sustained in the long term, and optimum use shall be made of the harvested forest products, with due regard to nutrient off-take.	YES	O1 Forest management planning PM 1.1 I1, 2 O7 Efficient use of fiber resources Pm 7.1 I1	 PM 1.1. Program Participants shall ensure that forest management plans include long-term harvest levels that are sustainable and consistent with appropriate growth-and-yield models. I1 Forest management planning at a level appropriate to the size and scale of the operation including h. recommended sustainable harvest levels for areas available for harvest; i a review of non-wood issues (bioenergy feedstock production) I2. Documented current harvest trends fall within long-term sustainable levels identified in the forest management plan. PM 7.1. Program Participants shall employ appropriate forest harvesting technology and in-woods manufacturing processes and practices to minimize waste and ensure efficient utilization of harvested trees, where consistent with other SFI Standard objectives I1 Program or monitoring system to ensure efficient utilization, which may include provisions to ensure: a. management of <u>harvest residue</u> (e.g., slash, limbs, tops) considers economic, social and environmental factors (e.g., organic and nutrient value to future forests and the potential of increased fuels build-up) and other utilization needs; Conclusion - conforms The standard sets complying requirements

[©] Indufor Assessment of the Revised Sustainable Forestry Initiative (SFI) Programme Against PEFC Council Requirements – PEFC Council Checklist PEFC IGD 1007-01:2012., Final draft report, June 20, 2016. 67

Question	YES / NO*	Reference to scheme documentation	
5.3.7 Where it is the responsibility of the forest owner/manager and included in forest management, the exploitation of non-timber forest products, including hunting and fishing, shall be regulated, monitored and controlled.	YES	O1 Forest management planning PM 1.1 I1 O8 Indigenous peoples' rights O9 Legal and regulatory compliance	 PM 1.1 (see PEFC checklist question 5.3.6) I1 Forest management planning at a level appropriate to the size and scale of the operation including i a review of non-wood issues (bioenergy feedstock production) PM 5.4. Program Participants shall support and promote recreational opportunities for the public. I1. Provide recreational opportunities for the public, where consistent with forest management objectives. Note: Hunting and Fishing in the United States and Canada are controlled by Federal, provincial and state governments and regulated by numerous laws and regulations PM 6.1. Program Participants shall identify special sites and manage them in a manner appropriate for their unique features. I1. Use of information such as existing natural heritage data, expert advice or stakeholder consultation in identifying or selecting special sites for protection. Note: applies e.g. on valuable hunting and fishing sites for indigenous people. PM 9.1. Program Participants shall comply with applicable federal, provincial, state and local forestry and related social and environmental laws and regulations. I2. System to achieve compliance with applicable federal, provincial, state, or local laws and regulations. I3. Demonstration of commitment to legal compliance through available regulatory action information.

	YES /	Reference to scheme	
Question	NO*	documentation	
			 PM 8.2 Program Participants with forest management responsibilities on public lands shall confer with affected Indigenous Peoples with respect to sustainable forest management practices. c. address the use of non-timber forest products of value to Indigenous Peoples in areas where Program Participants have management responsibilities on public lands; Conclusion – conforms Forest management planning and implementation covers the production and use of non-timber forest products. Hunting and fishing is not specifically addressed because they are controlled through legislation. Indigenous people have special rights related to use of forests and forest products.
5.3.8 Adequate infrastructure such as roads, skid tracks or bridges shall be planned, established and maintained to ensure efficient delivery of goods and services while minimizing negative impacts on the environment.	YES	O3 Projection and maintenance of water resources PM 3.1 I1, 2, 3 PM 3.2 O2 PM 2.3 I6	 PM 3.1. Program Participants shall meet or exceed all applicable federal, provincial, state and local <u>water quality laws</u>, and meet or exceed <u>best</u> <u>management practices</u> developed under Canadian or U.S. Environmental Protection Agency–approved water quality programs. I1. Program to implement federal, state or provincial water quality best management practices during all phases of management activities. I2. Contract provisions that specify conformance to best management practices. I3. Monitoring of overall best management practices implementation. PM 2.3. Program Participants shall implement forest management practices to protect and maintain forest and soil productivity. I6. Road construction and skidding layout to minimize impacts to soil productivity. PM 3.2. Program Participants shall implement water, wetland and riparian protection measures based on soil type, terrain, vegetation, ecological function, harvesting system, state best management practices (BMPs), provincial guidelines and other applicable factors.

Question	YES / NO*	Reference to scheme documentation	
			 11. Program addressing management and protection of rivers, streams, lakes, wetlands, other water bodies and riparian areas during all phases of management, including the layout and construction of roads and skid trails to maintain water reach, flow and quality. 12. Mapping of rivers, streams, lakes, wetlands and other water bodies as specified in state or provincial best management practices and, where appropriate, identification on the ground. 13. Document and implement plans to manage and protect rivers, streams, lakes, wetlands, other water bodies and riparian areas. 14. Plans that address wet-weather events in order to maintain water quality (e.g., forest inventory systems, wet-weather tracts, definitions of acceptable operating conditions). Water protection legislation and mandatory Best Management Practices (BMP) regulate the infrastructure development in forests in the US and Canada. Adequate road network with appropriate bridges, culverts, etc.is defined in BMPs. Compliance with mandatory BMPs including the quantity and the quality of this infrastructure is assessed in annual audits. Conclusion - conforms
Criterion 4: Maintenance, conservation and appropriate enhance	ment of bio	ological diversity in fore	st ecosystems
		O1 Forest management planning	PM 1.1. Program Participants shall ensure that forest management plans include long-term harvest levels that are sustainable and consistent with appropriate growth-and-yield models.
5.4.1 Forest management planning shall aim to maintain, conserve and enhance biodiversity on ecosystem, species and genetic levels and, where appropriate, diversity at landscape level.	YES	PM 1.1	I1 Forest management planning at a level appropriate to the size and scale of the operation including
		O4 Conservation of	c. a land classification system;
		biological diversity	d. biodiversity at landscape scales;
		PM 4.1	PM 4.1. Program Participants shall conserve biological diversity.

Question	YES / NO*	Reference to scheme documentation	
		11, 2, 3, 4, 5, 6	 11. <u>Program</u> to incorporate the conservation of native biological diversity, including species, wildlife habitats and ecological community types at stand and landscape levels. 12. Development of <u>criteria</u> and implementation of practices, as guided by regionally based best scientific information, to retain stand-level wildlife habitat elements such as snags, stumps, mast trees, down woody debris, den trees and nest trees. 13. <u>Document diversity</u> of forest cover types and age or size classes at the individual ownership or forest tenure level, and where credible data are available, at the landscape scale. Working individually or collaboratively to support diversity of native forest cover types and age or size classes that enhance biological diversity at the landscape scale. 14. Program Participants shall participate in or <u>incorporate</u> the <u>results</u> of state, provincial, or regional conservation <u>planning</u> and <u>priority-setting</u> efforts to conserve biological diversity and consider these efforts in forest management planning. Examples of credible priority-setting efforts include state wildlife action plans, state forest action plans, relevant habitat conservation plans or provincial wildlife recovery plans. 15. <u>Program to address conservation of known sites</u> with viable occurrences of significant species of concern. 16. <u>Identification and protection of non-forested wetlands</u>, including bogs, fens and marshes, and vernal pools of ecological significance. Conclusion - conforms The standard requires as appropriate the consideration of biodiversity values in planning
5.4.2 Forest management planning, inventory and mapping of forest resources shall identify, protect and/or conserve ecologically important forest areas containing significant concentrations of:		O1 Forest management planning	PM 1.1 forest management plans includeI1 Forest management planning at a level appropriate to the size and scale of the operation including
 a) protected, rare, sensitive or representative forest ecosystems such as riparian areas and wetland biotopes; 	YES	PM 1.1	c. a land classification system;
 areas containing endemic species and habitats of threatened species, as defined in recognized reference lists; 			d. biodiversity at landscape scales;

Question	YES / NO*	Reference to scheme documentation	
 c) endangered or protected genetic <i>in situ</i> resources; and taking into account d) Globally, regionally and nationally significant large landscape areas with natural distribution and abundance of naturally occurring species. 		O4 Conservation of biological diversity PM 4.2 I1, 2, 3	 PM 4.2. Program Participants shall protect threatened and endangered species, Forests with Exceptional Conservation Values (FECV) and old growth forests. I1. Program to protect threatened and endangered species. I2. Program to locate and protect known sites flora and fauna associated with viable occurrences of critically imperiled and imperiled species and communities also known as Forests with Exceptional Conservation Value. I3. Support of and participation in plans or programs for the conservation of old-growth forests in the region of ownership or forest tenure. Conclusion - conforms The standard requires as appropriate the consideration of important areas in forest management planning
5.4.3 Protected and endangered plant and animal species shall not be exploited for commercial purposes. Where necessary, measures shall be taken for their protection and, where relevant, to increase their population.	YES	O4 O4 Conservation of biological diversity PM 4.2 I1, 2, 3 PM 4.3 I 1 PM 4.4 I1 O9 Legal and regulatory compliance PM 9.1 I1, 2, 3	 PM 4.2. (see PEFC Checklist question 5.4.2) PM 4.3. Program Participants shall <u>manage</u> ecologically important sites in a <u>manner that takes into account their unique qualities</u>. 11. Use of information such as existing natural heritage data or expert advice in identifying or selecting ecologically important sites for protection. 12. Appropriate mapping, cataloging and management of identified ecologically important sites. PM 4.4. Program Participants shall <u>apply knowledge gained through research</u>, science, technology and field experience to manage wildlife habitat and contribute to the conservation of biological diversity. 11. Collection of information on Forests with Exceptional Conservation Value and other biodiversity-related data through <u>forest inventory</u> processes, mapping or <u>participation in external programs</u>, such as

Question	YES / NO*	Reference to scheme documentation	
			NatureServe, state or provincial heritage programs, or other credible systems.
			 PM 9.1. Program Participants shall comply with applicable federal, provincial, state and local forestry and related social and environmental laws and regulations. Indicators: Access to relevant laws and regulations in appropriate locations. System to achieve compliance with applicable federal, provincial, state, or local laws and regulations. Demonstration of commitment to legal compliance through available regulatory action information. This requirement addresses compliance with CITES. Compliance - conforms Law in Canada and the US protects threatened and endangered species where SFI is applied. The standard requires identification and protection of these species and legislation prohibits their exploitation for commercial purposes
5.4.4 Forest management shall ensure successful regeneration through natural regeneration or, where not appropriate, planting that is adequate to ensure the quantity and quality of the forest resources.	YES	O2 Forest health and productivity PM 2.1 I1, 2, 4, 5	 PM 2.1. Program Participants shall promptly reforest after final harvest. I1. Documented reforestation plans, including designation of all harvest areas for either natural, planted or direct seeded regeneration and prompt reforestation, unless delayed for site-specific environmental or forest health considerations or legal requirements, through planting within two years or two planting seasons, or by planned natural regeneration methods within five years. I2. Clear criteria to judge adequate regeneration and appropriate actions to correct understocked areas, achieve acceptable species composition, and stocking rates for planting, direct seeding and natural regeneration. I4. Protection of desirable or planned advanced natural regeneration during harvest.

[©] Indufor Assessment of the Revised Sustainable Forestry Initiative (SFI) Programme Against PEFC Council Requirements – PEFC Council Checklist PEFC IGD 1007-01:2012., 73

Question	YES / NO*	Reference to scheme documentation	
5.4.5 For reforestation and afforestation, origins of native species and local provenances that are well adapted to site conditions shall be preferred, where appropriate. Only those introduced species, provenances or varieties shall be used whose impacts on the ecosystem and on the genetic integrity of native species and local provenances have been evaluated, and if negative impacts can be avoided or minimized.	YES	O2 Forest health and productivity PM 2.1 I3 PM 2.5 I1 O1 Forest management planning PM 1.2 I2	 15. Afforestation programs that consider potential ecological impacts of the selection and planting of tree species in non-forested landscapes Conclusion - conforms The standard sets appropriate requirements for regeneration PM 2.1. Program Participants shall promptly reforest after final harvest. 13 Plantings of exotic tree species should minimize risk to native ecosystems PM 1.2. Program Participants shall not convert one forest cover type to another forest cover type, unless in justified circumstances. 12. Where a Program Participant intends to convert to another forest cover type, an assessment considers: a. Productivity and stand quality conditions and impacts which may include social and economic values; b. Specific ecosystem issues related to the site such as invasive species, insect or disease issues, riparian protection needs and others as appropriate to the site including regeneration challenges; and c. Ecological impacts of the conversion including a review at the site and landscape scale as well as consideration for any appropriate mitigation measures. PM 2.5. Program Participants that deploy improved planting stock, including varietal seedlings, shall use best scientific methods. 11. Program for appropriate research, testing, evaluation and deployment of improved planting stock, including varietal seedlings For public forests there are state/provincial legal requirements regarding seed provenance and restriction of the deployment of exotics species. In private forests the forest owner makes the decision within the limits provided by legislation and the SFI standard.

Question	YES / NO*	Reference to scheme documentation	
			 PM 2.4 requires protection of forests form invasive exotic species and PM 9.1 require legal compliance. Note: as per the SFI definition of exotic species that have become naturalized and are naturally reproducing are not exotic. Conclusion - conforms
5.4.6 Afforestation and reforestation activities that contribute to the improvement and restoration of ecological connectivity shall be promoted.	YES	O1 Forest management planning PM 1.1 O2 Forest health and productivity PM 2.1 I5	 PM 1.1 Program Participants shall ensure that forest management plans include long-term harvest levels I1 Forest management planning including: d biodiversity at landscape scales PM 2.1. Program Participants shall promptly reforest after final harvest. I5 Afforestation programs that consider potential ecological impacts of the selection and planting of tree species in non-forested landscapes. Performance Measure 4.1. Program Participants shall conserve biological diversity I3. Document diversity of forest cover types and age or size classes at the individual ownership or forest tenure level, and where credible data are available, at the landscape scale. Working individually or collaboratively to support diversity of native forest cover types and age or size classes that enhance biological diversity at the landscape scale. Conclusion - conforms
5.4.7 Genetically-modified trees shall not be used.	YES	O10 Forest research, science, technology PM 10.1 I2	 SFI Policy on Forest Tree Biotechnology – Section 7 of SFI 2015–2019 Standards and Rules C. SFI Inc. realizes that much research is still being conducted to study the ecological cost benefits of genetically engineered trees and regulations concerning forest biotechnology continue to evolve. As such

Question	YES / NO*	Reference to scheme documentation	
		Section 7 SFI Policy on Forest Tree Biotechnology	 research and regulations develop; SFI Inc. will review to understand the impacts of genetically engineered trees from an ecological perspective. D. SFI Inc. is endorsed by the Program for the Endorsement of Forest Certification (www.pefc.org), which has restrictions on the use of genetically engineered trees until December 31, 2015: Genetically-modified trees shall not be used. PM 10.1. Program Participants shallinvolving SFI Implementation Committees,provide in-kind support or funding for forest I2. Research on genetically engineered trees via forest tree biotechnology shall adhere to <u>all applicable federal, state, and provincial regulations</u> and international protocols ratified by the United States and/or Canada depending on jurisdiction of management. Legal compliance PM 9.1 is naturally the bottom line. Conclusion – conforms SFI is committed to comply with PEFC rules on the use of GMO trees, the rules prohibit their use by certified entity. The US legislation strictly controls the research, testing and commercial cultivation of GMO trees. SFI does not prohibit research on the sector.
5.4.8 Forest management practices shall, where appropriate, promote a diversity of both horizontal and vertical structures such as uneven-aged stands and the diversity of species such as mixed stands. Where appropriate, the practices shall also aim to maintain and restore landscape diversity.	YES	O1 Forest management planning PM 1.1 I1 PM 1.2 I5	 PM 1.1 Program Participants shall ensure that forest management plans include long-term harvest levels I1 Forest management planning including: d biodiversity at landscape scales Performance Measure 1.2. Program Participants shall not convert one forest cover type to another forest cover type, unless in justified circumstances. I5. Program Participants shall not convert one forest cover type, unless the conversion:

Question	YES / NO*	Reference to scheme documentation	
		O4 Conservation of biological diversity PM 4.1 I1, I3 O2 Forest health PM 2.3 I4	 b. <u>Would not convert native forest types that are rare and ecologically significant at the landscape level</u> or put any native forest types at risk of becoming rare; and c. <u>Does not create significant long-term adverse impacts on Forests with Exceptional Conservation Value</u>, old-growth forests, forests critical to threatened and endangered species, and special sites PM 4.1. Program Participants shall conserve biological diversity. <u>I1 Program</u> to incorporate the <u>conservation of native biological diversity</u>, including species, wildlife habitats and ecological community types at <u>stand and landscape levels</u>. I3 3. Document diversity of forest cover types and age or size classes at the individual ownership or forest tenure level, and where credible data are available, at the landscape scale. Working individually or collaboratively to support diversity of native forest cover types and age or size classes that enhance biological diversity at the landscape scale. PM 2.3. Program Participants shall implement forest management practices to protect and maintain forest and soil productivity. 14. Retention of vigorous trees during partial harvesting, consistent with scientific silvicultural standards for the area. SFI's approach to enhancement of diverse forest structure is based on protection of valuable sites and areas at stand and landscape levels. Provisions for water protection require buffer zones that are defined in detail in mandatory Best Management Practices approved by authorities at state/province or municipal levels. In addition, the SFI standard requires leaving of retention trees and promotion of mixed stand structure wherever appropriate (e.g. naturally regenerated forests and broadleaved forests). Conclusion - conforms

Question	YES / NO*	Reference to scheme documentation	
5.4.9 Traditional management systems that have created valuable ecosystems, such as coppice, on appropriate sites shall be supported, when economically feasible.	YES	O1 Forest management planning PM 1.2 O4 Conservation of biological diversity PM 4.1 I1 O8 Recognize and Respect Indigenous Peoples' Rights PM3 I1, I2	 PM 1.2. Program Participants shall not convert one forest cover type to another forest cover type, unless in justified circumstances. I1.Program Participants shall not convert one forest cover type to another forest cover type, unless the conversion: e. Would not convert native forest types that are rare and ecologically significant at the landscape level or put any native forest types at risk of becoming rare PM 4.1. Program Participants shall conserve biological diversity. 11. <u>Program</u> to incorporate the conservation of native biological diversity, including species, wildlife habitats and <u>ecological community types</u> at stand and landscape levels. PM 8.3. Program Participants are encouraged to communicate with and shall respond to local Indigenous Peoples with respect to sustainable forest management practices on their private lands. 11. Program Participants are aware of traditional forest-related knowledge, such as known cultural heritage sites, the use of wood in traditional buildings and crafts, and flora that may be used in cultural practices for food, ceremonies or medicine. 12. Respond to Indigenous Peoples' inquiries and concerns received. Conclusion- conforms The standard prohibits conversion of important sites (e.g. valuable ecosystems) to other forest types and it requires a program to protect valuable ecological community types. In addition, the indigenous people shall have the right to conserve traditional ways to use forests.
5.4.10 Tending and harvesting operations shall be conducted in a way that does not cause lasting damage to ecosystems. Wherever	YES	O2 Forest health and productivity	PM 2.1. Program Participants shall promptly reforest after final harvest. /4. Protection of desirable or planned advanced natural regeneration during harvest

Question	YES / NO*	Reference to scheme documentation	
possible, practical measures shall be taken to improve or maintain biological diversity.		PM 2.1 PM 2.3 O3 Protection and maintenance of water resources PM 3.1 I1, 2, 3 O5 Management of Visual Quality and Recreational Benefits PM 5.2 I1 PM 5.3 I1, 2, 3	 PM 3.1. Program Participants shall meet or exceed all applicablewater quality laws, and meet or exceed best management practices developed under Canadian or U.S. Environmental Protection Agency–approved water quality programs. 11. Program to implement federal, state or provincial water quality best management practices during all phases of management activities. 12. Contract provisions that specify conformance to best management practices. 13. Monitoring of overall best management practices implementation. PM 2.3 Program Participants shall implement practices to protect and main forest and soil productivity 11. Process to identify soils vulnerable to compaction, and use of appropriate methods, including the use of soil maps where available, to avoid excessive soil disturbance. 12. Use of erosion control measures to minimize the loss of soil and site productivity. 13. Post-harvest conditions conducive to maintaining site productivity (e.g., limited rutting, retained down woody debris, minimized skid trails). 14. <u>Retention of vigorous trees</u> during partial harvesting, consistent with scientific silvicultural standards for the area. PM 5.2. Program Participants shall manage the size, shape and placement of clear-cut harvest areas does not exceed 50 ha, except when necessary to meet regulatory requirements, achieve ecological objectives or to respond to forest health emergencies or other natural catastrophes. PM 5.3. Program Participants shall adopt a green-up requirement or alternative methods. 13. Trees in clear-cut harvest areas are at least 3 years old or 5 feet (1.5 meters) high at the desired level of stocking before adjacent areas are clear-cut, or as appropriate to address operational and economic considerations, alternative methods to reach the performance measure are utilized by the Program Participant.

Question	YES / NO*	Reference to scheme documentation	
		O2 Forest health and productivity	Conclusion - conforms The standard address avoidance of damages on young plant material, on soil and waters and slight restrictions on clear-cut areas. <i>PM 2.3 Program Participants shall implement practices to protect and main forest and soil productivity 12. Use of erosion control measures to minimize the loss of soil and site productivity 16 Road construction and skidding layout to minimize impacts to <u>soil</u></i>
5.4.11 Infrastructure shall be planned and constructed in a way that minimizes damage to ecosystems, especially to rare, sensitive or representative ecosystems and genetic reserves, and that takes threatened or other key species – in particular their migration patterns – into consideration.	YES	PM 2.3 I2, 6 O3 Protection and maintenance of water resources PM 3.2 I1	 productivity PM 3.2. Program Participants shall implement water, wetland and riparian protection measures 11. Program addressing management and protection of rivers, streams, lakes, wetlands, other water bodies and riparian areas during <u>all phases</u> of management, including the <u>layout and construction of roads and skid</u> trails to maintain water reach, flow and quality. Water protection legislation requires compliance with mandatory Best Management Practices that set detailed provisions to the quality of infrastructure development in view of soil and water protection. Conclusion - conforms
5.4.12 With due regard to management objectives, measures shall be taken to balance the pressure of animal populations and grazing on forest regeneration and growth as well as on biodiversity.	YES	O2 Forest health and productivity PM 2.4 I1	 PM 2.4. Program Participants shall manage to protect forests from damaging agents,invasiveanimals, to maintain and improve long-term forest health, productivity and economic viability. I1. Program to protect forests from damaging agents. Restoration of wildlife increases browsing pressure on some areas. Forest managers, however, do not have the mandate to make decisions related to the control of wildlife populations. Measures to adapt forest management and to protect seedlings from browsing are taken whenever feasible.

Question	YES / NO*	Reference to scheme documentation	
		O4 Conservation of	Conclusion – conforms PM 4.1. Program Participants shall conserve biological diversity.
5.4.13 Standing and fallen dead wood, hollow trees, old groves and special rare tree species shall be left in quantities and distribution necessary to safeguard biological diversity, taking into account the potential effect on the health and stability of forests and on surrounding ecosystems.	YES	biological diversity PM 4.1 I2	 I2. Development of criteria and implementation of practices, as guided by regionally based best scientific information, to retain stand-level wildlife habitat elements such as snags, stumps, mast trees, down woody debris, den trees and nest trees. Conclusion – conforms
Criterion 5: Maintenance and appropriate enhancement of protect	ctive functi	ons in forest manageme	ent
5.5.1 Forest management planning shall aim to maintain and enhance protective functions of forests for society, such as protection of infrastructure, protection from soil erosion, protection of water resources and from adverse impacts of water such as floods or avalanches.	YES	O2 Forest health and productivity PM 2.3 I1 PM 2.4 I1, 2	 PM 2.3 Program Participants shall implement practices to protect and main forest and soil productivity I1 Process to identify soils vulnerable to compaction, and use of appropriate methods, including the use of soil maps where available, to avoid excessive soil disturbance PM 2.4. Program Participants shall manage to protect forests from damaging agents, such as environmentally or economically undesirable wildfire, pests, diseases and invasive exotic plants and animals, to maintain and improve long-term forest health, productivity and economic viability. 1. Program to protect forests from damaging agents. 2. Management to promote healthy and productive forest conditions to minimize susceptibility to damaging agents. PM 3.2. Program Participants shall implement water; wetland and riparian protection measures based on soil type, terrain, vegetation, ecological function, harvesting system, and state best management practices (BMPs), provincial guidelines and other applicable factors. I1. Program addressing management and protection I2. Mapping of rivers, streams, lakes, wetlands and other water bodies as specified in state or provincial best management practices and, where appropriate, identification on the ground. I3. Document and implement plans to manage and protect rivers, streams, lakes, wetlands, other water bodies and riparian areas.

Question	YES / NO*	Reference to scheme documentation	
			 <i>Plans that address wet-weather events</i> in order to maintain water quality (e.g., forest inventory systems, wet-weather tracts, definitions of acceptable operating conditions). Conclusion– conforms The standard requires compliance with the best management practices BMP's on soil and water protection.
5.5.2 Areas that fulfil specific and recognized protective functions for society shall be registered and mapped, and forest management plans or their equivalents shall consider these areas.	YES	O1 PM 1.1 I1 O3 PM 3.2 I1,2,3,4	 PM 1.1. Program Participants shall ensure that forest management plans include long-term harvest levels that are sustainable and consistent with appropriate growth-and-yield models. I1. Forest management planning at a level appropriate to the size and scale of the operation, including: c. a land classification system; PM 3.2 (see PEFC Checklist question 5.5.1) Conclusion – conforms
5.5.3 Special care shall be given to silvicultural operations on sensitive soils and erosion-prone areas where operations might lead to excessive erosion of soil into watercourses. Inappropriate techniques such as deep soil tillage and use of unsuitable machinery shall be avoided in such areas. Special measures shall be taken to minimize the pressure of animal populations.	YES	O2 Forest health and productivity PM 2.3 I2,3,6 PM2.4 I1,2 O3 Protection and maintenance of water resources PM 3.2 I1, I2, I3, I4	 PM 2.3. Program Participants shall implement forest management practices to protect and maintain forest and soil productivity. I2. Use of erosion control measures to minimize the loss of soil and site productivity. I3. Post-harvest conditions conducive to maintaining site productivity (e.g., limited rutting, retained down woody debris, minimized skid trails). I6. Road construction and skidding layout to minimize impacts to soil productivity. PM 2.4. Program Participants shall manage to protect forests from damaging agents, such as environmentally or economically undesirable wildfire, pests, diseases and invasive exotic plants and animals, to

Question	YES / NO*	Reference to scheme documentation	
			maintain and improve long-term forest health, productivity and economic viability.
			11. Program to protect forests from damaging agents.
			I2. Management to promote healthy and productive forest conditions to minimize susceptibility to damaging agents.
			PM 3.2. Program Participants shall implement water, wetland and riparian protection measures based on soil type, terrain, vegetation, ecological function, harvesting system, state best management practices (BMPs), provincial guidelines and other applicable factors.
			I1. <u>Program addressing management and protection of rivers, streams,</u> lakes, wetlands, other water bodies and riparian areas during all phases of management, including the layout and construction of roads and skid trails to maintain water reach, flow and quality.
			I2. Mapping of rivers, streams, lakes, wetlands and other water bodies as specified in state or provincial best management practices and, where appropriate, identification on the ground.
			13. <u>Documentation and implementation of plans to manage and protect</u> rivers, streams, lakes, wetlands, other water bodies and riparian areas.
			14. <u>Plans that address wet-weather events</u> in order to maintain water quality (e.g., forest inventory systems, wet-weather tracts, definitions of acceptable operating conditions).
			Mandatory Best Management Practices developed at state/province and/or municipal levels set operational level rules for water and soil protection.
			The allowed large clear cut areas (50 ha) may increase the erosion risk during the first decade after harvesting. The standard requires planning of

[©] Indufor Assessment of the Revised Sustainable Forestry Initiative (SFI) Programme Against PEFC Council Requirements – PEFC Council Checklist PEFC IGD 1007-01:2012., Final draft report, June 20, 2016. 83

Question	YES / NO*	Reference to scheme documentation	
5.5.4 Special care shall be given to forest management practices in forest areas with water protection functions to avoid adverse effects on the quality and quantity of water resources. Inappropriate use of chemicals or other harmful substances or inappropriate silvicultural practices influencing water quality in a harmful way shall be avoided.	YES	O2 Forest health and productivity PM 2.2 I1, 6, 7 PM 3.1 I1, 2,3 PM 3.2 I1, 2, 3	Clearcut areas in a way that ensures high visual quality and green tree cover at a landscape level (PM 5.3). Conclusion - conforms PM 2.2. Program Participants shall minimize chemical use required to achieve management objectives while protecting employees, neighbors, the public and the environment, including wildlife and aquatic habitats. 11 Minimized chemical use required to achieve management objectives 16. Use of integrated pest management where feasible. 17. Supervision of forest chemical applications by state- or provincial-trained or certified applicators. PM 3.1. Program Participants 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. 11. Program to implement federal, state or provincial water quality best management practices during all phases of management activities. 12. Contract provisions that specify conformance to best management practices. 13. Monitoring of overall best management practices implementation. PM 3.2. Program Participants shall implement water; wetland and riparian protection measures based on soil type, terrain, vegetation, ecological function, harvesting system, state best management practices
			(BMPs), provincial guidelines and other applicable factors. 11. <u>Program</u> addressing <u>management and protection of rivers,</u> <u>streams, lakes, wetlands, other water bodies and riparian areas</u> during all phases of management, including the layout and

Question	YES / NO*	Reference to scheme documentation	
			 construction of roads and skid trails to maintain water reach, flow and quality. <i>I2.</i> <u>Mapping</u> of rivers, streams, lakes, wetlands and other water bodies as specified in state or provincial best management practices and, where appropriate, identification on the ground. <i>I3.</i> <u>Document and implement plans</u> to manage and protect rivers, streams, lakes, wetlands, other water bodies and riparian areas. Conclusion - conforms The standard sets procedural requirements to protect water and wetland management. Performance level in protection and use of chemicals is defined by legislation and best management practices.
5.5.5 Construction of roads, bridges and other infrastructure shall be carried out in a manner that minimizes bare soil exposure, avoids the introduction of soil into watercourses and preserves the natural level and function of watercourses and riverbeds. Proper road drainage facilities shall be installed and maintained.	YES	O2 Forest health and productivity PM 2.3 I6	 PM 2.3. Program Participants shall implement forest management practices to protect and maintain forest and soil productivity. I6 Road construction and skidding layout to minimize impacts to soil productivity PM 3.1. Program Participants 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. I1. Program to implement federal, state or provincial water quality best management practices during all phases of management activities. Contract provisions that specify conformance to best management practices. PM 3.2. Program Participants shall implement water, wetland and riparian protection measures based onstate best management practices (BMPs), provincial guidelines and other applicable factors.

Question	YES / NO*	Reference to scheme documentation	
			 I1. Program addressing management and protection of rivers, streams, lakes, wetlands, other water bodies and riparian areas during all phases of management, including the layout and construction of roads and skid trails to maintain water reach, flow and quality. Conclusion - conforms The standard sets procedural baseline requirement for road construction. Performance level requirements are defined by the legislation and best management practices.
Criterion 6: Maintenance of other socio-economic functions and	conditions	5	
5.6.1 Forest management planning shall aim to respect the multiple functions of forests to society, give due regard to the role of forestry in rural development, and especially consider new opportunities for employment in connection with the socio-economic functions of forests.	YES	O1 Forest management planning PM 1.1 I1 O7 Efficient use of fibre sources PM 7.1 I1 O11 Training and education PM 11.2 I1, I3	 PM 1.1. Program Participants shall ensure that forest management plans include long-term harvest levels I1. Forest management planning at a level appropriate to the size and scale of the operation, including: i a review of non-timber issues (e.g., recreation, tourism, pilot projects and economic incentive programs to promote water protection, carbon storage, bioenergy feedstock production, or biological diversity conservation or to address climate-induced ecosystem change). PM 7.1. Program Participants shall employ appropriate forest harvesting technology, in woods manufacturing processes and practices to minimize waste, and ensure efficient utilization of harvested trees, where consistent with other SFI Standard objectives. I1. Program or monitoring system to ensure efficient utilization, which may include provisions to ensure: b. training or incentives to encourage loggers to enhance utilization; c. exploration of markets for underutilized species and low-grade wood and alternative markets (e.g., bioenergy markets);

Question	YES / NO*	Reference to scheme documentation	
			 PM 11.2 Program Participants shall work — individually and/or with SFI Implementation Committees, logging or forestry associations, or appropriate agencies or others in the forestry community — to foster improvement in the professionalism of wood producers. 1. Participation in or support of SFI Implementation Committees to establish criteria and identify delivery mechanisms for wood producer training courses and periodic continuing education I.3. Participation in or support of SFI Implementation Committees to establish criteria for recognition of logger certification programs. SFI requires participation in regional level Standard Implementation Committees (SIC) that increase awareness on sustainable management and organize training for contractors and loggers. Conclusion – conforms
5.6.2 Forest management shall promote the long-term health and well-being of communities within or adjacent to the forest management area.	YES	O7 Efficient use of Fiber resources O12 Community involvement and landowner outreach PM 12.2 I1 PM 12.3 I1,2	 See PM1.1 in PEFC Checklist question 5.6.1. PM 7.1. Program Participants shall employ appropriate forest harvesting technology, in woods manufacturing processes and practices to minimize waste, and ensure efficient utilization of harvested trees, where consistent with other SFI Standard objectives. Indicator: Program or monitoring system to ensure efficient utilization, which may include provisions to ensure: training or incentives to encourage loggers to enhance utilization; exploration of markets for underutilized species and low-grade wood and alternative markets (e.g., bioenergy markets); PM 11.1 also address competence development in logging operations PM 12.2. Program Participants shall support and promote, at the state, provincial or other appropriate levels, mechanisms for public outreach, education and involvement related to sustainable forest management.

[©] Indufor Assessment of the Revised Sustainable Forestry Initiative (SFI) Programme Against PEFC Council Requirements – PEFC Council Checklist PEFC IGD 1007-01:2012., Final draft report, June 20, 2016. 87

Question	YES / NO*	Reference to scheme documentation	
			11. Periodic educational opportunities promoting sustainable forestry, such as
			a. field tours, seminars, websites, webinars or workshops;
			b. educational trips;
			c. self-guided forest management trails;
			d. publication of articles, educational pamphlets or newsletters; or
			e. support for state, provincial, and local forestry organizations and soil and water conservation districts.
			PM 12.3. Program Participants shall establish, at the state, provincial, or other appropriate levels, procedures to address concerns raised by loggers, consulting foresters, employees, unions, the public or other Program Participants regarding practices that appear inconsistent with the SFI Standard principles and objectives.
			 Support for SFI Implementation Committees (e.g., toll-free numbers and other efforts) to address concerns about apparent nonconforming practices.
			I2. Process to receive and respond to public inquiries. SFI Implementation Committees shall submit data annually to SFI Inc. regarding concerns received and responses.
			Conclusion - Conforms
5.6.3 Property rights and land tenure arrangements shall be clearly defined, documented and established for the relevant forest area. Likewise, legal, customary and traditional rights related to the	O9 Legal and regulatory compliance O8 Recognize and	PM 9.1 Program Participants shall comply with applicable federal, provincial, state and local forestry and related social and environmental laws and regulations	
forestland shall be clarified, recognized and respected.		respect Indigenous Peoples' Rights PM 8.1	PM 13.1. Program Participants with forest management responsibilities on public lands shall participate in the development of public land planning and management processes.

Question	YES / NO*	Reference to scheme documentation	
		PM 8.3 O13 Public land management responsibilities PM 13.1 I 2,	 11. Involvement in public land planning and management activities with appropriate governmental entities and the public. 12. Appropriate contact with local stakeholders over forest management issues through state, provincial, federal or independent collaboration. PM 8.1. Program Participants shall recognize and respect Indigenous Peoples' rights. 11. Program Participants will provide a written policy acknowledging a commitment to recognize and respect the rights of Indigenous Peoples. PM 8.3. Program Participants are encouraged to communicate with and shall respond to local Indigenous Peoples with respect to sustainable forest management practices on their private lands. 12. Respond to Indigenous Peoples' inquiries and concerns received. Conclusion – conforms Property rights are well-defined, protected by legislation and enforced as appropriate. This also applies to the rights of indigenous communities.
5.6.4 Forest management activities shall be conducted in recognition of the established framework of legal, customary and traditional rights such as outlined in ILO 169 and the UN Declaration on the Rights of Indigenous Peoples, which shall not be infringed upon without the free, prior and informed consent of the holders of the rights, including the provision of compensation where applicable. Where the extent of rights is not yet resolved or is in dispute there are processes for just and fair resolution. In such cases forest managers shall, in the interim, provide meaningful opportunities for parties to be engaged in forest management decisions whilst respecting the processes and roles and responsibilities laid out in the policies and laws where the certification takes place.	YES	O8 Recognize and respect Indigenous Peoples' rights PM 8.1 I1, PM 8.2 I1 PM 8.3 I1, 2	The SFI 2015–2019 Forest Management Standard recognizes and adopts the <u>principles outlined in the United Nations Declaration for the</u> <u>Rights of Indigenous Peoples (UNDRIP)</u> . The Declaration says that consideration should be given for Indigenous Peoples' rights to <u>maintain</u> and strengthen their distinct spiritual relationship with their traditionally <u>owned or otherwise used lands and territories</u> . In adopting the UNDRIP articles SFI Program Participants <u>are encouraged to communicate and</u> <u>collaborate with local Indigenous Peoples</u> in order to better understand their traditional practices and experiences with respect to forest management. Both <u>Canada and the United States officially endorsed UNDRIP in 2010</u> . Article 25 of UNDRIP states that, "Indigenous peoples have the right to maintain and strengthen their distinctive spiritual relationship with their traditionally owned or otherwise occupied and used lands, territories, waters and coastal seas and other resources and to uphold their responsibilities to future generations in this regard

Question	YES / NO*	Reference to scheme documentation	
			PM 8.1. Program Participants shall recognize and respect Indigenous Peoples' rights.
			11. Program Participants will provide a <u>written policy acknowledging a</u> <u>commitment to recognize and respect the rights of Indigenous Peoples</u> .
			PM 8.2. Program Participants with forest management <u>responsibilities on</u> <u>public lands shall confer with affected Indigenous Peoples</u> with respect to sustainable forest management practices.
			I1. Program that includes communicating with affected Indigenous Peoples to enable Program Participants to:
			a. understand and respect traditional forest-related knowledge;
			b. identify and protect spiritually, historically, or culturally important sites;
			c. address the use of non-timber forest products of value to Indigenous Peoples in areas where Program Participants have management responsibilities on public lands; and
			d. respond to Indigenous Peoples' inquiries and concerns received.
			PM 8.3. Program Participants are encouraged to <u>communicate with and</u> <u>shall respond to local Indigenous Peoples</u> with respect to sustainable forest management practices <u>on their private lands</u> .
			11. Program Participants are aware of traditional forest-related knowledge, such as known cultural heritage sites, the use of wood in traditional buildings and crafts, and flora that may be used in cultural practices for food, ceremonies or medicine.
			12. Respond to Indigenous Peoples' inquiries and concerns received.
			Conclusion - conforms

[©] Indufor Assessment of the Revised Sustainable Forestry Initiative (SFI) Programme Against PEFC Council Requirements – PEFC Council Checklist PEFC IGD 1007-01:2012., Final draft report, June 20, 2016. 90

Question	YES / NO*	Reference to scheme documentation	
			The US and Canada have well-developed legislation to protect the rights of indigenous people. By law public forestry at a state/provincial level is mostly responsible forn ensuring that the interests of indigenous communities are fully taken into consideration in forest management. The principle of Free Prior Informed Consent (FPIC) is respected as appropriate through legislation. SFI standards specify the responsibilities at a FMU level. Canada and the US have ratified the UN Declaration on the Rights of Indigenous People (UNDRIP 2007) that, however, is not legally binding and is subject to supervisory or regular monitoring. ILO 169 Convention, that would be legally binding and subject to annual monitoring is not ratified. On the other hand, the scope of Declaration is broad and has relevance to ILO instruments beyond the Convention 169. http://www.ilo.org/wcmsp5/groups/public/@ed_norm/@normes/document s/publication/wcms_100792.pdf
5.6.5 Adequate public access to forests for the purpose of recreation shall be provided taking into account respect for ownership rights and the rights of others, the effects on forest resources and ecosystems, as well as compatibility with other functions of the forest.	YES	O1 Forest management planning PM 1.1 I1 O5 Management of visual quality and recreational benefits PM 5.4 I1	 PM 1.1. Program Participants shall ensure that forest management plans include long-term harvest levels I1. Forest management planning at a level appropriate to the size and scale of the operation, including: <i>i</i> a <u>review</u> of non-timber issues (e.g., <u>recreation</u>, tourism, or biological diversity conservation, or to address climate-induced ecosystem change). PM 5.4. Program Participants shall support and promote recreational opportunities for the public. I1. <u>Provide recreational opportunities for the public</u>, where consistent with forest management objectives Conclusion - conforms The standard obliges to provide recreational opportunities on private and public lands. SFI follows up on the share of certified forests accessible

Question	YES / NO*	Reference to scheme documentation	
			fully or partly for recreation and in 2015 97% of the forests were used for different outdoor activities.
			PM 6.1. Program Participants shall identify special sites and manage them in a manner appropriate for their unique features.
			11. Use of information such as existing natural <u>heritage</u> data, expert advice or stakeholder consultation in identifying or selecting special sites for protection.
			<i>I2. Appropriate mapping, cataloging and management of identified special sites.</i>
	YES	O6 Protection of special sites	PM 4.3. Program Participants shall manage ecologically important sites in a manner that takes into account their unique qualities.
5.6.6 Sites with recognized specific historical, cultural or spiritual significance and areas fundamental to meeting the basic needs of		O4 Conservation of biological diversity	11. Use of information such as existing natural heritage data or expert advice in identifying or selecting ecologically important sites for
local communities (e.g. health, subsistence) shall be protected or		08 Recognize and	protection.
managed in a way that takes due regard of the significance of the site.		respect Indigenous Peoples' rights	2. Appropriate mapping, cataloging and management of identified ecologically important sites.
			PM 8.3. Program Participants are encouraged to communicate with and shall respond to local Indigenous Peoples with respect to sustainable forest management practices on their private lands.
			11. Program Participants are aware of traditional forest-related knowledge, such as known cultural heritage sites, the use of wood in traditional buildings and crafts, and flora that may be used in cultural practices for food, ceremonies or medicine.
			I2. Respond to Indigenous Peoples' inquiries and concerns received.
			Conclusion – conforms

[©] Indufor Assessment of the Revised Sustainable Forestry Initiative (SFI) Programme Against PEFC Council Requirements – PEFC Council Checklist PEFC IGD 1007-01:2012., 92

Question	YES / NO*	Reference to scheme documentation	
5.6.7 Forest management operations shall take into account all socio-economic functions, especially the recreational function and aesthetic values of forests by maintaining for example varied forest structures, and by encouraging attractive trees, groves and other features such as colors, flowers and fruits. This shall be done, however, in a way and to an extent that does not lead to serious negative effects on forest resources, and forestland.	YES	O5 Management of visual quality and recreational benefits PM 5.4 I1	 Performance Measure 5.1. Program Participants shall manage the impact of harvesting on visual quality. <u>11. Program</u> to address <u>visual quality management</u>. <u>12. Incorporation of aesthetic considerations</u> in harvesting, road, landing design and management, and other management activities where visual impacts are a concern Applies to public and private forests. PM 5.2. Program Participants shall manage the size, shape and placement of <u>clear-cut harvests</u>. <u>11. Average size</u> of clear-cut harvest areas does not exceed <u>50 hectares</u>, PM 5.3. Program Participants shall adopt a <u>green-up requirement</u> or alternative methods that provide for visual quality. Indicators: <u>11. Program</u> implementing the green-up requirement or alternative methods. I3. Trees in clear-cut harvest areas are at least 3 years old or 1.5 meters high at the desired level of stocking before adjacent areas are clear-cut,, PM 5.4. Program Participants shall support and promote recreational opportunities for the public. <u>11. Provide recreational opportunities for the public</u>, where consistent with forest management objectives Conclusion - conforms The standard requires consideration of recreational and aesthetic values. The scale of management operations is large with clearcut areas up to 50 ha. The SFI standards, however, restricts the size of clearcut areas compared to the legal thresholds.
5.6.8 Forest managers, contractors, employees and forest owners shall be provided with sufficient information and encouraged to keep up-to-date through continuous training in relation to sustainable	YES	O11 Training and education PM 11.1	PM 11.1. Program Participants shall <u>require appropriate training of</u> <u>personnel and contractors</u> so that they are competent to fulfill their responsibilities under the SFI 2015–2019 Forest Management Standard. 11. Written statement of <u>commitment</u> to the SFI 2015–2019 Forest Management Standard communicated throughout the organization, particularly to facility and woodland managers, and field foresters.

Question	YES / NO*	Reference to scheme documentation	
forest management as a precondition for all management planning and practices described in this standard.		I1, I2, I3, I4, I5 PM 11.2 I1	 12. <u>Assignment and understanding of roles and responsibilities</u> for achieving SFI 2015–2019 Forest Management Standard objectives. 13. <u>Staff education</u> and training sufficient to their roles and responsibilities. 14. <u>Contractor education and training sufficient</u> to their roles and responsibilities. 15. Program Participants shall have <u>written agreements for the use of qualified logging professionals and/or certified logging professionals</u> (where available) and/or wood producers that have completed training programs and are recognized as qualified logging professionals. PM 11.2. Program Participants shall work individually and/or with SFI Implementation Committees, logging or forestry associations, or appropriate agencies or others in the forestry community to <u>foster improvement in the professionalism of wood producers</u>. 11. Participation in or support of SFI Implementation Committees to establish criteria and identify delivery mechanisms for wood producer training courses and periodic continuing education that address: a. awareness of sustainable forestry principles and the SFI program; b. best management practices, including streamside management and road construction, maintenance and retirement; Conclusion - conforms The SFI standard requires competence from workers and contractors and also obliges participants to provide training.
5.6.9 Forest management practices shall make the best use of local forest-related experience and knowledge, such as those of local communities, forest owners, NGOs and local people.	YES	O12 Community involvement and landowner outreach PM 12.1 I2 O8 Recognize and respect indigenous peoples' rights	 PM 12.1. Program Participants shall support and promote efforts by consulting foresters, state, provincial and federal agencies, state or local groups, professional societies, conservation organizations, Indigenous Peoples and governments, community groups, sporting organizations, labor, universities, extension agencies, the American Tree Farm System® and/or other landowner cooperative programs to apply principles of sustainable forest management. 12. Support, individually or <u>collaboratively</u>, education and outreach to forest landowners describing the importance and providing implementation guidance on:

Question	YES / NO*	Reference to scheme documentation	
		PM 8.2 I1 O10 Forestry research, science and technology PM10.2 I1 PM10.3 I1,2	 a. best management practices; b. reforestation and afforestation; c. visual quality management; d. conservation objectives, such as 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., organic and nutrient value to future forests) and other utilization needs; f. control of invasive exotic plants and animals; g. characteristics of special sites; and h. reduction of wildfire risk. PM 8.2 Program Participants with forest management responsibilities on public lands shall confer with affected Indigenous Peoples with respect to sustainable forest management practices. 11 Program that includes communication with affected indigenous peoples to enable Participant to a. understand and respect traditional forest-related knowledge b. identify and protect spiritually, historically, or culturally important sites; c. address the use of non-timber forest products of value to Indigenous Peoples in areas where Program Participants have management responsibilities on public lands; and d. respond to Indigenous Peoples' inquiries and concerns received. PM 10.2. Program Participants shall individually and/or through cooperative efforts involving SFI Implementation Committees, associations or other partners develop or use state, provincial or regional analyses in support of their sustainable forestry programs. 11. Participation, individually and/or through cooperative efforts involving SFI Implementation Committees and/or associations at the national,

Question	YES / NO*	Reference to scheme documentation	
			 state, provincial or regional level, in the development or use of some of the following: a. regeneration assessments; b. growth and drain assessments; c. best management practices implementation and conformance; d. biodiversity conservation information for family forest owners; and e. social, cultural or economic benefit assessments. PM 10.3. Program Participants shall individually and/or through cooperative efforts involving SFI Implementation Committees, associations or other partners broaden the awareness of climate change impacts on forests, wildlife and biological diversity. 11. Where available, monitor information generated from regional climate models on long-term forest health, productivity and economic viability. I2. Program Participants are knowledgeable about climate change impacts on wildlife, wildlife habitats and conservation of biological diversity through international, national, regional or local programs. Conclusion - conforms
5.6.10 Forest management shall provide for effective communication and consultation with local people and other stakeholders relating to sustainable forest management and shall provide appropriate mechanisms for resolving complaints and disputes relating to forest management between forest operators and local people.	YES	O12 Community involvement and landowner outreach PM 12.1 PM 12.3 O13 Public land management responsibilities	 PM 12.1. see PEFC Checklist question 5.6.9 PM 12.3. Program Participants shall establish,procedures to address concerns raised by loggers, consulting foresters, employees, unions, the public or other Program Participants regarding practices that appear inconsistent with the SFI Standard principles and objectives. I1. Support for SFI Implementation Committees (e.g., toll-free numbers and other efforts) to address concerns about apparent nonconforming practices.

Question	YES / NO*	Reference to scheme documentation	
		Sec 11 Public Inquiries and Official Complaints	I2. Process to receive and respond to public inquiries. SFI Implementation Committees shall submit data annually to SFI Inc. regarding concerns received and responses.
		Chapters 2.1, 3, 4	PM 13.1. Program Participants with forest management responsibilities <u>on</u> <u>public lands</u> shall participate in the dev <u>elopment of public land planning</u> <u>and management processes</u> .
		Sec 6 - Guidance to	11. <u>Involvement in public land planning</u> and management activities with appropriate governmental entities and the public.
		SFI 2015–2019 Standards and Rules	I2. Appropriate <u>contact</u> with local stakeholders over forest management issues through state, provincial, federal or independent collaboration
		Ch 13	Section 11 - Public Inquiries and Official Complaints
			Any party is entitled to inform on non-conforming practices first to the Program participant that shall respond within 45 days and also send a copy of the response to its certification body.
			If complainant believes that the issue has not been satisfactorily resolved, he may provide the original documentation and the response from the Program participant to the appropriate SFI Implementation Committee that holds a Inconsistent Practices Program and it will address the issue together with the certification body.
			Complaints related to inconsistent practices and ILO Conventions 87, 98 and 111 shall be first addressed to the Program participant and the certification body. If the given response is unsatisfactory the complainant shall contact the SFI ILO Task Force. The SFI Task Force will inform SFI Board on the issue raised.
			Labour law related issues that are addressed through formal grievance processes or before any of the agencies established by the US National Labor Relations Act, provincial Labor Code or Act or the courts will not be subject to review, consideration or recommendations by the SFI ILO Task Force or the SFI Board of Directors.

Question	YES / NO*	Reference to scheme documentation		
			Section 6 - Guidance to SFI 2015–2019 Standards and Rules, Ch 13 ILO Core Conventions	
			Certification bodies shall actively audit the compliance of the ILO Conventions 87, 98, 111 that are not fully covered by the US legislation.	
			Note that landowners in Alabama, North Carolina and Virginia are by law not allowed to bargain with public employees. Any case they shall provide information on compliance with core ILO Conventions and be part of the complaint procedures as defined in Section 11 of the SFI Standards and Rules.	
			Conclusion – conforms	
			ILO 87 – Freedom of Association and Protection of Right to Organize ILO 98 – Right to Organize and Collective Bargaining ILO 111 – Discrimination (Employment and Occupation)	
			PM 9.2. Program Participants shall take appropriate steps to <u>comply</u> with all applicable <u>social laws</u> at the federal, provincial, state and local levels in the country in which the Program Participant operates.	
5.6.11 Forestry work shall be planned, organized and performed in a manner that enables health and accident risks to be identified and all reasonable measures to be applied to protect workers from work-related risks. Workers shall be informed about the risks involved with their work and about about the risks involved	nd ork- YES		O9 Legal and regulatory compliance PM 9.2 I1,2	11. Written <u>policy</u> demonstrating <u>commitment</u> to comply with <u>social laws</u> , such as those covering civil rights, equal employment opportunities, anti- discrimination and anti-harassment measures, workers' compensation, Indigenous Peoples' rights, workers' and communities' right to know, prevailing wages, workers' right to organize, and <u>occupational health and</u> <u>safety</u> .
with their work and about preventive measures.			I2 Forestry enterprises will respect the rights of workers and labor representatives in a manner that <u>encompasses the intent</u> of the International Labor Organization (ILO) core conventions.	
			The Federal law US Occupational Safety and Health Administration (OSHA) and Canadian Center for Occupational Health and Safety stipulate the detailed requirements for work safety and health. State /	

[©] Indufor Assessment of the Revised Sustainable Forestry Initiative (SFI) Programme Against PEFC Council Requirements – PEFC Council Checklist PEFC IGD 1007-01:2012., Final draft report, June 20, 2016. 98

Question	YES / NO*	Reference to scheme documentation	
			 Provincial legislation sets more specific requirements, e.g. on safety and monitoring. SFI requires contractor screening that includes compliance with e.g. OSHA. Conclusion – conforms Legislation defines the detailed performance requirements.
5.6.12 Working conditions shall be safe, and guidance and training in safe working practices shall be provided to all those assigned to a task in forest operations.	YES	O11 Training and education PM 11.2 I1, 2, 3 O1 Legal and regulatory compliance	 PM 11.2. Program Participants shall work individually and/or with SFI Implementation Committees, logging or forestry associations, or appropriate agencies or others in the forestry community to <u>foster</u> improvement in the professionalism of wood producers. I1. Participation in or support of SFI Implementation Committees to establish <u>criteria and identify delivery mechanisms for wood producer</u> <u>training courses</u> and periodic continuing education that address: f. logging <u>safety</u>; g. U.S. Occupational Safety and Health Administration (OSHA) and Canadian Centre for Occupational Health and Safety (CCOHS) <u>regulations</u>, wage and hour rules, and other provincial, state and local employment laws; 2. The SIC-approved wood producer training programs shall have a continuing education component with coursework that supports the current training programs, safety and the principles of sustainable forestry. 3. Participation in or support of SFI Implementation Committees to establish criteria for recognition of logger certification programs, where they exist, that include: e. logging safety;

[©] Indufor Assessment of the Revised Sustainable Forestry Initiative (SFI) Programme Against PEFC Council Requirements – PEFC Council Checklist PEFC IGD 1007-01:2012.,

Question	YES / NO*	Reference to scheme documentation	
			 PM9.1 Program Participants shall comply with applicable federal, provincial, state and local forestry and related social and environmental laws and regulations. 1. Access to relevant laws and regulations in appropriate locations. 2. System to achieve compliance with applicable federal, provincial, state, or local laws and regulations. 3. Demonstration of commitment to legal compliance through available regulatory action information. Conclusion – conforms The training requirements oblige development and conduct of courses on work safety. Provincial, state and local employment laws set the performance requirements. In areas/organizations with loggers, certification programs the performance requirements may go beyond regulative standards.
5.6.13 Forest management shall comply with fundamental ILO conventions.	YES	Guide to SFI 2020- 2015 ² p. 18-19 O1 Legal and regulatory compliance PM 9.2 I1,2 Independent assessment of the	 Application of SFI 2015–2019 Forest Management Standard Performance Measure 9.2 for Program Participants with respect to their employees operating on lands owned or controlled by Program Participants: PM 9.2. Program Participants shall take appropriate steps to <u>comply with</u> <u>all applicable social laws</u> at the federal, provincial, state and local levels in the country in which the Program Participant operates. I1. Written <u>policy demonstrating commitment to comply with</u> social <u>laws</u>, such as those covering <u>civil rights</u>, <u>equal employment opportunities</u>, <u>anti- discrimination and anti-harassment measures</u>, workers' <u>compensation</u>, <u>Indigenous Peoples' rights</u>, workers' and communities' right to know,

2 Guidance to the SFI 2015-2019 Standards and Rules - SFI Section 6 $\,$

http://www.sfiprogram.org/files/pdf/2015-2019-standardsandrules-section-6-pdf/

Question	YES / NO*	Reference to scheme documentation	
		consideration of ILO Conventions in US legislation (2005) (provided by SFI)	 prevailing wages, <u>workers' right to organize</u>, and <u>occupational health and safety</u>. I2. Forestry enterprises will respect the rights of <u>workers and labor</u> representatives in a manner that encompasses the intent of the International Labor Organization (ILO) core conventions. Indicator 9.2 shall only apply to the core conventions not fully covered by existing U.S. or Canadian law. Right to Organize (No. 87) Right to Organize and Collective Bargaining (No. 98) Discrimination (111). Public forest landowners in states (Alabama, North Carolina and Virginia) that currently have laws prohibiting bargaining with their public employees shall be "grandfathered in" as meeting the requirements in indicator 9.2.2 but must still participate in the information gathering process with their certification bodies (for independent contractors) and the inconsistent practices process in part 8.4 of the Public Inquiries and Official Complaints (Section 11) requirements to aid in the resolution of any issues that may be identified. The SFI standard applies to ILO Conventions 87, 98, 111 that are among the Conventions not ratified by the US. Canada has ratified all athor fundamental ILO Conventions except C 98 and C138 on minimum age of labor. The US has ratified only ILO C 105, Abolition of Forced Labor (1957) and IL C 182 Worst Forms of Child Labor Convention (1999). In 2005 an independent US laywer conducted an analysis on the consideration of the core elements of the following ILO Conventions in the US legislation: ILO Conventions 29, 105 on forced labor, 87 and 98 on right to organize, 100 on equal remuneration, 111 on discrimination and 138 on minimum age of employment. The conclusion was that the US federal level legislation prohibits forced and child labor, guarantees freedom of association, a right to organize, collective bargaining (with some limitations) and equal remuneration.

Question	YES / NO*	Reference to scheme documentation	
			However, Alabama, North Carolina and Virginia have legislation that restrict collective bargaining in public forestry. SFI still requires transparency in labor relations within the limits of legislation, although the state laws in the three states are not fully in line with ILO C 98. PEFC also refers to ILO Convention on Occupational Safety and Health Convention (1981) and 169 Indigenous and Tribal People's Convention (1989) would be covered by legislation to a variable degree. Conclusion - conforms
5.6.14 Forest management shall be based inter-alia on the results of scientific research. Forest management shall contribute to research activities and data collection needed for sustainable forest management or support relevant research activities carried out by other organizations, as appropriate.	YES	O4 Conservation of biological diversity PM 4.1 I2 PM 4.4 I1 O10 Forest research, science and technology	 PM 4.1. Program Participants shall conserve biological diversity. 12. <u>Development of criteria</u> and implementation of practices, as <u>guided by</u> regionally based best scientific information, to retain stand-level wildlife habitat elements such as snags, stumps, mast trees, down woody debris, den trees and nest trees. PM 4.4. Program Participants shall <u>apply knowledge gained through</u> research, science, technology and field experience to manage wildlife habitat and contribute to the conservation of biological diversity. 11. 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 systems. Such participation may include providing non-proprietary scientific information, time and assistance by staff, or in-kind or direct financial support. 12. A methodology to incorporate research results and field applications of biodiversity and ecosystem research into forest management decisions. PM 10.1. Program Participants shall individually and/or through cooperative efforts involving SFI Implementation Committees, associations or other partners provide in-kind support or funding for forest

Question	YES / NO*	Reference to scheme documentation	
			<u>research</u> to improve forest health, productivity and sustainable management of forest resources, and the environmental benefits and performance of forest products.
			11. <u>Financial or in-kind support</u> 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, community issues, or similar areas, which build broader understanding of the benefits and impacts of forest management.
			I2. Research on genetically engineered trees via forest tree biotechnology shall adhere to all applicable federal, state, and provincial regulations and international protocols ratified by the United States and/or Canada depending on jurisdiction of management.
			PM 10.2. Program Participants shall individually and/or through cooperative efforts involving SFI Implementation Committees, associations or other partners <u>develop or use state</u> , provincial or regional <u>analyses</u> in support of their sustainable forestry programs.
			11. Participation, individually and/or through cooperative efforts involving SFI Implementation Committees and/or associations at the national, state, provincial or regional level, in the development or use of some of the following:
			a. regeneration assessments;
			b. growth and drain assessments;
			c. best management practices implementation and conformance;
			d. biodiversity conservation information for family forest owners; and
			e. social, cultural or economic benefit assessments.
			PM 10.3. Program Participants shall individually and/or through cooperative efforts involving SFI Implementation Committees,

Question	YES / NO*	Reference to scheme documentation	
			associations or other partners <u>broaden the awareness of climate change</u> impacts on forests, wildlife and biological diversity.
			11. Where available, <u>monitor information</u> generated from regional climate models on long-term forest health, productivity and economic viability.
			I2. Program Participants are <u>knowledgeable about climate change</u> <u>impacts</u> on wildlife, wildlife habitats and conservation of biological diversity through international, national, regional or local programs.
			Conclusion – conforms
			Requirements to contribute to research and to integrate scientific information to improvement of forest management are compliant with the PEFC requirements
Criterion 7: Legal Compliance			
			PM 9.1. Program Participants shall comply with <u>applicable federal</u> , provincial, state and local forestry and related social and environmental laws and regulations.
			11. Access to relevant laws and regulations in appropriate locations.
5.7.1 Forest management shall comply with legislation applicable to forest management issues including forest management practices;		O9 Legal and	l2. System to achieve compliance with applicable federal, provincial, state, or local laws and regulations.
nature and environmental protection; protected and endangered species; property, tenure and land-use rights for indigenous people; health, labor and safety issues; and the payment of royalties and	YES	regulatory compliance	13. Demonstration of commitment to legal compliance through available regulatory action information.
taxes.			PM 9.2. Program Participants shall take appropriate <u>steps to comply with</u> <u>all applicable social laws</u> at the federal, provincial, state and local levels in the country in which the Program Participant operates.
			11. Written <u>policy demonstrating commitment to comply with social laws</u> , such as those covering civil rights, equal employment opportunities, anti- discrimination and anti-harassment measures, workers' compensation,

Question	YES / NO*	Reference to scheme documentation	
			 Indigenous Peoples' rights, workers' and communities' right to know, prevailing wages, workers' right to organize, and occupational health and safety. I2. Forestry enterprises will respect the rights of workers and labor representatives in a manner that encompasses the intent of the International Labor Organization (ILO) core conventions. Compliance with the environmental legislation is addressed under Objective 4 on biodiversity, 3 on water protection and 2 on forest health (chemical use) Conclusion – conforms
5.7.2 Forest management shall provide for adequate protection of the forest from unauthorized activities such as illegal logging, illegal land use, illegally initiated fires, and other illegal activities.	YES	SFI Policy on illegal logging O 9 Legal and regulatory compliance PM 9.2	 SFI Policy on Illegal Logging³ A. SFI Inc. will not license any person or entity to use SFI's trademarks or labels, and SFI may revoke any license previously granted, if the proposed licensee or an Affiliate of the licensee has been found to have engaged in Illegal Logging by a government authority in the jurisdiction where the logging occurred⁴, unless the evidence available to SFI supports a conclusion that, in the business judgment of the SFI Inc. Board, any incidents of Illegal Logging by the entity are followed by prompt corrective action and do not show a pattern of Illegal Logging. B. SFI Inc. will not license any person or entity to use SFI's trademarks or labels, and SFI may revoke any license previously granted, if the evidence available to SFI supports a conclusion that, in the business

³ As Approved by the SFI Board of Directors September 23, 2008.

⁴ This enables SFI to take action that is based on a government finding (conviction, court decision, regulatory decision, fine etc.) of Illegal Logging. SFI would not make any factual determinations of illegal logging; they would be made by the government. No audit of overseas operations is required unless and until such a finding is made

[©] Indufor Assessment of the Revised Sustainable Forestry Initiative (SFI) Programme Against PEFC Council Requirements – PEFC Council Checklist PEFC IGD 1007-01:2012., Final draft report, June 20, 2016.

Question	YES / NO*	Reference to scheme documentation	
			 judgment of the SFI Inc. Board, the proposed licensee or an Affiliate of the licensee has engaged in a pattern of Illegal Logging⁵. C. Any person or entity whose application for an SFI license has been denied or whose license has been revoked pursuant to this section may reapply for a license upon a showing that any past Illegal Logging has been stopped, that appropriate actions have been taken to prevent it from recurring, and that the proposed licensee and its Affiliates do not knowingly engage in Illegal D. Logging. Such showing shall be supported by a third-party audit conducted by an SFI certification body accredited to conduct 2015-2019 SFI Standard certifications and shall include local expertise as part of the audit team⁶. "Illegal Logging" means harvesting and trading of wood fiber in violation of applicable laws and regulations in the country of harvest. "Affiliate" means any person or entity that directly or indirectly controls, is controlled by, or is under common control with the proposed licensee. "Control" means owning a majority of the stock, appointing a majority of the directors, or otherwise having the practical or legal power to direct the operations of a person or entity. PM 9.2. Program Participants shall take appropriate steps to comply with all applicable social laws at the federal, provincial, state and local levels in the country in which the Program Participant operates.

⁵ 64This enables SFI to take action against a company that is known to engage in a pattern of Illegal Logging, but that has NOT been subject to government enforcement actions (perhaps because the local government is corrupt or ineffective). The SFI Board would need to make the factual determinations based on the best evidence available to it. No audit of overseas operations is required unless and until such a finding is made

⁶ The audit shall cover all operations in all jurisdictions where the illegal logging occurred.

[©] Indufor Assessment of the Revised Sustainable Forestry Initiative (SFI) Programme Against PEFC Council Requirements – PEFC Council Checklist PEFC IGD 1007-01:2012., Final draft report, June 20, 2016.

Question	YES / NO*	Reference to scheme documentation	
			Conclusion - conforms The standard requires legal compliance from participant and SFI demands consistency in legal compliance in certified and non-certified forests under the management of a participant.

PART IV: Standard and System Requirement Checklist for Certification and Accreditation Procedures (Annex 6)

2 Checklist

Referenced SFI documents:	
SFI 2015–2019 Audit Procedures & Auditor Qualifications and Accreditation -	Section 9

- This assessment only address certification and accreditation procedures related to certification against SFI 2015–2019 Forest Management Standard -
- Chain of custody certification and labelling are not included in the assessment. -

No.	Question	Reference to PEFC Council PROCEDURES	YES / NO*	Reference to scheme documentation	
			Cer	tification Bodies	
1.	Does the scheme documentation require that certification shall be carried out by impartial, independent third parties that cannot be involved in the standard setting process as governing or decision making body, or in the forest management and are independent of the certified entity?	Annex 6, 3.1	YES	2015-2019 Audit Procedures & Auditor Qualifications and Accreditation - SFI Section 9	 Scope : document is intended to support, but not replace the audit process requirements contained in <u>ISO 17021:2011, ISO</u> <u>17021-2 and ISO 17065</u>, by providing specific requirements to SFI Program Participants and certification bodies. It is applicable to all forest management, fiber sourcing organizations and chain-of- custody certificate holders when conducting third-party certification, recertification, or surveillance audits to the SFI 2015– 2019 Sections 2, 3 and 4 Standards. Normative reference: Certification bodies and auditors conducting third-party audits to SFI Section 2 (SFM) in the SFI 2015–2019 Standards and Rules

No.	Question	Reference to PEFC Council PROCEDURES	YES / NO*	Reference to scheme documentation	
					 document must conform to the requirements of ISO 17021:2011⁷ (and ISO TS 17021-2⁸) In addition, all certification bodies and auditors conducting third- party audits to SFI Section 2 must conform to all applicable ANAB⁹, ANSI¹⁰ or SCC¹¹requirements and the International Accreditation Forum (IAF) Mandatory Documents (e.g., IAF MD 1, IAF MD 5, IAF MD 11, etc.). 4. Procedures for Implementing the Principles for SFI Auditing <i>ISO 17021:2011 Section 4 addresses general principles</i> <i>associated with auditing, including impartiality, competence,</i> <i>responsibility, openness, confidentiality and responsiveness to</i> <i>complaints</i> <i>Certification bodies, audit team members, and their employers</i> <i>shall not participate in an appraisal, advise a potential purchaser,</i> <i>or broker a purchase of property audited within the prior three</i> <i>years without the written permission of the audited party.</i> <i>Certification bodies, audit team members, and employers shall</i> <i>notify the audited party of participation in such activities after the</i> <i>three-year period immediately upon initiation of such activities for</i> <i>a period of at least 10 years following the audit.</i>

⁷ ISO 17021:2011 - Conformity assessment -- Requirements for bodies providing audit and certification of management systems

⁸ ISO TS 17021-2:2012 Conformity assessment -- Requirements for bodies providing audit and certification of management systems -- Part 2: Competence requirements for auditing and certification of environmental management systems

⁹ ANAB - ANSI-ASQ National Accreditation Board

¹⁰ ANSI – American National Standards Institute (applies to chain of custody and labelling)

¹¹ SCC – Standard Council of Canada

[©] Indufor Assessment of the Revised Sustainable Forestry Initiative (SFI) Programme Against PEFC Council Requirements – PEFC Council Checklist PEFC IGD 1007-

No.	Question	Reference to PEFC Council PROCEDURES	YES / NO*	Reference to scheme documentation	
					 Prior to engaging in an audit and the Program Participant's acceptance of the audit team, the certification bodies and audit team members shall disclose to the party requesting the audit any prior land appraisal or assessment work or land brokerage activity or other professional services they or their employers conducted related to the property to be audited. Conclusion– conforms The SFI certification relies on ISO standards for certification bodies doing management system and product/service certification that explicitly require impartiality. SFI Audit procedures set additional specifications on impartiality
2.	Does the scheme documentation require that certification body for forest management certification (or chain of custody certification against a scheme specific chain of custody standard) shall fulfil requirements defined in ISO 17021 or ISO Guide 65?	Annex 6, 3.1	YES	2015-2019 Audit Procedures & Auditor Qualifications and Accreditation - SFI Section 9	See PEFC Checklist question 1 above Conclusion – conforms CBs doing forest management and fiber sourcing certification shall comply with the standard ISO 17021:2011 on management system certification and CBs doing chain of custody certification shall comply with the standard ISO 17065:2012 on certification of products, processes and services.
3.	Does the scheme documentation require that certification body chain of custody certification against Annex 4 shall fulfil requirements defined in ISO Guide 65?	Annex 6, 3.1	YES	2015-2019 Audit Procedures & Auditor Qualifications and Accreditation - SFI Section 9	CBs doing chain of custody certification shall comply with the standard ISO 17065:2012 on certification of products, processes and services. Conclusion – conforms
4.	Does the scheme documentation require that certification bodies carrying out forest	Annex 6, 3.1	YES	2015-2019 Audit Procedures & Auditor Qualifications and	6.1 Qualifications of Audit Teams

No.	Question	Reference to PEFC Council PROCEDURES	YES / NO*	Reference to scheme documentation	
	certification shall have the technical competence in forest management on its economic, social and environmental impacts, and on the forest certification criteria?			Accreditation - SFI Section 9	Audit teams <u>shall have the competence</u> (knowledge and skills) to conduct an audit in accordance with the principles of auditing. The certification body shall select audit team members <u>appropriate to the</u> <u>scope</u> , <u>scale and geography</u> of the operation being audited. Additionally, at least <u>one member of the audit team shall have</u> <u>knowledge of forestry operations in the region</u> undergoing the audit, at least one member shall have knowledge of applicable <u>laws</u> and regulations, at least one member shall have knowledge of <u>the socio- demographics and cultural issues</u> in the region, and at least one member shall be a <u>professional forester</u> as defined by the Society of American Foresters (SAF), the Canadian Institute of Forestry, or licensed or registered by the state(s) or province(s) in which the certification is conducted. For <u>forest management audits</u> , the audit team shall have expertise that includes pla <u>nt and wildlife ecology</u> , <u>silviculture</u> , forest modeling, forest operations, occupational safety <u>and health</u> , international labor standards, and hydrology. One specialist per discipline is not required to meet any of the above requirements Conclusion - conforms SFI together with the accreditation standard ISO 17021:2012 set complainant competence requirements.
5.	Does the scheme documentation require that certification bodies carrying out C-o-C certifications shall have technical competence in forest based products procurement and processing and material flows in different stages of processing and trading?	Annex 6, 3.1	Yes	Contract on Scheme Administration between SFI and PEFCC PEFC GD 1004:2009 PEFC ST 2003:2012 PEFC ST 2002:2013 ISO 17065	SFI concludes that it is bound through PEFC scheme administration contract, signed with PEFC Council, to observe PEFC requirements on labelling. SFI recognize chain of custody certificates issued against PEFC international chain of custody standard (PEFC ST 2003:2012) and consequently it is bound to require compliance with the PEFC standard on certification bodies certifiying against the standard (PEFC ST 2002:2013). The standard, along with the accreditation

No.	Question	Reference to PEFC Council PROCEDURES	YES / NO*	Reference to scheme documentation	
					standard ISO 17065 require that certification bodies and auditors have the required competence. Conclusion – conforms, if the contractual commitment, can be
					considered as adequate for an evidence
6.	Does the scheme documentation require that certification bodies shall have a good understanding of the national PEFC system against which they carry out forest management or C-o-C certifications?	Annex 6, 3.1	YES	ISO 17065 ISO 17021 SFI 2015–2019 Sec 9 6.1, 7	 7. Accreditation of Certification Bodies The SFI program requires certification bodies to be accredited in order to conduct SFI certifications 6.1. Qualification of Audit Teams Audit teams shall have the competence (knowledge and skills) to conduct an audit in accordance with the principles of auditing. The certification body shall select audit team members appropriate to the scope, scale and geography of the operation being audited. Additionally, at least one member of the audit team shall have knowledge of forestry operations in the region undergoing the audit, at least one member shall have knowledge of applicable laws and regulations, at least one member shall have knowledge of the socio-demographics and cultural issues in the region, and 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 or registered by the state(s) or province(s) in which the certification is conducted. For forest management audits, the audit team shall have expertise that includes plant and wildlife ecology, silviculture, forest modeling, forest operations, occupational safety and health, international labor standards, and hydrology. One specialist per discipline is not required to meet any of the above requirements.

[©] Indufor Assessment of the Revised Sustainable Forestry Initiative (SFI) Programme Against PEFC Council Requirements – PEFC Council Checklist PEFC IGD 1007-

No.	Question	Reference to PEFC Council PROCEDURES	YES / NO*	Reference to scheme documentation	
7.	Does the scheme documentation require that certification bodies have the responsibility to use competent auditors and who have adequate technical know- how on the certification process and issues related to forest management or chain of custody certification?	Annex 6, 3.2	YES	2015-2019 Audit Procedures & Auditor Qualifications and Accreditation - SFI Section 9	 6.2 Qualifications of Auditors ISO document 17021:2011 at Section 7.1 and Section 7.2 addresses general competence requirements for certification bodies providing audit and certification of management. This is supplemented by the environmental management system-specific competence requirements contained in ISO 17021-2. <u>In addition to</u> the competence requirements contained in ISO 17021:2011 and ISO 17021-2, for certifications to the SFI 2015– 2019 Standards, <u>audit team members shall have the education,</u> formal training and experience that promote competency in and comprehension of: a. forestry operations as they relate to natural resource management, including wildlife, fisheries, recreation, ecology, etc.; b. international and domestic sustainable forestry management systems and performance standards including occupational safety and health, and labor standards; and c. certification requirements related to the SFI program. Audit team members who have obtained a professional degree in forestry or a closely related field shall have a minimum of two years' relevant work experience. In addition, section 6.3 sets provisions for the maintenance of the competence Conclusion - conforms CoC certification is not included in the assessment.
8.	Does the scheme documentation require that the auditors must fulfil the general criteria of ISO 19011 for Quality Management Systems auditors or for	Annex 6, 3.2	YES with comment	2015-2019 Audit Procedures & Auditor Qualifications and Accreditation - SFI Section 9	SFI 2015–2019 Forest Management Standard cites as a normative reference ISO 17021 -2: 2012 which specifies additional competence requirements for personnel involved in the audit and certification process for Environmental Management Systems (EMS) and complements the existing requirements of ISO/IEC 17021.

No.	Question	Reference to PEFC Council PROCEDURES	YES / NO*	Reference to scheme documentation	
	Environmental Management Systems auditors?				Conclusion – Conforms with a comment. Comment : ISO 17021 is a standard defining the requirements for bodies doing management system certification. It also sets requirements for certification and auditing procedures and general competence of auditors. It is used by accreditation bodies as a reference standard, whereas ISO 19011 is a guideline intended to help certification bodies to develop their procedures. SFI does not refer to ISO Guideline 19011 on the auditors' competence criteria. It requires compliance with the accreditation standard ISO 17021 that sets compatible requirements for auditors.
9.	Does the scheme documentation include additional qualification requirements for auditors carrying out forest management or chain of custody audits? [*1]	Annex 6, 3.2	YES	2015-2019 Audit Procedures & Auditor Qualifications and Accreditation - SFI Section 9	See PEFC Checklist question 7 above. SFI sets additional requirements for auditors in SFM certification. Conclusion - conforms
			Certif	ication procedures	
10.	Does the scheme documentation require that certification bodies shall have established internal procedures for forest management and/or chain of custody certification?	Annex 6, 4	YES	SFI Checklist; 2015-2019 Audit Procedures & Auditor Qualifications and Accreditation - SFI Section 9	This requirement is addressed via <u>CB conformance to ISO 17021</u> which is normative requirement document in SFI 2015–2019 Forest Management. (1 Scope, 2 Normative reference) Conclusion – conforms ISO 17021 standard requires internal procedures
11.	Does the scheme documentation require that applied certification procedures for forest management certification shall fulfil or be compatible with the requirements defined in ISO 17021?	Annex 6, 4	YES	2015-2019 Audit Procedures & Auditor Qualifications and Accreditation - SFI Section 9	2. Normative Reference Certification bodies and auditors conducting third-party audits to SFI Sections 2in the SFI 2015–2019 Standards and Rules document must conform to the requirements of ISO 17021:2011 and ISO TS 17021-2 Conclusion - conforms

[©] Indufor Assessment of the Revised Sustainable Forestry Initiative (SFI) Programme Against PEFC Council Requirements – PEFC Council Checklist PEFC IGD 1007-

No.	Question	Reference to PEFC Council PROCEDURES	YES / NO*	Reference to scheme documentation	
12.	Does the scheme documentation require that applied certification procedures for chain of custody certification against Annex 4 shall fulfil or be compatible with the requirements defined in ISO Guide 65?	Annex 6, 4	YES	2015-2019 Audit Procedures & Auditor Qualifications and Accreditation - SFI Section 9 7 PEFC ST 2003:2012 PEFC ST 2002:2013	 7. Accreditation of Certification Bodies The SFI program requires certification bodies to be accredited in order to conduct SFI certifications PEFC ST 2002:2013 refers to ISO 17065 on process requirements Conclusion - Conforms if the contractual commitment is considered to give adequate evidence. SFI describes more in detail the requirements set for certification against SFI chainf of custody standard that is required for the issuance of SFI label.
13.	Does the scheme documentation require that applied auditing procedures shall fulfil or be compatible with the requirements of ISO 19011?	Annex 6, 4	YES with comment	2015-2019 Audit Procedures & Auditor Qualifications and Accreditation - SFI Section 9	 ISO 17021, that is a normative standard for certification procedures to be applied in management system audits, is fully compatible with ISO 19011 guidelines. SFI requires adherence to ISO 17021 in forest management audits. Conclusion – conforms with a comment. Comment: See PEFC Checklist question 8 above
14.	Does the scheme documentation require that certification body shall inform the relevant PEFC National Governing Body about all issued forest management and chain of custody certificates and changes concerning the validity and scope of these certificates?	Annex 6, 4	YES SFM CoC	2015-2019 Audit Procedures & Auditor Qualifications and Accreditation - SFI Section 9 PEFC ST 2003:2012	 Preparing and Submitting a Public Report – SFI 2015–2019 Forest Management Standard A Program Participant shall provide a <u>summary audit report</u> (one copy must be in English) <u>to SFI Inc</u>. after the successful completion of certification, recertification, or surveillance audit The summary audit report will be posted on the SFI Inc. website (<u>www.sfiprogram.org</u>) for public review. Conclusion - conforms

No.	Question	Reference to PEFC Council PROCEDURES	YES / NO*	Reference to scheme documentation	
					Publication of summary report will provide the requested information to the SFI.
					Chain of custody:
					PEFC ST 2003:2012
					The certification body shall make information on the validity and scope of any issued certification document publicly available. Note: Certification body's website is an appropriate and recognised mean of making the information publicly available.
					7.7.8 Certification bodies shall immediately inform the relevant PEFC National Governing Body or the PEFC Council where the PEFC National Governing Body does not exist, when certification is granted, suspended, withdrawn, or its scope is changed.
					Conclusion – Conforms, if the contractual commitment is considered to give adequate evidence.
			YES	2015-2019 Audit Procedures & Auditor Qualifications and Accreditation - SFI Section 9	SFI Inc. is the national PEFC governing body in the US and has the right to issue the PEFC logo use licenses. Any organizations with both SFI forest management certification and PEFC chain of custody certification in the US and Canada may apply for PEFC logo licence from SFI Inc.
15.	Does the scheme documentation require that certification body shall carry out controls of PEFC logo usage if the certified entity is a PEFC logo user?	Annex 6, 4		Contract for administration of PEFC scheme (PEFCC and SFI Inc) PEFC logo use contract (SFI Inc. and company; example)	The SFI Office of Label Use and Licensing administers the label use. Through the contract with PEFC Council it is committed to comply with PEFC GD 1004:2009 that states: <i>licensing body shall</i> <i>have mechanisms for the investigation and enforcement of the</i> <i>compliance with PEFC Logo usage rules (PEFC ST 2001:2008)</i> . SFI logo use contract states:
				PEFC GD 1004:2009 6.2.2	 Article 7: Reporting and Presentation 2. The logo user, in case of user group B or C, shall undertake to provide, immediately after each chain of custody (C-o-C) or forest management certification audit, the SFI with a notification, verified by the certification body, of the on-product

No.	Question	Reference to PEFC Council PROCEDURES	YES / NO*	Reference to scheme documentation	
					 <u>use of the PEFC logo,</u> e.g. broken down by product, product category, production unit or similar, to the degree of accuracy that the C-o-C or forest management system used by the logo user permits. In the same conjunction, <u>the logo user shall supply the SFI with a detailed, free form account of any off-product use of the PEFC logo.</u> Thus, both certification body and SFI control the logo use. SFI maintains a database on SFM and CoC certificate and PEFC and SFI logo license holders.
16	Does a maximum period for surveillance audits defined by the scheme documentation not exceed more than one year?	Annex 6, 4	YES	2015-2019 Audit Procedures & Auditor Qualifications and Accreditation - SFI Section 9	Conclusion – conforms 5.2 Audit Scope 5.2.1 At a minimum the audit sampling process shall address all elements of the standards on an: - Annual basis for surveillance audits of conformance with SFI Sections 2 (SFM), of the SFI 2015–2019 Standards and Rules document. - Triennial basis for re-certification audits of conformance with the SFI 2015–2019 Section 2 Standards. - Quinquennial basis for re-certification audits of conformance with the SFI 2015–2019 Chain-of-Custody Standard. Conclusion - conforms
17	Does a maximum period for assessment audit not exceed five years for both forest management and chain of custody certifications?	Annex 6, 4	YES	2015-2019 Audit Procedures & Auditor Qualifications and Accreditation - SFI Section 9	See above Question 16. Conclusion - conforms
18	Does the scheme documentation include requirements for public availability of certification report summaries?	Annex 6, 4	YES	2015-2019 Audit Procedures & Auditor Qualifications and Accreditation - SFI Section 9	Preparing and Submitting a Public Report – SFI 2015–2019 Forest Management Standard A Program Participant shall provide a <u>summary audit report</u> (one copy must be in English) <u>to SFI Inc</u> . after the successful completion

[©] Indufor Assessment of the Revised Sustainable Forestry Initiative (SFI) Programme Against PEFC Council Requirements – PEFC Council Checklist PEFC IGD 1007-

Question	Reference to PEFC Council PROCEDURES	YES / NO*	Reference to scheme documentation	
				of certification, recertification, or surveillance audit The summary audit report will be posted on the SFI Inc. website (www.sfiprogram.org) for public review. Conclusion - conforms
Does the scheme documentation include requirements for usage of information from external parties as the audit evidence?	Annex 6, 4	YES	2015-2019 Audit Procedures & Auditor Qualifications and Accreditation - SFI Section 9	 5.4 Determination of conformance 5.4.1 Evidence shall be compiled by examining operating procedures, materials relating to forestry practices and on-the-ground field performance, and through meetings or correspondence with employees, contractors and other third parties (e.g., government agencies, community groups, affected Indigenous Peoples, conservation organizations), as appropriate, Conclusion - conforms
Does the scheme documentation include additional requirements for certification procedures? [*1]	Annex 6, 4	YES		Scheme requirements additional to those in ISO 17021 or ISO 17065 are outlined in SFI Section 9, Parts 4, 5, 6 and 7. Conclusion - conforms
		Accre	ditation procedures	
Does the scheme documentation require that a national accreditation body shall accredit certification bodies carrying out forest management and/or chain of custody certification?	Annex 6, 5	YES	2015-2019 Audit Procedures & Auditor Qualifications and Accreditation - SFI Section 9	<u>All certification, recertification and surveillance audits to Sections 2</u> and 3 in the SFI 2015–2019 Standards and Rules document shall be conducted by <u>certification bodies accredited</u> by the ANSI-ASQ All certification, recertification and surveillance audits to Section 3 – Appendix 1: certification bodies accredited by the American National Standards Institute (ANSI) or the Standards Council of Canada to conduct SFI certifications shall conduct Rules for Use of SFI Certified Sourcing Label and Section 4 in the SFI 2015–2019
	Does the scheme documentation include requirements for usage of information from external parties as the audit evidence? Does the scheme documentation include additional requirements for certification procedures? [*1] Does the scheme documentation require that a national accreditation body shall accredit certification bodies carrying out forest management and/or chain of	QuestionPEFC Council PROCEDURESDoes the scheme documentation include requirements for usage of information from external parties as the audit evidence?Annex 6, 4Does the scheme documentation include additional requirements for certification procedures? [*1]Annex 6, 4Does the scheme documentation require that a national accreditation body shall accredit certification bodies carrying out forest management and/or chain ofAnnex 6, 5	QuestionPEFC Council PROCEDURESYES / NO*PROCEDURESYES / NODoes the scheme documentation include requirements for usage of information from external parties as the audit evidence?YESDoes the scheme documentation include additional requirements for certification procedures? I*1Annex 6, 4YESDoes the scheme documentation include additional requirements for certification procedures? I*1Annex 6, 4YESDoes the scheme documentation include additional requirements for certification procedures? I*1Annex 6, 4YESDoes the scheme documentation require that a national accreditation body shall accredit certification bodies carrying out forest management and/or chain ofAnnex 6, 5YES	QuestionPEFC Council PROCEDURESYES / No*Reference to scheme documentationDoes the scheme documentation include requirements for usage of information from external parties as the audit evidence?YES2015-2019 Audit Procedures & Auditor Qualifications and Accreditation - SFI Section 9Does the scheme documentation include requirements for usage of information from external parties as the audit evidence?Annex 6, 4YES2015-2019 Audit Procedures & Auditor Qualifications and Accreditation - SFI Section 9Does the scheme documentation include additional requirements for certification procedures? [*1]Annex 6, 4YES2015-2019 Audit ProceduresDoes the scheme documentation require that a national accreditation body shall accredit certification body shall accredit certification bodies carrying out forest management and/or chain ofAnnex 6, 5YES2015-2019 Audit Procedures & Auditor Qualifications and Accreditation - SFI Section 9

[©] Indufor Assessment of the Revised Sustainable Forestry Initiative (SFI) Programme Against PEFC Council Requirements – PEFC Council Checklist PEFC IGD 1007-

No.	Question	Reference to PEFC Council PROCEDURES	YES / NO*	Reference to scheme documentation	
					National Accreditation Board (ANAB) or the Standards Council of Canada (SCC) to conduct SFI certification.
					Conclusion - conforms
	Does the scheme documentation require		YES	ISO 17021 -2011	ISO 17021 -2011 at Section 8.2 Certification Documents requires that accredited certificates bear an accreditation symbol: 8.2.3 The certification document(s) shall identify the following:
22.	that an accredited certificate shall bear an accreditation symbol of the relevant accreditation body?	Annex 6, 5			g) the name, address and certification mark of the certification body; other marks (e.g. accreditation symbol) may be used provided they are not misleading or ambiguous.
					SFI Sec requires compliance with ISO 17021
					Conclusion - conforms
	Does the scheme documentation require that the accreditation shall be issued by an accreditation body which is a part of the International Accreditation Forum (IAF) umbrella or a member of IAF's		YES	2015-2019 Audit Procedures & Auditor Qualifications and Accreditation - SFI Section 9	 7. Accreditation of Certification Bodies The SFI program requires certification bodies to be accredited in order to conduct SFI certifications and issue certificates. Certification body: an independent third party that is accredited by: US: ANSI-ASQ National Accreditation Board (ANAB) as being competent to conduct certifications to the SFI 2010-2015 Standards Sections 2 (SFM standard) and 3 (Fiber sourcing that is not part of this assessment)
23.	special recognition regional groups and which implement procedures described in ISO 17011 and other documents recognized by the above mentioned organizations?	Annex 6, 5			 US: American National Standards Institute (ANSI) as being competent to conduct certifications to the SFI 2015–2019 Chain-of-Custody Standard Section 4 and SFI Section 3 – Appendix 1: Rules for Use of SFI Certified Sourcing Label (see comment below).
					 Canada: Standards Council of Canada (SCC) as being competent to conduct certifications to the SFI 2015–2019 Standards Sections 2 (SFM standard) and 3 and the SFI 2015– 2019 Chain-of-Custody Standard Section 4 and Section 3, Appendix 1: Rules for Use of SFI Certified Sourcing Label.

01:2012., Final draft report, June 20, 2016.

[©] Indufor Assessment of the Revised Sustainable Forestry Initiative (SFI) Programme Against PEFC Council Requirements – PEFC Council Checklist PEFC IGD 1007-

No.	Question	Reference to PEFC Council PROCEDURES	YES / NO*	Reference to scheme documentation	
					Conclusion – conforms
					Provisions for accreditation conform with PEFC requirements on SFM certification.
					Comment : The accreditation requirements make reference only to the SFI chain of custody standard, but they also conform to the PEFC accreditation requirements for PEFC chain of custody certification.
24.	Does the scheme documentation require that certification body undertake forest management or/and chain of custody certification against a scheme specific chain of custody standard as "accredited certification" based on ISO 17021 or ISO Guide 65 and the relevant forest management or chain of custody standard(s) shall be covered by the accreditation scope?	Annex 6, 5	YES		All certification, recertification and surveillance audits to Sections 2 (SFM) and in the SFI 2015–2019 Standards and Rules document shall be conducted by certification bodies accredited by the ANSI- ASQ National Accreditation Board (ANAB) or the Standards Council of Canada (SCC) to conduct SFI certification. Conclusion - conforms
25.	Does the scheme documentation require that certification body undertake chain of custody certification against Annex 4 as "accredited certification" based on ISO Guide 65?	Annex 6, 5	N.A		CoC certification is not covered by this assessment
26.	Does the scheme documentation include a mechanism for PEFC notification of certification bodies?	Annex 6, 6	YES with comment	SFI – Certification body notification contracts List of notified certification bodies	SFI Inc. is committed to notify certification bodies based on the contract with PEFC Council on administration of the PEFC scheme (PEFC GD 1004:209). The contract obligesdevelopment of written notification procedures, which SFI has disclosed in individual contracts with certification bodies.

No.	Question	Reference to PEFC Council PROCEDURES	YES / NO*	Reference to scheme documentation	
					 SFI Inc. (PEFC US) has notification contracts with certification bodies doing forest and chain of custody certification for US based PEFC CoC certificate holders. SFI Inc. also has PEFC logo use contracts with each PEFC CoC certificate holder that wish to use the PEFC logo, and notification contracts with certification bodies Certification bodies collect notification fees from chain of custody certificate holders and submit them to SFI Inc. SFI Inc. lists the notified certification bodies that provide services in the US and/or Canada http://www.sfiprogram.org/files/pdf/certification-bodies/ Conclusion – conforms with a comment: Comment: SFI should describe the notification procedures in publicly accessible SFI system documentation. The evidence provided for the assessment is based on confidential notification
27.	Are the procedures for PEFC notification of certification bodies non-discriminatory?	Annex 6, 6	YES with comment	Terms of notification contracts	contracts. The notified certification bodies shall have valid accreditation to SFM or CoC certification as defined by the SFI Program, agree to collect and submit notification fees defined in the contracts and commit to other responsibilities defined for notified certification body, e.g. provide information on issued certificates and summary of SFM audit report, agree to be listed on SFI and PEFC Internet databases. Contracts may limit the notification to cover only certifications done in the US and/or Canada. Conclusion – conforms with a comment:

[©] Indufor Assessment of the Revised Sustainable Forestry Initiative (SFI) Programme Against PEFC Council Requirements – PEFC Council Checklist PEFC IGD 1007-

No.	Question	Reference to PEFC Council PROCEDURES	Reference to scheme documentation	
				Comment : SFI should emphasize impartiality of notification in related procedure descriptions. Also any justification why the SFI restricts the notification to US and/or Canada should be disclosed.

Part V: Standard and System Requirement Checklist for system specific Chain of custody standards

Chain of custody certification is not covered by this assessment. It will be outside the scope of the applied PEFC endorsement.

Part VI: Standard and System Requirement Checklist for scheme administration requirements

2 Checklist

No.	Question	Reference to PEFC GD 1004:2009	YES / NO*	Reference to application documents						
	PEFC Notification of certification bodies									
1.	Are procedures for the notification of certification bodies in place, which comply with chapter 5 of PEFC GD 1004:2009, Administration of PEFC scheme? Quote: PEFC GD 1004:2009 PEFC notification of certification bodies 5.1 The notifying body shall have written procedures for the PEFC notification which ensure that : a) the PEFC notified certification body is meeting the PEFC Council's and PEFC endorsed scheme's requirements for certification bodies, b) the scope of the PEFC notification, i.e. type of certification (forest management or chain of custody certification), certification standards and the country covered by the notification, is clearly defined , c) the PEFC notification may be terminated by the notifying body in the case of the certification body's non adherence to the conditions of the PEFC notification or in the case of the cancellation of the	Chapter 5	YES with a comment	SFI – Certification body notification contracts List of notified certification bodies See PEFC question 26 above	 SFI Inc. is committed to notify certification bodies based on the contract with PEFC Council on administration of the PEFC scheme (PEFC GD 1004:2009). The contract obliges development of written notification procedures, which SFI has disclosed in individual contracts with certification bodies. The notification procedures are defined in individual contracts but not in the SFI 2015–2019 Standards and Rules. SFI Inc. (PEFC US) has notification contracts with certification bodies doing forest and chain of custody certification for US based PEFC CoC certificate holders. Certification bodies collect notification fees from chain of custody certificate holders and submit them to SFI Inc. SFI Inc. lists the notified certification bodies that provide services in the US and/or Canada 					

	PEFC GD 1004:2009	YES / NO*	application documents	
contract between the PEFC Council and the authorized body, d) the PEFC notification is based on a written contract between the notifying body and the PEFC notified certification body ,e) the PEFC notified certification body provides the notifying body with information on certified entities as required by the PEFC Registration System , f) the PEFC notification does not include any discriminatory measures, such as the certification body's country of origin, affiliation to an association, etc.				http://www.sfiprogram.org/files/pdf/certification-bodies/ Conclusion – conforms with a comment Comment : SFI should describe the notification procedures in publicly accessible SFI system documentation. The evidence provided for the assessment is based on confidential notification contracts.
5.2 The notifying body may charge a fee for the PEFC notification. The authorized body shall inform the PEFC Council about the level of its PEFC notification fees, when requested.				
	PEFC	Logo usage li	censing	
 Are procedures for the issuance of PEFC Logo usage licenses in place, which comply with chapter 6 of PEFC GD 1004:2009, <i>Administration of PEFC</i> <i>scheme</i>? The PEFC Logo usage license shall be issued to an individual legal entity based on the requirements of PEFC ST 2001:2008. may issue a PEFC Logo usage multi-license 	Chapter 6	YES	SFI and PEFCC Contract for Administration of PEFC Scheme PEFC GD 1004:2008 Logo Usage Contract	The SFI Office of Label Use and Licensing issues PEFC logo use licenses. Through the contract with PEFC Council, SFI is obliged to conform to the PEFC ST 2001:2008 on Logo Use Rules (PEFC GD 1004:209). The requirements for PEFC logo licensing and logo use rules are referred to on SFI web site: <i>To use the PEFC label, a company must have a valid</i>
	 d) the PEFC notification is based on a written contract between the notifying body and the PEFC notified certification body ,e) the PEFC notified certification body provides the notifying body with information on certified entities as required by the PEFC Registration System ,f) the PEFC notification does not include any discriminatory measures, such as the certification body's country of origin, affiliation to an association, etc. 5.2 The notifying body may charge a fee for the PEFC notification. The authorized body shall inform the PEFC Council about the level of its PEFC notification fees, when requested. Are procedures for the issuance of PEFC Logo usage licenses in place, which comply with chapter 6 of PEFC GD 1004:2009, Administration of PEFC scheme? The PEFC Logo usage license shall be issued to an individual legal entity based on the requirements of PEFC ST 2001:2008. 	d) the PEFC notification is based on a written contract between the notifying body and the PEFC notified certification body ,e) the PEFC notified certification body provides the notifying body with information on certified entities as required by the PEFC Registration System , f) the PEFC notification does not include any discriminatory measures, such as the certification body's country of origin, affiliation to an association, etc. 5.2 The notifying body may charge a fee for the PEFC notification. The authorized body shall inform the PEFC Council about the level of its PEFC notification fees, when requested. Are procedures for the issuance of PEFC Logo usage licenses in place, which comply with chapter 6 of PEFC GD 1004:2009, Administration of PEFC scheme? - The PEFC Logo usage license shall be issued to an individual legal entity based on the requirements of PEFC ST 2001:2008. may issue a PEFC Logo usage multi-license to a holder of a multi-site chain of custody	d) the PEFC notification is based on a written contract between the notifying body and the PEFC notified certification body ,e) the PEFC notified certification body provides the notifying body with information on certified entities as required by the PEFC Registration System , f) the PEFC notification does not include any discriminatory measures, such as the certification body's country of origin, affiliation to an association, etc. 5.2 The notifying body may charge a fee for the PEFC notification. The authorized body shall inform the PEFC Council about the level of its PEFC notification fees, when requested. Are procedures for the issuance of PEFC Logo usage licenses in place, which comply with chapter 6 of PEFC GD 1004:2009, Administration of PEFC scheme? - The PEFC Logo usage license shall be issued to an individual legal entity based on the requirements of PEFC ST 2001:2008. may issue a PEFC Logo usage multi-license to a holder of a multi-site chain of custody	d) the PEFC notification is based on a written contract between the notifying body and the PEFC notified certification body ,e) the PEFC notified certification body provides the notifying body with information on certified entities as required by the PEFC Registration System , f) the PEFC notification does not include any discriminatory measures, such as the certification body's country of origin, affiliation to an association, etc. 5.2 The notifying body may charge a fee for the PEFC notification. The authorized body shall inform the PEFC Council about the level of its PEFC notification fees, when requested. Are procedures for the issuance of PEFC Logo usage licenses in place, which comply with chapter 6 of PEFC GD 1004:2009, Administration of PEFC scheme?

No.	Question	Reference to PEFC GD 1004:2009	YES / NO*	Reference to application documents	
	 The licensing body shall have written procedures for the PEFC Logo licensing The licensing body shall have a mechanism for the investigation and enforcement of the compliance with PEFC Logo usage rules (PEFC ST 2001:2008) 				http://www.sfiprogram.org/files/pdf/pefc-international- 2009-02pdf/andCertified companies that intend to use the PEFC label but have not yet obtained a license are required to contact SFI's Office of Label Use & Licensing. As PEFC's National Governing Body for the United States, the SFI Office of Label Use & Licensing answers questions on PEFC label use, issues PEFC logo use licenses, provides trademark approvals and maintains PEFC notification contracts with accredited certification bodies for CoC and Forest Management standards. http://www.sfiprogram.org/sfi-standard/pefc/The written procedures for logo licensing (cf. Section 5 of SFI Standards and Rules apply only to SFI Label. The SFI Program relies on PEFCC GD 1004:2008 on the issuance of PEFC logo.SFI is PEFC logo licensing body for applicants that have SFI forest management and/or PEFC chain of custody certificate in the US. In Canada the applicant shall have both certificates. In Canada PEFC Canada issues logo licenses if applicant has only PEFC chain of custody certificate.Conclusion – conforms

	Complaints and dispute procedu	ires
 Are complaint and dispute procedures for usage licenses in place, which comply with chapter 6 of PEFC GD 1004:2009, Administration of PEFC scheme? Quote: 1 The PEFC Council and the authorized bodies shall have written procedures for dealing with complaints relating to the governance and administration of the PEFC scheme.8.2 Upon receipt of the complaint, the procedures shall provide for: a) acknowledgement of the complaint to the complainant, b) gathering and verification of all necessary information, validation and impartial evaluation of the complaint, c) formal communication of the decision on the complaint and the complaint handling process to the complainant and concerned parties 	YES	Appendix 1 Public Inquiries and Official Complaints - Section 11The grievance procedures describe reporting and addressing of identified non-compliant actions.Information shall be shared with the Program participant and certification body. The Program participant shall react within 45 days to the complain and communicate the reply to the complaining party and certification body.If the issue is not satisfactory settled, the SFI Implementation Committees will be informed.Issues related to non-compliance with core ILO Conventions will be addressed by the SFI ILO Task Force.The decision on the complaint will be communicated to the complainant within the given time (45 days in general). The complaint procedures focus on SFI Program implementation. Conclusion - conforms

Appendix 2

List of Stakeholders in the Forest Management Task Group

	Stakeholder organization (representatives)	Category	Country
1	Resources Management Service	Other	US
2	North Carolina State University	Education	US
3	Wild Turkey Federation	ENGO	US
4	Manomet Center for Conservation	Research	US
5	Ducks Limited	ENGO	Canada
6	Michigan State University	Education	US
7	World Resources Institute	Research	US
8	National Wild Turkey Federation	ENGO	US
9	Stuwix Resources	Industry	Canada
10	Yakama Nation	Indigenous	US
11	Plum Creek Timber	Industry	US
12	Louisiana-Pacific	Industry	Canada
13	Western Canada SIC	Industry	Canada
14	Weyerhaeuser NR Company	Industry	US and Canada
15	Seven Islands Land Company	Other	Canada

Table 1 Forest Management Task Group

Forest Management Task Groups drafts a proposal for a standard.

Public consultation with almost 10 000 invited parties comment the draft.

Appendix 3

Summary of Stakeholder Replies

Aggregated results	
Did you participate in the standard development?	Yes-12 responses
By whom and when were you invited to participate to the development of the SFI 2015–2019 Forest Management Standard?	SFI staff-12 responses
What was your main interest to consider participation to standard development?	We hold numerous SFI certifications including Certified Sourcing, and Chain of Custody.
	I am a biologist/environmental manager for a wood products manufacturing company and participate in our company's SFI Certification Program.I wanted to contribute to the SFI standard development because I have seen first-hand, how effective it has been in terms of improving the on-the-ground operations/accountability. It is a great organization, and I like how they think outside the box-wanted to be a part of something great!
	I was interested in improving some of the biodiversity and landscape considerations in the standards
	Represent the timber harvesting community
	To ensure the standard criteria would meet social and ecological sustainability expectations of our customers and be economically viable to implement.
	Provide advice regarding practices in Western Canada on behalf of Western Canada SFI Committee members.
	Understanding the suggested changes and the reasons for the changes
	Maintaining high standards but also practicality to ensure that the standard could be understood amongst practitioners and implemented on the ground. Trying to manage the costs associated with standard revisions was also a real concern in order to make sure that the standard remains relevant and attainable, yet still challenging.
	To ensure that non-timber resource values were represented.
	is committed to sustainable forestry and SFI's voluntary standards are tools that can help verify sustainable forest practices are occurring
	To be aware of the process, to contribute to the process, and to be able to advocate for the state/region in which we practice forest management. Not just for my organization but also the other forest management organizations in this state/region.
	We use the Standard and want to ensure it is rigorous and yet practical
In your view, have all interested parties	Yes-12 responses
relevant to standard development been proactively identified and invited and given the possibility to participate and contribute	SFI has increased their outreach to tribes and wildlife-centric NGOs, which is great.
to the standard development?	In addition to task group participation, there are extensive opportunities to participate via the commenting process. The task group members review all comments.
Did the organizer provide you with adequate material before the process?	Yes-12 responses
Did the stakeholders in the standard	Yes-11 responses
setting working groups represent the different interests in a balanced way?	I don't know-1 response All stakeholder groups were represented-within the working
	committees and through the public comment. Public comments

Aggregated results			
	were brought to the working committees and mix of perspectives on the committee generated open and lively discussions.		
	While there were opportunities to engage, I feel there was not enough equal representation of the public-landowner perspective or the Midwest region in the US There is lots of focus in Canada, the Western US, and the SE US, which is understandable because that is where the growth opportunities are. Still, the bread and butter (those that made SFI successful in the US) need to be represented.		
Did the revision process follow the	Yes-12 responses		
procedures that were communicated with participants in advance?	There were only a few highly controversial issues where even a bit more transparency could have been provided regarding negotiations and explanation/context re: the resolution. Otherwise, SFI is very thorough and transparent and this is a great strength of the SFI system.		
Were you aware of any substantive or	No-12 responses		
procedural complaints by any stakeholder on standard development?	I do not understand what you are looking for here.		
	I was not aware there were any in which to be aware.		
Are you aware of any dispute settlement procedures in case of conflicting views in standard development?	No-10 responses Yes-1 response I don't know-1 response		
	Did not hear about any.		
	Not aware so cannot comment.		
Do you believe any aspects of the standard or its development process	No-9 responses Yes-3 responses		
deserve further consideration?	Always room to grow and build upon what we learn. SFI does a great job in always working to strengthen aspects of the standard and does a good job in seeking feedback from stakeholders on standard development		
	The standards are constantly evolving with new insights and information, so they will always deserve continuing attention and consideration.		
	Illegal logging definition		
	Maintaining high standards but also practicality to ensure that the standard could be understood amongst practitioners and implemented on the ground. Trying to manage the costs associated with standard revisions was also a real concern in order to make sure that the standard remains relevant and attainable, yet still challenging.		
	The process of setting up taskforce groups with experts and specialists is a great idea. This helps ensure all voices are heard and that there is balance during the process. It also created buy-in. Great system.		
	I felt that the development process was open, transparent, and thorough. All interested parties had multiple opportunities to provide input.		
	I feel they were covered adequately for the time. Additional review as per the regular schedule is in order.		
Have you been given a meaningful opportunity to contribute to standard formulation and to submit comments for further consideration?	Yes-11 responses I don't know-1 response		

A serve sected requilto			
Aggregated results			
Were the views and comments submitted	Yes-10 responses		
by any participant in the Standard Setting	Not answered-1 response		
Working Groups considered in an open	I don't know-1 response		
and transparent way?			
Have all comments received in public	Yes-10 responses		
consultations been discussed and	Not answered-1 response		
addressed in an objective and transparent	I don't know-1 response		
way?			
Were the criteria (requirements) in the	Yes-10 responses		
standard agreed on in consensus?	I don't know-2 responses		
Other comments and/or remarks	The SFI program recognizes the need for logger training and education and actually attempts to make certain that all loggers are trained. What is really needed is logger input as to what training would really benefit the process. In addition, there needs to be more discussion around illegal logging. I am not comfortable with making any exceptions to federal, provincial, state and local statutes.		
	The SFI Inc. staff went to great lengths to invite and consider a diverse range of stakeholder perspectives. They successfully invited representatives from indigenous peoples and ENGO groups to participate on the Forest Management Task group (and at other places in the revision process). The approach and atmosphere was open and respectful and my perspective was that participants felt like all views were valued and had influence.		

Appendix 4

Comments of Panel of Experts

Indufor note: The table below includes substantial comments. Editorial comments are corrected directly to the report.

Assessment Report - Assessment of the Revised Sustainable Forestry Initiative (SFI) Program Against PEFC Council Requirements / Indufor

Panel of Experts comments

General Statement on report quality

This assessment report is exemplarily well and carefully prepared. Due to this fact – it certainly gives the impression that also the revised SFI Program must be as well and carefully prepared[©]. The report is clearly structured, easy to read and to understand. It gives clear and credible view of the SFI revision process. Especially the extensive and voluminous appendix One shows, how carefully the assessment process has been carried out by the assessor.

Clearly structured, easy to follow.

Specific findings

Report chapter / page	Consultant's report statement	PoE member finding	Consultant's response
1.1 p. 1	Review of the chain of custody and labelling rules are not part of the applied PEFC endorsement and they are not covered by this assessment.	It would be nice but also interesting to know the reason(s) for this exclusion.	SFI requires the compliance with international PEFC chain of custody standard (PEFC ST 2002:2013) when it issues PEFC logo licenses in the US. In Canada logo licenses are issued by CSA. SFI runs own chain of custody standard and labelling program that is widely used. The sentence is changed as follows: The review addresses the SFI provisions for PEFC chain of custody certification and PEFC labelling to the level that ensures that label use licenses are issued in line with PEFC requirements.
1.1 / 1	The SFI 2015-2019 standards and rules were adopted on November 5, 2014 and submitted for the PEFC endorsement on September 30, 2015.	It should be explained why there was almost one year between adoption of the standard and submission to PEFCC (the	The SFI standard was officially released on January 1 st , 2015. The PEFC Council and SFI discussed on the endorsement procedures, which allowed SFI to submit the standard for endorsement in September 2015.

Report chapter / page	Consultant's report statement	PoE member finding	Consultant's response
		standard is in effect since 1/2016). See also p. 21.	No change is made to report
1.2 p. 2	No comments were received during the (international) consultation.	Why? Or is it customary practise in PEFC assessments?	It happens regularly that people do not make any comments in international consultation organized by the PEFC Council.
2. p. 3	List of Comments	These comments to clarify assessor's view of the conformity of SFI are well justified	Acknowledged
2. p. 3	The identified non-conformity in the control of PEFC logo use should be corrected by SFI Inc. before a positive endorsement decision can be made	I have not found this non- conformity identified in the assessment report! It would be important to introduce the non- conformity already in the "recommendation" chapter – as well as proposed actions of the assessor to solve it.	The recommendation was reformulated: The recommendation of Indufor is that PEFC Council endorses the revised SFI 2015–2019 forest certification standard and procedures and PEFC labelling procedures, taking into consideration the following comments that justify the conclusions and request for improvement in compliance with the PEFC rules. The gap of information on logo use rules was classified as a comment and not a non-conformity.
2/3	The identified non-conformity in the control of PEFC logo use should be corrected by SFI Inc. before a positive endorsement decision can be made.	Why is correction required before endorsement? According to 4.3. (chapter Methods) correction is required within 6 months or an even longer period.	See above
pp. 6–33	Numbering of comments of the assessor	On page 6 the numbering of assessor's comments begin with 1. and 2., continues on page 7 with 3., on page 8 with 4. and 5., on page 9 with 6. but then on page 32 the number is again 6. and on page 33 the numbers are 4. and 5. – It is confusing!	The Chapter 3 on page 6 summarizes the results and comments described in the main text. The purpose is to keep the comment number fixed when talking about the same specific issue. This will enable a reader to trace the comments to the more extensive discussion in the main text.
3.3 p. 6	The two comments: 1. and 2.	Comments are well argued and easy to accept	Acknowledged

Report chapter / page	Consultant's report statement	PoE member finding	Consultant's response
3.4 p. 7	However, the level of information varied between audit reports. SFI should guide certification bodies on disclosing forest management plan related information, what would lead to more harmonized and better quality information.	This sounds well justified – SFI should follow this proposal	Acknowledged
3.6 p. 9	The SFI Program has notification procedures that conform to PEFC requirements, but the Program should make them publicly available in documentation on the requirements for certification bodies. The contract defines the notification conditions that are non-discriminatory		Acknowledged
3.7 p. 9	SFI should describe in publicly available documents the procedures and conditions on logo licensing and logo use. Currently companies are encouraged to contact the SFI Office of Label Use and Licensing on the issue	_ " _	Acknowledged
4.1 /11	 The SFI Program compliance with the following PEFC standard is not assessed in this report, because SFI Inc. decided to exclude group certification standard, chain of custody certification and PEFC logo licensing from the assessment. PEFC ST 1002:2010, Group Forest Management Certification – Requirements. 	After "assessment" there should be a colon instead of full stop (point), otherwise unclear. For the reader it is unclear why there is only one standard (for group certification) is listed and not other standards referring to CoC and logo (listed above).	Originally SFI requested that group certification, PEFC chain of custody and logo licensing are not part of the assessment. However, assessor had to review SFI provisions for PEFC chain of custody and labelling in order to collect evidence on appropriate procedures for PEFC logo licensing. The sentence in italic is added to the report.
6.1 p. 22	short rotation forest stands, e.g. fast growing eucalyptus plantations or agro- forestry stands are not within the scope	Does this mean that fast growing plantations are not possible to certify according SFI in US or	Guidance to SFI 2015-2019 Standards and Rules Section 6, paragraph 2 on Application of the SFI Standards gives a reply to the question:

Report chapter / page	Consultant's report statement	PoE member finding	Consultant's response
	of the SFI certification. The standard applies to any organization that owns or has a management authority on forest land.	Canada? Are there plans to create a standard of its own for these plantations, or is this question only marginal in US and Canada? – Some more information should be added!	Standards are intended to apply to forest management systems that are classified as natural forest systems, managed natural forests and plantation forests. Management operations that are classified as short rotation woody crops or agro- forestry are not within the scope of the SFI 2015– 2019 Standards and Rules. Reference to the Guidance document is added to the report http:www.sfiprogram.org/files/pdf/2015-
6.2.1 p. 24	SFI procedures on publication of the summaries conform to the PEFC requirements, but Indufor raised a comment that SFI should give more guidance on certification bodies to ensure more informative and harmonized summaries of forest management plans	This sounds well justified – SFI should follow this proposal	2019-standardsandrules-section-6-pdf/ Acknowledged
6.2.6 / p. 28 and 29	International Labor Conventions The SFI standard addresses requirement set in ILO Conventions 87, 98, 111 ¹ not ratified by the US (Table 6.1). The requirements of the other Conventions (ILO C 100 Equal Remuneration (1951), 105 Abolition of Forced Labor (1957), 138 Minimum Age for Admission to Employment (1973), 182 Worst Forms of Child Labor Convention (1999) are ratified and consequently addressed by relevant legislation.	The listing in the text is wrong. According to ILO website the US has ratified only conventions 105 and 182; Conv. 29 is missing at all in the text. The text is not in line with the listing in table 6.1. In the table the status of ILO 138 in Canada is missing. The status of ILO Conv. 182 is not correct, as it is ratified. What about ILO Conv. 138 in Canada, which is not ratified? How is this addressed in the	The information on ratification status of ILO Conventions in the US and Canada was corrected to the report and Appendix 1. Conclusions and justifications were revised accordingly.

Report chapter / page	Consultant's report statement	PoE member finding	Consultant's response
	SFI has a special ILO Task Force that addresses complaints related to inconsistent practices with ILO Conventions 87, 98 and 111.	standard (no indication found in the text)? Please check also the respective documentation in the Appendix. This chapter needs to be overworked. What about the other conventions not ratified? Why are they not dealt with by the task force?	The forest management task group and SFI board and stakeholder comments determined that the other ILO Convention related issues were adequately addressed by legislation in the US and Canada. Stakeholder input has not raised the incompliance with ILO Convention as an issue in previous or current standard development. In the US the ratified Conventions (105, 182) together with the C 87, 98 and 111 address all the four key areas of fundamental ILO Conventions, i.e. freedom of association and bargaining, forced labor, abolition of child labor and elimination of discrimination. In addition, an independent legal review concluded that the US legislation is compatible with the ILO Conventions 87, 98, 29, 105, 138, 100 and 111. Text in italic is added to the report
7/31	Confidential SFI Notification Contracts with certification bodies are the only sources of information on applied requirements for certification bodies doing chain of custody certification.	Why is the content of such contracts confidential (this question refers also to chapter 9.2 – Notification)?	Publication of signed contracts is not a common practice. The SFI discloses a list of certification bodies that have signed the contract. The SFI Program does not describe the requirements for doing PEFC chain of custody certification, which is a gap in compliance. However,

Report chapter / page	Consultant's report statement	PoE member finding	Consultant's response
			the requirements are stated in the contracts and are thus implemented. No changes made.
8 / 31	In Canada the applicant shall have both certificates. In Canada PEFC Canada issues logo licenses if applicant has only a PEFC chain of custody certificate.	What do applicants in Canada need - max. one or both certificates? Why such a regulation? This is unclear.	Entities responsible for logo licensing are different in the US and Canada. SFI may not issue logo licenses in Canada if it is not based on SFI forest management certificates. Text was edited as follows: In Canada the applicant shall have both SFI forest management and PEFC chain of custody certificates ⁵ to be entitled to use the logo based on SFI certification. In Canada, PEFC Canada that is the national governing body and also governs the logo licensing in the country. It may issue logo licenses if applicant has only a PEFC chain of custody certificate.
8. p. 32	SFI should describe and make publicly available the documents regarding procedures and conditions on logo licensing and logo use. Currently companies are encouraged to contact the SFI's Office of Label Use and Licensing on the issue	This comment of the assessor is understandable and SFI should follow this proposal	Acknowledged
App.2, Table 1.	Content of the Table 1	The presence of Environmental Non-Governmental Organizations in the Management Task Group seems to be rather vague! – Should there be some explanations by the assessor, why this is so?	See Figure 5.1 p. 17 Forest Management Task Group was one of the SFI Task Groups with the mandate to draft the new standard proposal. The invitation to nominate representative to the Task Group was sent out to 240 different organizations. No organization willing and having the human capacity to participate was refused. NGOs in the group represent, among other,

⁵ Note that PEFC Canada is the governing body for PEFC logo licensing and PEFC endorsed CSA forest management certification.

Report chapter / page	Consultant's report statement	PoE member finding	Consultant's response
			the interests in wildlife, game and water protection and management. Their share is 20% of the Task Group.
			Decision of the standard is done by the SFI Board with six members (33%) representing environmental, four (22%) social, six (33%) economic interests. Two board members are from universities.
			The SFI has made reasonable effort to involve different interest groups in standard setting and the outcome is satisfactory.
			No change is made to the report.
Appendi x / 45	5.1.7: In private forests forest owners decide on inventories.	What does this mean – decision if they do inventories at all or that they can decide on the periodicity / intensity?	Explanation added: Legislation does not oblige private forest owners to carry out inventories, but SFI Program requires periodic monitoring of forest resources.
Appendi x / 75 and76	Requirement 5.4.7: Reference / explanations in the right column	The references / explanations listed do not clearly indicate that GM trees shall not be used. What does the explanation "Legal compliance PM 9.1. is naturally the bottom-line" mean? What is the content of PM 9.1 and why is it not listed in "reference to scheme documentation"?	The PM 9.1 is SFI requirement under the Objective 9 – Legal and Regulatory Compliance Performance Measure 9.1. Program Participants shall comply with applicable federal, provincial, state and local forestry and related social and environmental laws and regulations (SFI 2015–2019 Forest Management Standard – Section 2 under SFI 2015–2019 Standards and Rules).
			Following explanation added to the conclusion: SFI is committed to comply with PEFC rules on the use of GMO trees, the rules prohibit their use by certified entity. The US legislation strictly controls the research, testing and commercial cultivation of GMO trees. There are no permits for commercial

Report chapter / page	Consultant's report statement	PoE member finding	Consultant's response
			cultivation of GMO trees. SFI does not prohibit research on the sector.
Appendi x / 91	5.6.4: http://www.ilo.org/wcmsp5/groups/publi c/@ed_norm/@normes/document s/publication/wcms_100792.pdf	The link does not work.	The web address was valid when tested with Google search provider. The address has been corrected to <u>http://www.ilo.org/wcmsp5/groups/public/@ed_norm</u> /@normes/documents/publication/wcms_100792.pdf

Indufor Oy

Töölönkatu 11 A FI-00100 Helsinki FINLAND Tel. +358 9 684 0110 Fax +358 9 135 2552 indufor@indufor.fi www.indufor.fi

Indufor Asia Pacific Ltd

7th Floor, 55 Shortland St PO Box 105 039 Auckland City 1143 NEW ZEALAND Tel. +64 9 281 4750 Fax +64 9 281 4759 www.indufor-ap.com

Indufor Asia Pacific (Australia) Pty Ltd

PO Box 425, VIC 8009 Level 8, 276 Flinders Lane, Melbourne AUSTRALIA Tel. + 61 3 9639 1472

www.indufor-ap.com

Indufor North America LLC

PO Box 28085 Washington, DC 20038 USA 1875 Connecticut Avenue Northwest Washington, DC 20009 USA www.indufor-na.com

