

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

Std. ref.	New?	SFI says...	MixedWood comments	MixedWood suggestion
2.1.2	new	<u>Where feasible</u> 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 <u>where feasible</u>	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	Acknowledge 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.
17.2 18.1 18.2 18.3	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.

