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representing independent professional
loggers and the American Loggers Council

March 25, 2011

Climate Action Reserve
523 W. Sixth Street, Suite 428
Los Angeles, CA 90014

Dear Climate Action Reserve,

Thank you for the opportunity to provide comments on the Climate Action Reserve's (Reserve) white paper, *Examining Carbon Accounting and Sustainable Forestry Certification, Topic 4: Sustainable Forest Management Certification*. The Sustainable Forestry Initiative® (SFI), Inc. has reviewed the report and overall we are pleased to see that it lends support to the current protocol continuing to recognize the three credible US certification programs: the SFI® Program, the American Tree Farm System, and the Forest Stewardship Council. SFI Inc. agrees with this approach and encourages the Reserve to continue with this policy in order to maintain a program that is widely applicable and practical for landowners in the US.

SFI Inc. offers the following specific comments on the white paper:

- The report concludes that the current approach on the Forest Project Protocol meets the needs of the Reserve program. Thus, SFI Inc. agrees with the authors that adding any more requirements beyond the sustainability requirements and requirements in 3.9.2 of the Protocol will only increase project costs with little added benefit. SFI Inc. does not recommend adding additional requirements for forest projects as this will only increase costs for participants and reduce interest in the Reserve among forest landowners.
- The report notes certification standards *provide greater assurance of sustainable harvesting practices than the alternative options provided by the protocol (state or federal approval and monitoring or long-term plans or uneven age management practices)*. While SFI Inc. understands the need to have pathways of entry for all interested landowners into the program, SFI Inc. agrees with this conclusion and believes the Reserve Protocol will be stronger over the long-term if more specific criteria and processes exist for management activities and monitoring and verification for those landowners who choose to not be certified.
- SFI Inc. agrees with the report that the other programs researched, such as Ancient Forest Friendly, do not offer the same level of risk mitigation as the credible certification programs and should not be included in the Protocol.

Overall, SFI Inc. supports the conclusions in the report, as outlined above. However, the Appendix of this letter offers clarifications and comments in regards to the SFI program and how it addresses the risk factors described in the report.

I would be happy to discuss these comments or the SFI Program with you in more detail. Should you have questions or concerns, please do not hesitate to contact me directly at nadine.block@sfiprogram.org or 202-596-3456.

Sincerely,



Nadine Block
Senior Director, Government Outreach

Appendix

Process-based versus Performance-based Indicators

- While the report authors accurately describe the types of indicators and their distribution among the various standards, the comments regarding process-based indicators having “no detailed requirements as to what outcome should be sought” is subjective and requires clarification. Taken singularly, the indicators may be interpreted in this fashion. However, taken collectively and considering their role vis-a-vis the entire SFI Standard, these indicators support Performance Measures and Objectives which do describe the desired outcome.

Audit Process

- In Table 2, the description of stakeholder engagement in the certification audit process for SFI should more accurately reflect the language of the Standard. The Standard requires more than just “an assessment of concerns,” as stated in 5.3 of Section 9 of the SFI Standard:
Evidence shall be compiled by examining operating procedures, materials relating to forestry practices and on-the-ground field performance, and through meetings with employees, contractors and other third parties (e.g., government agencies, community groups, conservation organizations), as appropriate, to determine conformance to the SFI 2010-2014 Standard.
- On page 15 there is a discussion of audit time regarding the FSC Standard, but no information is given on the other Standards, such as SFI. Time spent on an audit is not necessarily an indicator of audit robustness. In the case of SFI, because major non-conformances found during a certification audit will result in a company not receiving a certificate, many companies choose to work with consultants extensively prior to certification to ensure their processes and implementation of the Standard are in place and working before initiating an audit. Thus, certification bodies may not need to spend as many days on SFI audits as with other certification program audits.

Review of Certification Comparison Reports

- SFI Inc. noted that the authors referred to the Yale Program on Forest Policy and Governance report created for the US Green Building Council. SFI Inc. has noted previously that this report is flawed and does not accurately describe any of the certification programs completely. SFI Inc. has extensive written comments on this report and is happy to share our comments, upon request by and directly with the report authors.
- The report notes that comparisons of standards “favor the more prescriptive standard because it is easier” overall to assess conformance to the standard requirements. There should be further clarification

explaining that simply because one standard is written differently, it is not automatically a more robust Standard.

Sustainable Harvest Levels

- In Table 5, the SFI requirements pertaining to “allowance for harvest in excess of calculated sustained yield” should refer to both Objectives 1 and 5 of the SFI Standard. As noted in other areas of the report, Objective 1 provides the requirements for calculating, monitoring and adjusting sustainable harvesting levels. Objective 5 limits clear cuts, but allows for harvesting on a greater scale *when necessary to respond to forest health emergencies or other natural catastrophes*.

Addressing Forest Project Risks

The following comments pertain to the findings of how SFI addresses the risks to sustainability as described in the report and Appendix 1. For the most part, the report focuses on risk in definitions related to definitions of “long-term” and “future forest state” in regards to the SFI Program.

- Long-term harvest levels: the SFI standard was designed to address the entire spectrum of forest management regimes (both forest type and desired forest products) in North America. Thus it is not practical to set a defined harvest level for all users of the Standard. Instead, Objective 1 in its entirety describes the process and activities a company must complete to define their management plans, harvest levels, modeling, monitoring and restructuring their harvest plans to ensure they meet all requirements of the Standard and that management decisions are based upon accurate information to maintain long-term productivity and yield. It is impractical to assume that a Standard designed for forest certification for all of North America would be able to define what “long-term” growth would be for all forest types.
- Desired future forest condition: Similarly to the comments above, a forest certification Standard cannot be expected to describe specific future forest conditions for all forest types in North America. The comment on page 31 regarding the SFI program may “insufficiently” define the future forest condition should be removed. As the appendix clearly states, Objectives 1-6, in addition to Objectives 15 and 17 all have requirements that must be met, outlined in the management plan, and adhered to. In creating the management plan as required in Objective 1, the forest manager will describe the future forest state for each stand, in order to meet the standard requirements, including wildlife habitat, water quality, soil productivity, special sites, and others.