SFIS 2015-1019 draft – Section 2: Forest Land Mgmt. & Primary Certif. Sourcing

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| Std. ref. | New? | SFI says… | MixedWood comments | MixedWood suggestion |
| 2.1.2 | new | *Where feasible* artificial reforestation within 2 years… | The term “Where feasible” makes this indicator essentially optional. How is feasible defined? Affordable? Physically possible? Legal? | Use “Clear criteria” language as in 2.1.3  |
| 2.1.4 | new | Should avoid risk on… | This language is meaningless and not auditable. | Require a specific risk assessment or drop |
| 2.2.5 | old | IPM *where feasible* | Another use of this unfortunate phrase. | IPM is a recognized and adaptable concept. It can be required without modification. |
| 2.2.7 | old | Use of management practices… | This indicator essentially repeats 2.2.5. IPM is – by definition – a range of site-appropriate management practices to minimize hazards and risks. | Combine 2.2.5 & 2.2.7 |
| 2.3.1 & 2.3.2 | new | Use appropriate methods… | Both indicators have essentially the same intended outcome. | Combine 2.3.1 & 2.3.2 |
| 3.1 | old | …meet or exceed BMP’s | This PM would be more effective (& more auditable) if, in addition to the monitoring requirement (Ind. 4) there was a specific requirement for implementing corrective action. | Consider new Ind. 5: implement CA when deficiency is identified |
| 4.1.4 | new | …are knowledgeable… | This phrase - used in several places – is essentially meaningless. How does an auditor verify that a company is knowledgeable? | Require a specific program or drop |
| 5.2.1 | old | clearcut harvest areas | This requirement is both ineffective and functionally meaningless.  | Require regionally-appropriate program standards, or simply drop |
| 5.3.1 & 3 | old | Green-up requirement | Indicator 1 & 3 are duplicative.  | Drop indicator 3 & rely on definition of green-up (Section 13) |
| 8.3.1 | new | Acknowlege an awareness… | This indicator is meaningless and impossible to audit | Substitute specific requirements or drop |
| 9.1.1 | new | Promotion of biological diversity utilizing information… | This indicator is extremely broad and vague.  | No good ideas - sorry |
| 9.1.2 | new | Program to address FECV | How does one “address” FECV? How will an auditor know whether FECV has or has not been addressed? | Consider requiring a specific risk-based analysis and management plan. |
| 10.1.2 | new | Use of written agreements…must include… | This new language is much less clear than the old standard. Are written agreements optional?  | Simplify and clarify |
| 10.1.3 | new | Program to address…shall clearly define… | This indicator combines 2 separate indicators from the old standard in a way that is less clear. | Separate the two requirements |
| 12.1.1 | new | …promotes conservation…using information from… | This is fuzzy and meaningless language. Impossible to audit and probably impractical to implement sincerely. | Reconsider this PM |
| 12.1.2 | old | Program…to promote… | This requirement remains vague and unclear.  | Reconsider this PM |
| 12.1.3 | new | Documented information that includes knowledge about… | This is very broad and vague. Is a PP expected to evaluate or take actions on this information?  | Reconsider this PM |
| 13.1.3 & 4 | new | Promote the principals…includes knowledge about… | These indicators repeat the poor language noted above in PM 12.1 | Reconsider these indicators |
| 13.1.1 & 14.1.1 | new | Process to assess risk… | These 2 indicators (in separate PM’s) both require a risk assessment associated with controversial sourcing. | Consider consolidating, using DDS principals. |
| 15.1 & 15.2 | old | Comply with… | Both PM’s include a requirement to comply with social laws | Consider consolidating PM’s to include all relevant areas of legal compliance. |
| 15.2.2 | old | …encompasses the intent… | This language remains vague and unclear | Consider clarifying this indicator |
| 16.1.2 | new | Research on… | This indicator appears to apply a requirement on researchers. Does it apply as well to support of research? How can it be verified by an auditor? | Consider clarifying this indicator: e.g. If supported research involves GM trees, provide evidence of… |
| 16.3.2 | old | …are knowledgeable… | This phrase - used in several places – is essentially meaningless. How does an auditor verify that a company is knowledgeable? | Require a specific program or drop |
| 17.1.5 | new | …shall have written agreements for the use of… | Written agreements with whom? The old standard required “…a program for the use of…” Is this different? How? | Clarify the intent. Consider re-using old language. |
| 17.218.118.218.3 | old | Various references to SIC programs | These PM’s – to a large extent – serve to define a number of programs and activities which are managed, not by PP’s, but by the SIC. All are essentially ensured by conformance to 18.1.1 | Consider separating SIC-specific requirements from the body of the standard. Can SIC programs be verified separately and the results made public? This would avoid auditing the same programs over and over. |