



The SFI 2022 Forest Certification Standards Select Issues Review

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I. Introduction

The Sustainable Forestry Initiative (SFI) recently updated its normative standards for the certification of forests, wood, paper, and other forest products. The updated SFI standards go into effect January 2022.¹

This review examines how effectively the 2022 SFI standards address topics of particular concern in the context of the climate and biodiversity crises and the need for effective and credible mechanisms for identifying forest products sourced from genuinely well-managed forests. This review also covers an additional subject (logger training) where the SFI has purportedly made “major enhancements.”² While these topics are not the only considerations for evaluating forest certification systems, they provide an instructive window into what can be expected from SFI-certified forests and products.

Forest certification is typically associated with assessments of forest management practices in specific source forests. In the SFI standards, this is covered by the SFI’s Forest Management (FM) Standard, which is applicable to forests in the United States and Canada. Here the review focuses on what the FM Standard does (and does not) require for forests to be SFI certified, in relation to:

- Climate Change and Climate Smart Forestry
- Biodiversity, Endangered Species, and “Forests with Exceptional Conservation Value”
- Old Growth, Intact Forest Landscapes, and Primary Forests
- Indigenous Rights and Free, Prior, Informed Consent
- Forest Conversion
- Fire Risk and Resilience
- Logger Training

Of note, other SFI standards are equally important, since the overwhelming majority of SFI labeled wood and paper products do not come from forests certified to the FM Standard, in spite of what buyers likely expect. Thus, this review also examines aspects of the SFI’s 2022 Fiber Sourcing Standard, 2022 Certified Sourcing Standard, and 2022 Rules for Use of SFI On-Product Labels. Among other things, these standards specify the requirements for use of the Certified Fiber Sourcing label, by far and away the most widely used SFI label. The Fiber and Certified Sourcing Standards also specify what wood and fiber – if any – must be excluded from SFI labelled products when it is not sourced from SFI FM certified forests, particularly from high-risk areas in North America and beyond.

Questions covered by this part of the review include whether different SFI labeled products:

- Require the use of wood and/or fiber from SFI FM certified forests.
- Exclude wood and fiber from ecological “red flag” areas including high carbon forests, old growth, Intact Forest Landscapes, threatened and endangered species’ habitats, and deforestation and other forest conversion.

¹ *SFI 2022 Standards and Rules*, April 15, 2021. Sustainable Forestry Initiative. Downloaded September, 2021. <https://www.forests.org/new-sfi-2022-standards-updates/>

² *Major Enhancements in the SFI Forest Management Standard Addresses Key Sustainability Challenges*, April 2021. *Major Enhancements in the SFI Fiber Sourcing Standard Address Key Sustainability Challenges*, April 2021. Sustainable Forestry Initiative. Downloaded September, 2021. <https://www.forests.org/new-sfi-2022-standards-updates/>

- Exclude wood and fiber from “red flag” social areas, such as where Indigenous Peoples or local communities’ rights have been violated.

The review is based primarily on desk analyses of the SFI standards’ “bottom-line” requirements for forestry companies and other certified organizations, namely the standards’ Performance Measures (PMs) and their associated Indicators. As with other certification systems, the SFI standard’s PMs and especially their Indicators are what auditors focus on when determining if forest management or other company practices comply with the standards.³ The review also considered the standards’ relevant Definitions, Guidance, and Polices, though as stated in the standards, the Guidance is “informative in nature and... should not be taken as normative.”

Overview of Findings:

The following is a brief overview of this report’s findings. More detailed summaries of findings are provided at the beginning of each of the following sections.

The SFI’s “Major Enhancements” documents imply that the SFI standards have undergone substantial improvements and represent a solution to the climate and biodiversity crises and other challenges. The reality is far different. In most cases, changes to the standards were incremental, often just clarifications, and not sufficient to correct serious problems with business-as-usual industrial forestry in North America and beyond. As a result, most previous criticisms that the SFI greenwashes environmentally and socially harmful forestry will continue to be relevant.

The revised SFI Forest Management (FM) Standard’s new climate related Objectives and Performance Measures (PMs) sound relatively good on the surface. However, their Indicators do not actually require meaningful actions to limit the climate impacts of intensive commercial forestry, or to adopt alternative practices that can reduce logging-related emissions and sequester and store more carbon. Rather, the Standard still allows the same widespread short-rotation clearcuts and other industrial practices that have reduced many forests’ carbon stocks to a fraction of natural levels and that keep them there. Nor does the Standard prohibit the logging of high carbon sites, including old growth and other primary forests, which results in substantial net greenhouse gas emissions. The Standard does not even require genuinely sustainable timber harvests (i.e., harvest rates that maintain net standing timber volumes), despite how timber volumes are a rough, partial metric for carbon stores. The Standard’s new language regarding forest resilience to climate change also focuses on productivity for wood and paper products, and ignores wildlife, ecosystems, and opportunities to restore forests’ natural resilience to change.

Similarly, the FM Standard’s requirements for biodiversity and endangered species remain highly inadequate, even for species and natural communities identified as “Forests with Exceptional Conservation Value” (FECV), despite the promises of the Standard’s higher-level language. Some imperiled species are still not protected by the Standard. And for those species that are covered by the Standard, its expectations continue to be loosely defined, including as “programs to protect” species, for which no particular outcomes are required, and which have previously been interpreted as allowing considerable harm to endangered species and their habitats. Meanwhile, the goal of recovering imperiled species and ecosystems is ignored, even in the context of public forests. The Standard’s

³ In turn, action verbs play a particularly important role within PMs and Indicators, and thus their choice of verbs can be crucial to the standards’ substance and rigor.

updated expectations for landscape level conservation also do not require meaningful outcomes in certified forests *per se*.

Old growth forests, Intact Forest Landscapes (IFLs), and other primary forests continue to receive no protection in the FM Standard. While PM 4.2 appears to protect old growth, the PM's sole Indicator requires no protection in certified forests, and only calls for companies to participate in vaguely defined regional-scale initiatives with no required outcomes. IFLs and other primary forests remain unrecognized and unprotected by the Standard, even within publicly-owned forests. The same is true of late successional forest stands that are valuable as carbon reserves and building blocks for restoring old growth in regions where it is now rare.

The FM Standard does not better recognize Indigenous Peoples' rights and how companies should communicate with Indigenous Peoples who may be affected by logging and other activities. However, the communication requirements are limited to situations where public lands are involved. The Standard's requirements for identifying and respecting the rights of Indigenous Peoples in connection with both public and private lands also remain murky, continue to suffer from fundamental gaps, both in terms of which rights are protected and which Indigenous Peoples are considered, and do not measure up to the international benchmark of "Free Prior Informed Consent" (FPIC).

Both forest ecosystem and land use conversions continue to be largely unregulated by the FM Standard's bottom-line requirements. As before, the Standard includes a set of purported safeguards and limits against ecosystem (or "cover type") conversion. However, the limits will often not be applicable, and are also open to wide interpretation and discretion. Thus, the Standard still mostly allows widespread conversion of relatively natural forests to ecologically-impooverished plantations and even exotic, non-native species. It also allows unfettered forest degradation and conversion to plantations when this does not change forest cover types *per se*. Nor does the Standard require or encourage existing plantations to be restored to more natural, working forest conditions. The Standard does not even limit the conversion of potentially large amounts of productive forestlands to other land uses, which is the least sustainable thing that can happen to a forested landscape.

The FM Standard's new Objective for fire resilience is timely, touches on important topics, and encourages use of prescribed and cultural fire in forest types where it can be important to the ecosystem, resilience, and reducing the risk of unnatural fires. However, the Standard does not otherwise require or encourage significant changes to industry practices that have reduced many forests' resilience to fire and contributed to climate changes that are driving more catastrophic fires. The Standard also doesn't distinguish between private and public forests, including where public forest management should differ from expectations for private industry lands.

While they have been reorganized and clarified, the FM Standard's requirements for logger training continue to have serious gaps. The role of logger training should also be kept in perspective; companies' basic and fundamental forest management decisions, including with regard to biodiversity conservation and climate change, are normally made by other employees and staff. Meanwhile, the Standard continues to fall short on other topics relevant to loggers and other workers, such as pay equity, protection from discrimination, and other fair labor practices

As weak as the SFI FM Standard is, most SFI labeled wood and paper products are not required to meet its expectations for addressing climate, biodiversity, and other environmental and social values. By far and away, most SFI products bear the SFI Certified Sourcing label – and such products are not required

to contain *any* wood or fiber from SFI FM certified forests. This is despite most consumers' natural tendencies to assume that certification labels represent products associated with certified forests.

Indeed, much as before, the SFI Certified Sourcing label – and the SFI Fiber Sourcing Standard on which it relies – reflects virtually no meaningful environmental or social safeguards beyond legal requirements. One of the Fiber Sourcing Standard's two primary Indicators for biodiversity and forest conservation simply requires companies to adopt a program that addresses one of four optional topics, none of which are coupled with any meaningful required outcomes. The other Indicator does now require that "Forests with Exceptional Conservation Value" (FECV) be addressed. However, this improvement is hamstrung both by the SFI standards' very narrow definition of FECV, which only covers a subset of imperiled species and rare ecological communities, and by the absence of clear requirements for FECVs to be protected in forests from which wood and fiber is sourced.

Most other ecological and social "red flag" forest values and management practices are not excluded by the Fiber Sourcing Standard. This includes but is not limited to high carbon forests, old growth, Intact Forest Landscapes, most threatened and endangered species' habitats, most deforestation and other forest conversion, and most areas where Indigenous Peoples' or local communities' rights are violated. While the Standard does require due diligence measures for species in decline, conversion, and Indigenous Peoples' rights, the measures' effectiveness is undercut by ill-defined thresholds for controversial sources and by a lack of objective, meaningful criteria to guide companies' risk assessments and mitigation measures. These are essentially the same requirements that thus far have allowed companies to treat *all* of North America as low risk for controversial sources, and to therefore adopt no mitigation measures for US and Canadian wood and fiber products carrying the Certified Sourcing label.

Many of the SFI standards' shortcomings can be traced back to gaps between the standards' lofty-sounding Objectives and PMs, and the Indicators that actually operationalize those higher-level statements. Sometimes the Indicators simply do not include requirements that correspond to the Objectives and PMs' statements. Often the Indicators are phrased in ways that do not require any particular outcomes in certified forests or supply chains. For example, at crucial junctures, the standards' Indicators often merely require companies to "address" a topic, which can mean virtually anything, even that the topic has simply been discussed in a company's management plan or other documents. Other crucial Indicators require companies to adopt programs or policies to conserve, protect, or otherwise cover a topic, but fail to specify meaningful required outcomes for these programs or policies, or are worded such that the existence of a program or policy becomes the focus, rather than their outcomes for certified forests and environmental and social values.

II. The SFI Forest Management Standard

Climate Change and Climate Smart Forestry:

The FM Standard's new climate related Objective 9 and PMs (PMs 9.1 and 9.2) sound good, and appear to address both how climate changes can impact forests, and how forest management can influence climate change.⁴ However, as is often the case with the SFI standards, these high-level expectations are not translated into concrete or sufficient requirements. Here the PMs' Indicators do not require meaningful actions regarding forest management's role in contributing to or mitigating climate change. The climate-related Indicators largely point back to the FM Standard's other requirements, which mostly do not limit the climate impacts of intensive commercial forestry,⁵ or require or encourage alternative practices that can reduce logging-related emissions and sequester and store more carbon. Rather, the rest of the Standard allows for the same widespread short-rotation clearcuts and other practices that have reduced many forests' carbon stocks to a fraction of natural levels and keep them there. The Standard also still does not prohibit the logging of high carbon sites in certified forests, including old growth and other primary forests, which results in substantial net greenhouse gas (GHG) emissions, even after accounting for regrowth. The Standard does not even require maintenance of net standing timber volume over time, as a rough proxy for carbon levels. Nor has the Standard been revised in other ways that can improve carbon sequestration over business-as-usual practices, such as increasing green tree retention in clearcuts or expanding stream buffers (an exception is new language that might protect some peatlands). Meanwhile, the Standard's language for forest resilience focuses on productivity for wood and paper products, and ignores the resilience of wildlife and ecosystems, as well as opportunities to restore forests' natural resilience with respect to climate change and other disturbances.

Thus, the most significant change to the Standard is that certified companies will now have to demonstrate they have considered the relationship between their forests and climate. Any actual, concrete improvements in companies' forest management relative to climate and carbon are discretionary. Forestry companies can even continue to reduce forests' carbon stocking and increase their GHG emissions, provided their climate programs "address" such outcomes.

The new PM 9.2 does call for companies to "identify and address opportunities to mitigate the effects associated with its forest operations on climate change." However, Indicator 9.2.1: points back to other existing requirements of the FM Standard; points to "other silvicultural or operational practices to enhance the climate benefits associated with the forest operations," which could be interpreted as anything, however inconsequential; and makes these actions optional, by framing them as examples. Indicator 9.2.3 calls on companies to "develop a program to identify and address greenhouse gas emissions within their operational control," but does not specify any particular outcomes or actions that must result from such programs, not even net emissions reductions. As written, 9.2.3 even allows companies to significantly reduce forest carbon stocking and increase GHG emissions.

⁴ PM 9.1 states: "...Organizations shall individually and/or through cooperative efforts... identify and address the climate change risks to forests and forest operations and develop appropriate adaptation objectives and strategies. Strategies are based on best scientific information." PM 9.2: "...Organizations shall individually and/or through cooperative efforts... identify and address opportunities to mitigate the effects associated with its forest operations on climate change."

⁵ See for example: *Clearcutting Our Carbon Accounts*. Center for Sustainable Economy & Geos Institute. 2015). *Climate of Destruction: Sierra Pacific Industries' Impact on Global Warming*. ForestEthics. 2017. *Pandora's Box: Clearcutting in the Canadian Boreal Unleashes Millions of Tons of Previously Uncounted Carbon Dioxide Emissions*. Natural Resources Defense Council. 2018.

The Guidance for Indicator 9.2.1 is also promising inasmuch as it calls for exploring “options for addressing stored carbon and greenhouse gas emissions.” However, beyond encouraging consideration of equipment age and size, 9.2.1 provides no direction for maintaining, much less restoring, more natural levels of forest carbon stocks, or for significantly reducing logging related emissions. The Standard’s Guidance is also advisory and not a requirement. Tellingly, Guidance elsewhere states that the Standard “...is not a carbon quantification protocol, *nor does it require Certified Organizations to additionally sequester carbon in managed forests*” (emphasis added).

The Standard also does not require that net timber stocking levels be maintained over time, despite language that purportedly requires “sustainable” harvest levels. Inasmuch as timber volumes are partial proxies for forest carbon, harvest levels that do not exceed timber growth levels, and that do not reduce net timber volume across management units, should help ensure no net loss of forest carbon. PM 1.1 does state that management plans are to include sustainable, long-term harvest levels, and Indicator 1.1.h calls for “recommended sustainable harvest levels,” with Indicator 1.1.2 requiring “current harvest levels” to fall within those recommendations. However, the Standard still does not define the term “sustainable” or provide other metrics for sustainable harvest levels, allowing certified companies to interpret the concept however they wish.

The new PM 9.1 and Indicators 9.1.2 and 9.2.2 do call for companies to plan for adaptation and to improve their forests’ resilience to climate change, which is important. Indicator 9.2.2 even calls for “identify[ing] and address[ing] opportunities to enhance ecosystem resilience.” However, as elsewhere in the Standard, virtually any outcome can be viewed as “addressing” the topic. And as with Indicator 9.1.2, the remainder of 9.2.2 largely focuses on silvicultural considerations for maintaining wood and fiber productivity, in pointing to other requirements in the Standard. Those requirements say nothing about maintaining and restoring older, more mature forest successional stages that both store more carbon and are more resilient to fires and other climate related impacts, or maintaining and restoring natural forest diversity and composition more generally. Nor do 9.1.1 or 9.2.2 acknowledge or address the changing needs of non-timber values in response to climate change. Depending on the forest, fish for example, may need more protective stream buffers and upland management practices to maintain water quality, while some imperiled wildlife may need additional habitats in new locations, as noted in one isolated sentence in the Standard’s non-mandatory Guidance.

In addition to directly requiring companies to reduce logging-related GHG emissions and to protect and restore more natural forest carbon levels, certification systems can also indirectly promote some of these outcomes. In some common forest types, using longer timber harvest rotations or harvest re-entry periods not only reduces impacts to watersheds and produces more timber volume over the long run, but also sequesters and stores more carbon, including in soils. Using larger, more protective buffer zones along streams and other water bodies not only helps water quality, fish, and other aquatic species, but can also begin to sequester and store more carbon, as can retaining more trees, snags, and other features in clearcuts and other types of logging units.

However, the SFI Standard mostly requires no such improvements, but instead continues to largely allow and endorse management down to regulatory minimums. PMs 5.2 and 5.3 and their Indicators continue to allow large clearcuts with virtually no retention, and do not prevent or discourage companies from using increasingly short harvest rotations. Entire watersheds can be logged within extremely short timeframes, perhaps even the same year. While Indicator 5.3.3’s green-up rules should normally spread out logging over at least three years in a given watershed, even this requirement may

be disregarded “as appropriate to address operational and economic considerations.” PM 2.3 and its Indicators for soils also do not directly address maintenance of soil carbon, and appear unlikely to enhance or restore soil carbon beyond *status quo* practices. Further, PM 7.1 and its sole Indicator encourage companies to remove “underutilized species and low-grade wood” for biomass. While there are times where such utilization can be reasonable in terms of forest management (e.g., in conjunction with ecologically appropriate thinning and fuels reduction), burning forest biomass for energy often has questionable carbon/climate benefits *per se*.⁶

One limited exception is in the context of state and provincial “Best Management Practices” (BMPs) for water quality. While PMs 3.1 and 3.2 and their Indicators do not require buffers for streams and other water bodies beyond *status quo* state forestry rules and BMPs, some states’ BMPs would otherwise be voluntary.⁷ A similar situation may exist in some provinces. In such cases, SFI representatives have previously argued that SFI certification represents an incremental environmental gain. However, this is not a new situation, as the Standard has required BMP compliance for many years.

The current update of the Standard did add peatlands to the values to be identified and protected per Indicator 4.1.6, when deemed “ecologically important.” This is noteworthy, as peatlands are often high carbon sites. However, the Standard provides no guidance and leaves it to companies’ discretion whether to consider any peatlands as ecologically important. Indeed, the SFI definition of “ecologically important” mostly just speaks to biodiversity, and ignores carbon and climate.

Guidance was also added to the Standard, encouraging (but not requiring) consideration of vehicle size and age. But otherwise, the Standard does not require or encourage practices that would reduce the use of fossil-fuel based equipment or applications of fertilizers that oxidize to greenhouse gases. While PM 2.2 and its Indicators call for chemical use to be minimized to levels needed to meet management objectives, those objectives can include use of short-rotation clearcuts and other fuel and chemical intensive practices. As such, the Standard’s approach does not reduce chemical use below levels already likely to occur, since companies will minimize usage to avoid unnecessary costs.

Biodiversity, Endangered Species, and “Forests with Exceptional Conservation Value:”

The SFI’s “Major Enhancements” document indicates that the FM Standard’s provisions for biodiversity conservation are now more clear and internally well-aligned, and the Standard’s high-level language at Objective 4 and its PMs do sound relatively good on the surface.⁸ However, the Standard’s bottom-line requirements for protecting and restoring biodiversity and endangered species remain highly inadequate, even for species and natural communities identified as “Forests with Exceptional Conservation Value” (FECV). Protections for FECVs and other threatened and endangered species and communities continue to be piece-meal and often discretionary, with some species and habitats likely to be overlooked, and with companies’ “programs to protect” FECVs and other species continuing to be

⁶ For example, see: *Land Use Strategies to Mitigate Climate Change in Carbon Dense Temperate Forests*. Law, B., et al. Proceedings of the National Academy of Sciences. April, 2018. *Think Wood Pellets are Green? Think Again*. Natural Resources Defense Council. May, 2015. <https://www.nrdc.org/sites/default/files/bioenergy-modelling-IB.pdf>.

⁷ For example, see *Protecting the Nation’s Water: State Forestry Agencies and Best Management Practices*. National Association of State Foresters. 2019. <https://www.stateforesters.org/bmps/>

⁸ PM 4.1 states: “...Organizations shall conserve biological diversity.” PM 4.2: “...Organizations shall protect threatened and endangered species, critically imperiled and imperiled species, and natural communities (Forests with Exceptional Conservation Values), and old-growth forests.”

loosely defined, with no required outcomes for species' populations and habitats. The Standard's updated expectations for landscape level conservation also do not require meaningful outcomes in certified forests *per se*. Meanwhile, the goal of recovering imperiled species and ecosystems is completely ignored, even in the context of public forests.

PM 4.1 and its Indicators, which were revised slightly from prior versions, do require consideration of some important landscape level information. However, Indicator 4.1.1 leaves the goals and outcomes of certified companies' landscape level conservation programs entirely at their discretion. Indicator 4.1.3's language about supporting a diversity of forest types and age classes also does not require maintaining and restoring a natural diversity and distribution of forest types and age classes. Equally important, 4.1.3 does not clearly require any such outcomes in certified forests *per se*. Rather, 4.1.3 ultimately just requires companies to explain how certified forests are part of a broader diversity of conditions. Indicator 4.1.4 takes a similar approach to considering regional conservation plans.

The Standard also still fails to require the maintenance and restoration of more natural forest composition and structure in certified forests, despite how this would benefit biodiversity at both landscape and stand levels. Indicator 4.1.2, for example, does not specify any level of retention of stand-level habitat features, but allows the least amount of retention for which companies can find professional justification. In practice, this is likely to mean the often-minimal amount of retention required by state and provincial forestry rules. Meanwhile, Indicator 4.1.8 merely requires "consideration" of "the role of natural disturbances, including opening size, structural retention, the use of prescribed or natural fire," and such – and does not call for any particular outcomes.

Similarly, the Standard's requirements for threatened and endangered species, "Forests with Exceptional Conservation Value" (FECVs), and "ecologically important" species, communities, and sites are little improved. Here, both PM 4.2 and PM 4.3 initially appear protective of imperiled species. PM 4.2, for example, states a seemingly clear expectation that certified companies "...shall protect threatened and endangered species, critically imperiled and imperiled species, and natural communities (Forests with Exceptional Conservation Values)...."

However, this expectation is not consistently or effectively reflected in the PM's Indicators. For species officially listed as threatened or endangered, such as the iconic woodland caribou, Indicator 4.2.1 merely requires a "program to protect" them, leaving the programs' components, goals, and outcomes to certified companies' discretion. There is no requirement to conduct surveys or otherwise identify the species' populations and habitats. The Standard's definition of "protect" leaves considerable room for interpretation and short-term harm, calling for "maintenance of the status or integrity, over the long term, of identified attributes or values... and considering historical disturbance patterns, fire risk and forest health when determining... strategies." Experience has also shown that the SFI and its auditors interpret "program to protect" as allowing companies to permanently eliminate substantial amounts of threatened and endangered species' habitats and populations in certified forests, in some cases all of the remaining habitats/populations.⁹

Indicator 4.2.2 and the Standard's FECV provisions also become increasingly narrow and unprotective, the closer one looks. The Standard defines FECVs as the subset of endangered species and ecological communities formally listed as "critically imperiled" (G1) or "imperiled" (G2). Relatively few species and

⁹ In the United States, this has been evident where companies have received far-reaching legal exemptions from the US Endangered Species Act.

communities have this status, since the “G” ratings are global in scale, and species such as caribou can be vulnerable, imperiled, or critically imperiled at the national, provincial, or state level yet still be deemed healthy at the global level. Indicator 4.2.2 also only covers “known sites... associated with viable occurrences,” meaning some species and communities’ occurrences will go unprotected, given that heretofore unlogged forests may not have been surveyed for them, and given other gaps in existing data sets. This is reinforced by Guidance that makes species surveys optional. The focus on “viable occurrences,” which the Guidance limits to only the most robust ones, may be especially problematic for species and communities most in need of safeguards and active recovery efforts. Finally, should a species or community achieve FECV status in a certified forest, Indicator 4.2.2 still only requires a vague “program to protect” them, with required outcomes no better defined than for other endangered species.

Many imperiled species and communities are not yet officially recognized by federal, state, or provincial officials as threatened or endangered, much less as G1 or G2.¹⁰ As with prior versions of the Standard, PM 4.3 and Indicator 4.1.5’s provisions for “ecologically important” sites and species begin to address such species, which is helpful. However, the Standard’s definition of “ecologically important” still allows certified companies to decide which species to address. This is reinforced by Guidance and Indicator 4.3.1, which affirm that companies are not required to survey for such species, but can rely on existing data sets. Indicator 4.3.2’s expectation for “appropriate... management” also does not require any particular, measurable outcomes for species and communities selected by certified companies. Similarly, Indicator 4.1.5’s requirement for a “program to address conservation of ecologically important species and natural communities” does not require any particular outcomes. The term “address” could even be interpreted as allowing harm to the species and communities.

Nowhere does the Standard require or even clearly encourage restoration of habitats and populations of rare and threatened species and their habitats, to help recover the species so that they will no longer be threatened and endangered. This is a crucial deficiency, given the large role that many SFI certified forests play in the ecological landscape in Canada and the United States, and how past intensive forest management has largely eliminated habitats and species from many SFI certified forests in the United States. The Standard does not even require or encourage such restoration in the context of public forests. Nor does the Standard require or encourage identification and suitable management of areas that will be important to imperiled species as they attempt to adapt to climate change.

Old Growth, Intact Forest Landscapes, and Primary Forests:

The updated FM Standard’s approach to old growth forests, Intact Forest Landscapes (IFLs), and other primary forests remains essentially unchanged. Old growth appears to be protected by PM 4.2, but a closer look at the PM’s Indicators reveals otherwise. Notably, IFLs and other primary forests are still unrecognized and unprotected. Also unrecognized and unprotected are late successional forest stands that can serve as building blocks for restoring old growth in regions where it is now rare. Meaningful

¹⁰ Examples of proposed federal listed and candidate species in the United States include some freshwater mussels and the gopher tortoise (which is noted in the Standard’s Guidance). Examples of species that are imperiled at the national (N) and state (S) level are numerous, and the same may also be true at provincial levels. In the United States, less than half of the N1, N2, S1, and S2 listed animals are listed as federally threatened or endangered, or as G1 or G2; examples in some states include Cope’s giant salamander, Southern torrent salamander, California spotted owl, peregrine falcon, white headed woodpecker, Lewis’ woodpecker, Northern goshawk, Northern flying squirrel, Canada lynx, and hundreds more (though note it is possible some may be listed as threatened or endangered by states requiring their protection).

protection of old growth, IFLs, and primary forests is also unlikely to result from other provisions in the Standard, such as its expectations for FECVs, endangered species, or diversity in successional stages.

The Standard continues to lack meaningful protections for old growth forests, much less requirements to increase their distribution towards more natural levels, including where they are rare and threatened. PM 4.2 clearly states that certified companies “shall protect... old growth forests.” However, the Standard’s sole indicator for old growth, 4.2.3, continues to only require “support of and participation in programs for the conservation of old-growth forests in the region of ownership or forest tenure.” There is no requirement to actually protect old growth in certified forests, not even in public forests, nor is restoration addressed. Of note, SFI certified logging of old growth at Fairy Creek in British Columbia recently sparked Canada’s largest-ever act of civil disobedience, as citizens attempted to block access to the stands. The Standard also does not address the scale question with old growth, potentially allowing companies to interpret “old growth forest” only as larger ecosystems, thereby ignoring many remaining occurrences, including small occurrences that can be valuable refugia, structural components in otherwise younger landscapes, and building blocks for restoration.

The Standard also lacks requirements to protect and restore late successional forests. Indeed, the term “late successional” never appears in the Standard. This is despite late successional forest stands’ importance as high carbon sites and future old growth stands.

Nor does the Standard protect Intact Forest Landscapes (IFLs) and other primary forests, or even recognize them – an omission that is especially relevant and egregious in the context of publicly-owned forests. IFLs and other primary forests are areas that have been largely untouched by intensive, industrial-era management, and are often biodiverse ecological refugia, high carbon sites, and benchmarks for truly natural and functional ecosystems. Many such areas also have important social and cultural values, including for Indigenous Peoples in Canada and elsewhere. They are now rare and sometimes threatened in the United States. While still more extensive in Canada, IFLs are threatened by logging in the managed forest zone.

It is unlikely that many, if any, old growth forests, late successional forests, IFLs, and primary forests will be protected as “Forests with Exceptional Conservation Value” (FECV). The Standard’s FECV provisions for ecological communities focus on those listed as G1 and G2, and virtually no forest or woodland ecosystems are so listed in the United States and Canada. Numerous forest and woodland ecological “associations” are listed as G1 and G2; however, these are very specific combinations of plant species, not listings of sites in different successional stages (e.g., old growth) or sites that have never been intensively managed. As noted above, the SFI FM Standard’s FECV provisions also leave effective protections at certified companies’ discretion, even if they do deem some old growth and other areas to be FECV.

Nor are old growth and late successional forests, or IFLs and primary forests, likely to be protected and restored via other provisions for biological diversity. While Objective 4 mentions successional stages, its PMs and Indicators do not require any specific outcomes, including for old growth and late successional stands. Indicator 4.1.3 calls for supporting a diversity of age classes, but does not require any particular age classes to be maintained or restored in certified forests. Rather, 4.1.3 ultimately just requires companies to explain how certified forests are part of a diversity of conditions across broader landscapes, as noted above.

The Standard's provisions for rare, threatened, and endangered species are also unlikely to consistently protect old growth and other areas providing habitat for these species. As discussed above, many imperiled species and their habitats are not protected by the Standard, particularly because of the Standard's focus on a narrow subset of such species, lack of survey requirements, and loose language that has been interpreted to allow for large legal exemptions for old growth-dependent species.

Indigenous Rights and Free, Prior, Informed Consent:

As noted in the SFI's "Major Enhancements" document, the revised FM Standard more explicitly recognizes Indigenous Peoples' rights and refines how companies should communicate with Indigenous Peoples who may be affected by logging and other activities on public forests. The Standard also acknowledges that Indigenous Peoples may have rights applicable to private forests, and acknowledges traditional rights and the UN Declaration on the Rights of Indigenous Peoples (UNDRIP). Yet the Standard's substantive requirements for identifying and respecting the rights of Indigenous Peoples regarding both public and private lands remain murky, continue to suffer from fundamental gaps, both in terms of which rights are protected and which Indigenous Peoples are considered, and do not measure up to the international benchmark of "Free Prior Informed Consent" (FPIC). Indeed, the Standard actually moved backwards in one way, with regards to Indigenous Peoples' land title rights in Canada.

As with prior versions of the SFI FM Standard, PM 8.1 clearly states that certified companies "...shall recognize and respect Indigenous Peoples' rights." However, its primary Indicator, 8.1.1, is framed as "develop[ing] and implement[ing] a... policy" that "acknowledge[s] a commitment to recognize and respect the rights of Indigenous Peoples" and that makes "reference to a program..." With its multiple vague phrases, the Indicator risks having auditors focus on the existence of a policy and "acknowledging a commitment" as the most clearly required outcomes, rather than whether certified companies' policies and programs sufficiently protect Indigenous Peoples' rights.

Indicator 8.1.1 does now call for companies' programs to "recogniz[e] the established framework of legal, customary, and traditional rights such as outlined in: i. [UNDRIP] ii. federal, provincial, and state laws and regulations; iii. treaties, agreements or other constructive arrangements..." This language is a step forward, inasmuch as the Standard previously did not go beyond requiring a policy. Yet even if auditors do examine these programs and their implementation, 8.1.1 leaves considerable room for interpretation. Neither the Indicator nor other elements of the Standard specify what "respecting" Indigenous rights means in practical terms. Nor does the Standard clarify whether "recognizing" established legal, customary, and traditional rights should be understood as respecting and protecting them, or just as identifying them. Likewise, 8.1.1's use of the phrase "such as" raises the question of whether any particular treaty, law, or UNDRIP will be viewed as mandatory, or just as an optional example.

The Standard also does not clearly require companies to respect Indigenous rights that are not recognized or sufficiently protected by existing laws. While 8.1.1 mentions "traditional" and "customary" rights, this is in the context of "established frameworks," which risks being interpreted as federal, state, and provincial legal frameworks. Likewise, while UNDRIP is mentioned, the Standard does not translate this broad, high-level document into any specific actions or outcomes. Most importantly, companies are not required to recognize and respect any rights identified by the affected Indigenous Peoples themselves, no matter how basic or established those rights might be. The non-mandatory

Guidance for 8.1.1 mirrors this situation, encouraging but not requiring companies to “understand and recognize established frameworks,” to reference UNDRIP, and to “investigate opportunities to implement aspects... that fall outside” legal requirements.

Even under generous interpretations of 8.1.1, the Standard never requires companies to secure Free Prior Informed Consent (FPIC) from Indigenous Peoples when planning or conducting activities affecting their rights. In this context, Indicator 8.1.1’s omission of court decisions from its list of applicable legal provisions is especially glaring. The Canadian Supreme Court’s *Tsilhqot’in* decision and its landmark affirmation of Aboriginal Title rights should be respected for all Indigenous People in Canada, not just the Tsilhqot’in. Here the Standard moved backwards, inasmuch as it no longer acknowledges *Tsilhqot’in* or other court decisions, unlike the Guidance in the 2015-2019 version of the Standard. The importance of court decisions for Indigenous Peoples’ rights is further exemplified by the British Columbia Supreme Court’s 2021 decision in *Yahey v British Columbia*. Under *Yahey*, any significant or meaningful reduction in First Nations’ ability to exercise their treaty rights is considered a treaty violation, including cumulative reductions from multiple government-authorized development projects.

There is also potential for some Indigenous Peoples to be completely excluded from certified companies’ considerations of Indigenous rights. The SFI’s definition of Indigenous Peoples is explicitly limited to members of federally recognized Native America Tribes in the United States, and to people recognized by Section 35(2) of the Constitution Act in Canada. In the United States, there are dozens of Tribes recognized by states but not the federal government, and many more that are neither federally nor state recognized. (The Canadian Constitution Act is more inclusive, recognizing First Nations, Inuit, and Métis peoples.)

While PM 8.2 and its sole Indicator have been clarified, they still only require communication with Indigenous Peoples in relation to public forests. Indicator 8.2.1 does not correct the gaps and uncertainties in PM 8.1’s Indicators; rather, its narrow scope may exacerbate those problems. Indicator 8.2.1 does not even mention rights, and its most relevant provision focuses narrowly on “spiritually, historically, or culturally important sites.” The Standard’s definition of “culturally important” further narrows the scope, focusing on cemeteries and sacred sites. Traditional land title, access to resources, and the condition of resources such as water, wildlife, medicinal plants, etc., are ignored, as is the concept of consent. Instead, Indicator 8.2.1’s most clearly required outcome is adoption of a “program” for communication with Indigenous Peoples recognized as holding applicable rights.

PM 8.3 does now recognize that Indigenous Peoples may have rights applicable to private forests. This is important, but also overdue, given that Indigenous Peoples’ traditional homelands surely encompassed the private forests certified by the SFI in the United States and Canada. Yet PM 8.3 merely encourages, rather than requires, communications with potentially affected Indigenous Peoples. Indigenous rights are also ignored by the PM’s two indicators, which merely expect companies to be “aware of traditional forest-related knowledge...” and to “respond to Indigenous Peoples’ inquiries and concerns....”

Forest Conversion:

The FM Standard’s approach to forest ecosystem conversion has evolved over time to include landscape assessments and some environmental safeguards. Yet the Standard still allows widespread conversion of relatively natural forests to ecologically-impoverished plantations and even exotic, non-native

species, provided the certified companies determine that a narrow set of ecological values will persist elsewhere in the landscape, and have “justified” any conversion that harms a few other values. The Standard also ignores and allows unfettered forest degradation and conversion to plantations that does not involve changing the forest cover type *per se*. And the Standard still completely fails to require or encourage existing plantations and converted areas to be restored to more natural conditions that are feasible in the context of productive, working forests, and that can have important biodiversity and climate benefits.

Equally important, the Standard continues to allow conversion of potentially large amounts of productive forestlands to other land uses, with no meaningful restrictions. Whether from a resource production or an ecological perspective, such conversion is arguably the least sustainable thing that can happen to a forested landscape.

Forest ecosystem conversion is governed by PM 1.2 and its two Indicators.¹¹ Indicator 1.2.1 allows for unlimited conversion unless it: converts “native forest cover types that are rare, ecologically important, or that put any native forest cover types at risk of becoming rare;” creates “significant adverse impacts on [FECV], old growth forests, forest critical to threatened and endangered species, or special sites or ecologically important non-forest eco-systems;” lacks “objectives for long-term outcomes that support maintaining native forest cover types..;” or is legally prohibited. These safeguards may sound robust, but will have limited benefit in practice. No surveys or other assessments are required to determine the presence of potentially threatened values, and companies operating on private lands are likely to claim that past management has already eliminated old growth, species listed as G1 and G2 (i.e., FECV), and other endangered species. (While this largely true, occasional site-specific occurrences of these values can still exist in commercially managed forests, e.g., on sites overlooked by past intensive logging.) The Standard also leaves broad latitude for companies to decide what impacts are “significant” and what is meant by “objectives for long-term outcomes,” even when sensitive ecological values are found. Meanwhile, forest cover type conversion is rarely legally prohibited, especially in private forests.

The subjectivity of the term “significant” in Indicator 1.2.1 will also be problematic where forests have been less affected by intensive industrial management, e.g., large portions of public forests in Canada and parts of the United States. Where old growth and other ecological values not yet rare, companies will likely argue that each conversion is not significant, despite how rarity can result from cumulative individual conversions.

By design, the Standard allows largely unregulated conversion where forest types are still widespread, e.g., especially in Canada but also in parts of the United States. But Guidance also states that even with a more limited and “ecologically important native forest cover type” such as “a bottomland hardwood stand,” conversion to “more economically justified” species like loblolly pine would be allowable “provided that such conversion would not put native forest cover types, or ...[FECV], at risk” of becoming rare. Equally important, the Standard does not define or provide metrics for rarity in the context of conversion, leaving this judgement entirely to the companies undertaking conversion.

PM 1.2 and its Indicators also completely ignore forest degradation, which can be equally harmful and is the more common threat to public forests, as well as many private forests. The PM and its Indicators only regulate forest cover type conversion, and drastic simplification of a forests’ natural diversity is

¹¹ PM 1.2 states: “...Organizations shall not convert one forest cover type to another forest cover type unless an assessment has been conducted to determine ecological impacts and provide appropriate justification.”

possible within the Standard’s definition of “native forest cover type,” provided the dominant tree species is unchanged. Neither the definition nor the rest of the Standard distinguish, for example, between relatively diverse natural forests in the Douglas fir region of the Western States and British Columbia, and forests largely reduced to nothing but Douglas fir. This is despite the immense scale at which such conversion has – and still could – occur in North America.

Landscape assessments are required per Indicator 1.2.2 – but not for the ecological values covered by Indicator 1.2.1. Rather, 1.2.2 assumes that compliance with 1.2.1 has been achieved, and focuses narrowly on factors such as forest health, site productivity, and undefined “ecological impacts... at the site and landscape scale.” Per Guidance, assessments need not be specific to any particular area being converted, but can be at regional or national scales, if commensurate with the size of a company’s land holdings, tenures, and certificates, and can also be broad, multi-company assessments.

Indicator 1.2.2 also calls for “appropriate consultation with local communities, Indigenous Peoples, and other stakeholders who could be affected....” The Standard’s Guidance provides little direction on what constitutes “appropriate” consultation, except to confirm that the consultation is essentially discretionary, since “... ‘appropriate consultation’ includes the possibility that circumstances... may not merit any consultation....” Indicator 1.2.2 also only requires companies to “consider” any consultation results, in the event that any consultation actually does occur.

Though minimal, the Standard’s protections for non-forest ecosystems may actually be somewhat better. PM 1.4 clearly prohibits conversion of other ecosystems to tree farms (i.e., afforestation) where it would “negatively impact ecologically important natural communities, threatened and endangered species, or native natural communities which could be at risk of becoming rare.” In turn, Indicator 1.4.1 requires an “evaluation” of the proposed conversion site relative to those values, while 1.4.2 prohibits afforestation if the evaluation finds a likelihood of negative harm.

The Standard completely fails to require or encourage existing plantations and converted areas to be restored to more natural conditions that are feasible in the context of productive, working forests. This is a serious oversight, especially for some regions in the United States, given large portions of the forest landscape that have undergone cover type conversions and degradation. The Standard’s PMs and Indicators ignore the topic. Guidance does reference the possibility of returning sites to their natural forest cover, but does not encourage it, and instead just acknowledges that such activities are not meant to be restricted as cover type conversions.

Meanwhile, the Standard continues to allow certified companies to convert potentially large amounts of productive forestlands to other land uses, with no meaningful restrictions. This is despite some certified companies (or their sister companies) having development-oriented land sales programs. The result can be a permanent loss of resource lands for wood and fiber production, habitats for fish and wildlife, open space, and other values.

Such land use conversions are governed by PM 1.3, whose sole Indicator only requires that companies “...shall not have within the scope of their certification to this SFI Standard, forest lands that have been converted to non-forest land use” and that “forest lands converted to other land uses shall not be certified to this SFI standard....” The Standard does not even address ecologically or socially important sites; rather, any land use conversion is simply to be excluded from the scope of the certificate. Guidance exacerbates this problem, by affirming “there is no limit on the percentage of land that can be scoped out of.... [a] certificate.”

Wood and fiber from scoped-out conversion sites is also still allowed in SFI labeled products, via the Standard's weak provisions for non-certified wood/fiber, including material that can bear the Certified Sourcing label (see below).

Fire Risk and Resilience:

The FM Standard's new Objective for fire resilience is timely, touches on some important topics, and encourages use of prescribed and cultural fire in forest types where it can be important to the ecosystem, resilience, and reducing the risk of unnatural fires. Guidance also begins to recognize the link between climate change and fire risk. Unfortunately, the Standard does not otherwise require or encourage significant changes to industry practices that have reduced many forests' resilience to fire and contributed to climate changes that are driving more catastrophic fires. The Standard also doesn't distinguish between private and public forests, including where management of National Forests in the United States, for example, should differ from minimum requirements for private industry lands. The bias towards industry lands and approaches is evident in Guidance stating that "when considering [wildfire related] management techniques... it is understood that these must be assessed in the context of economic viability."

The Objective's most pertinent PM, 10.1, states that certified companies "shall limit susceptibility to undesirable impacts of wildfire, promote healthy and resilient forest conditions..., and support restoration of forests following wildfire damage." This reasonable sounding language is open to broad interpretation by forest managers and auditors, and *status quo* practices could easily be found in compliance. The PM's three Indicators do little to change that. Indicator 10.1.1 simply calls for a "program to evaluate the risk of undesirable impacts of wildfire and the role of fire on the forests...." Indicator 10.1.2 calls for "stand and landscape level management... to promote forest health and resilience, and to mitigate the likelihood of undesirable impacts of wildfire...." And 10.1.3 calls for "...techniques to address wildfire damage, mitigate negative impacts to water and soils, and to promote forest restoration and future forest resilience."

Of positive note, Indicator 10.1.2 also lists "prescribed fire, cultural burning, thinning, or hazardous fuel reduction..." as optional examples of beneficial practices. (Loosely similar language can also be found in Indicator 4.1.8.) As noted in Guidance, prescribed and cultural fire is an important approach to improving resilience and reducing fire risk to more natural levels in a number of forest types. However, the suitability of thinning and fuels reduction also depends on the context and specific practices involved. Here the Standard fails to set any basic parameters, not even for National Forests and other public lands, where some thinning and fuels projects have been criticized for removing mature, fire-resistant trees, and for creating excessive openings that lead to drier, brushier, and more flammable conditions. Excessive biomass harvests also risk being framed as fuels-reduction by certified companies. Indeed, PM 7.1 and its sole Indicator encourage companies to remove "underutilized species and low-grade wood," without considering the habitat values of the removed material, limiting fuels removals to natural levels, or retaining larger trees and other fire-resistant stand components.

PM 10.1's Indicators also set no parameters for operations addressing wildfire damage or promoting restoration and resilience. Guidance for such restoration focuses primarily on salvage logging and replanting, along with guarding against erosion and invasive species. Aside from protecting threatened habitats, no limits on the scale, intensity, or ecological suitability of salvage logging are provided, not

even for public forests in the United States, where it is a controversial and sometimes unnecessary, damaging, and over-used practice, and where restoring natural ecosystem processes and conditions should be the focus.

Nor does the Standard require management for relatively natural forest diversity, structure, and age classes – all of which can help restore and maintain forests’ natural resilience to fire. Business-as-usual short-rotation plantations, for example, are entirely permissible under the Standard, despite their greater susceptibility to stand replacing fires.¹² As noted above, the Standard also does not require the protection and restoration of more fire-resilient old growth and late successional stands in certified forests – not even in public forests.

Logger Training:

The SFI “Major Enhancements” document indicates that the FM Standard’s provisions for logger training at PM 13.2 have been reorganized and clarified, which may improve some companies’ implementation of the Standard, as implied by the document. However, significant gaps remain in the Standard’s expectations for use of well-trained loggers. The role of logger training should also be kept in perspective; companies’ basic and fundamental forest management decisions, including with regard to biodiversity conservation and climate change, are normally made by other employees and staff. Meanwhile, the Standard continues to fall behind on other topics relevant to loggers and other workers, such as pay equity, protection from discrimination, and other fair labor practices.

The bulk of the Standard’s expectations for logger training are covered in PM 13.2 and its Indicators, which call for certified companies to support SFI committees that develop training programs. While there is possibly value to these programs, their more substantive requirements focus heavily on compliance with BMPs and existing forestry regulations. Use of trained loggers, other employees, and contractors is covered elsewhere, at PM 13.1 and its Indicators. While these Indicators require employees and contractors to be trained relative to the FM Standard, they only reference the Standard’s Objectives, which do not comprise the Standard’s substantive requirements. Indicator 13.1.4 also only expects “written agreements” for use of loggers trained per the programs in PM 13.2. Actual use of trained loggers by the companies or their contractors is not clearly required.¹³

The value of logger training should also be kept in perspective. Most fundamental forest management decisions – including how most of the FM Standard’s provisions are addressed – are not made by loggers *per se*, nor should they be. Rather, these decisions would normally be made by a company’s foresters, biologists, planners, and other experts and decision-makers. If decisions about the extent and nature of biodiversity protections and conservation areas, or climate change response strategies, for example, were left to employees and contractors whose primary responsibility (and source of income) is to cut and remove trees, this would suggest a serious failure to take such topics seriously. Nor are well-trained

¹² For example, see: *Severe Fire Weather and Intensive Forest Management Increase Fire Severity in a Multi-Ownership Landscape*. Zald, H., et al. *Ecological Applications*. 28; 2018. *Local Variability of Vegetation Structure Increases Resilience of Dry, Western U.S. Coniferous Forests to Wildfire*. Koontz, M., et al. *Ecology Letters*. 10 ; 2020. *Patterns of Fire Severity and Forest Conditions in the Western Klamath Mountains, California*. Odion, D., et al. *Conservation Biology*. 18; 2004. *Tamm Review: Reforestation for Resilience in Dry Western U.S. Forests*. Smith, M., et al. *Forest Ecology and Management*. 432; 2019.

¹³ The lack of clarity may be due to federal legal restrictions on what can be required of independent contractors.

loggers a substitute for environmental assessments, long-term forest management planning, and other processes.

The Standard's approach to other topics important to workers also remains minimal and incomplete. PM 11.2 merely expects certified companies to meet applicable social laws, and Indicator 11.2.1 only requires a "written policy demonstrating commitment to comply with social laws...." The Indicator does not recognize a breadth of potentially applicable laws, including laws covering equal employment opportunities, gender equality, anti-discrimination, and rights to organize. However, some jurisdictions' laws do not sufficiently recognize and protect such values, including for contractors. Nor does the existence of a policy mean that workers' rights are actually being protected. Indicator 11.2.2 begins to address these gaps, by stating that "forestry enterprises will respect the rights of workers... in a manner that encompasses the intent of the International Labor Organization (ILO) core conventions." But this language leaves considerable room for interpretation. The Standard's definition of "forestry enterprises" also excludes independent contractors, who may be a significant part of a company's in-the-woods workforce, and who may be most in need of protections.

III. SFI Fiber Sourcing, Certified Sourcing, and Associated Labelling

The SFI Fiber Sourcing and Certified Sourcing Standards specify requirements applying to virgin material that is not from SFI certified forests.¹⁴ If these requirements are met, the non-certified material can be mixed with material from certified forests or recycled sources and one of the Chain of Custody labels can be used. Likewise, if the requirements are met, use of the Certified Sourcing label on products made *entirely* from non-certified material is permitted. As with previous versions, these standards rely heavily on programs and systems rather than specific requirements designed to deliver concrete outcomes. The following analysis focuses on the Fiber Sourcing Standard. While the Fiber Sourcing Standard only directly applies to organizations that acquire logs or chips, it is also the basis of the Certified Sourcing Standard.

The SFI claims that “major enhancements” were made in four areas of the 2022 Fiber Sourcing Standard:

- 1) Forest Conservation
- 2) Due Diligence System Requirements
- 3) Logger Training
- 4) Cooperative Efforts Involving SFI Implementation Committees

Here we analyze the first three.

Forest Conservation:

Objective 1 of the Fiber Sourcing Standard is to “address the practice of sustainable forestry by conserving biological diversity” and its PMs address “promotion and conservation of biological diversity” (1.1) and of “Forests with Exceptional Conservation Value” (1.2). For PM 1.1, certified operations can fulfill the requirement by adopting a program that includes one or more of the following:

- 1) Promotion of biological diversity concepts utilizing information from a list of non-profit and government entities
- 2) Conducting landscape assessments
- 3) Involvement with local or regional conservation efforts
- 4) Use of relevant information from credible sources in training and education programs
- 5) Other credible approaches

The flexibility and latitude this language allows will be obvious to the reader.

For PM 1.2, the SFI defines Forests with Exceptional Conservation Value (FECVs) as critically imperiled and imperiled species and ecological communities. The SFI claims this PM for FECVs as a major enhancement, and it does represent an improvement in that it did not exist in the previous version of the Standard. However, as elsewhere in the SFI standards, the PM’s language is so broad and vague that it does not provide adequate assurances of responsible forestry. One Indicator requires that certified organizations conduct an assessment of FECVs within their supply areas and make a summary available to wood producers (though not also independent observers or the public). Another requires the development of a program to address FECVs through fiber sourcing activities “such as” use of “qualified

¹⁴ The SFI Fiber Sourcing, Certified Sourcing and Chain of Custody Standards all also accept material certified under the Forest Management Standards of certain other certification systems (the Canadian Standards Association and American Tree Farm System), some of whose requirements and rigor vary drastically.

logging professionals,” or a logger training program on how to recognize and protect FECVs, or through forest landowner outreach, or through SFI Implementation Committee involvement in the assessment of FEVCs and recommendations for conservation. A third Indicator requires organizations to conduct and incorporate the results of an FECV assessment to promote their conservation for purchased stumpage.

Though they are steps in the right direction, none of these requirements ensure that fiber comes from forests where management practices represent a meaningful improvement over business-as-usual forestry, nor are they sufficiently prescriptive to ensure significant positive outcomes. Indeed, none of the Indicators require companies to actually exclude wood or fiber from FECVs from their supply chains, and/or to ensure their suppliers actually protect FECVs.

Due Diligence System:

Objective 11 of the Fiber Sourcing Standard is to “avoid controversial sources” and this section is replicated in the Certified Sourcing and Chain of Custody Standards. The definition of controversial sources has been expanded and strengthened relative to the previous standards, which included only illegal sources and fiber sourced from areas without effective social laws. In addition to these, the 2022 definition includes references to habitat and species decline, conversion, labor and indigenous rights, conflict timber and GMOs.

However, there are important qualifiers that dilute the effectiveness of these provisions. For example, conversion sources are only considered controversial if they are in regions that are experiencing forest decline and declines in habitat and species protection are unacceptable only if they are occurring at a regional scale.

To avoid these controversial sources, organizations are required to gather information, conduct a risk assessment and have a program for mitigating risk, including by identifying controls that suppliers must put in place for high-risk sources. All this is standard for due diligence systems and is fine as far as it goes. The great weakness of the SFI’s approach, however, is that there are no objective requirements for, or definitive guidance on, determinations of risk or mitigation measures. Instead, it is up to each individual company to assess and determine risk and to decide how to control it. This creates problems on at least two levels:

- 1) It can lead to inconsistencies where one company finds that a source is low risk while another determines that the same source is high risk; or, where two companies both find a source is high risk, one may choose relatively stringent controls while the other chooses relatively lax ones.
- 2) More problematically, it is in the interest of companies to reduce their burden by classifying as low risk sources that most objective observers would deem controversial. In North America or elsewhere, this can include high carbon forests, old growth, Intact Forest Landscapes, threatened and endangered species habitats, and deforestation and other conversion, and other ecological “red flag” areas, as well as forests where Indigenous Peoples or local communities’ rights have been violated, and other social “red flag” areas. If past is prologue, then SFI companies will find that *all* of North America is low risk and thus risk mitigation measures will not be required.

Logger Training:

Objectives 3 and 6 of the Fiber Sourcing Standard relate to and support logger training in various ways. While there is nothing inherently wrong with the changes in the 2022 Standard over the previous version, the core problem remains that, ultimately, the centerpiece logger training requirement does not even have to apply to loggers. The Standard is so loosely written¹⁵ that, in practice, SFI auditors can look no further than an online list of suppliers, meaning truck drivers, foresters, wood brokers and others, who can be considered “qualified logging professionals” even though they may never actually harvest timber. This checks the box for auditing purposes but does not drive change on the ground.

SFI logger training allows mills to purchase from “trained loggers” whether they are doing quality work or not, which provides more volume to SFI certified mills, but decreases prices for those doing higher quality work. Applying BMPs and providing workers compensation insurance all come with a cost. But the laxity associated with gaining trained logger status provides cover for those who do not operate above board. The SFI’s logger training requirements also insulate the certified organization from the actual practices of the wood supplier, since a mill does not have to take responsibility for the supplier’s actions, despite touting logger training as an achievement in annual audits.

There is little evidence that the SFI’s logger training requirements do much to raise professional standards in the logging community, and in providing cover for lower quality operators, they might even have the opposite effect. It would be far more meaningful if there were independent verification of loggers’ practices at the point of harvest. “Certified logging companies” are mentioned more often in the revised standard than before, but whether SFI will truly embrace in-forest auditing of logging contractors has yet to be determined.

The Certified Sourcing Label:

One thing that has not changed in the 2022 SFI standards is the fundamental attributes of -- and problems associated with -- the SFI Certified Sourcing label. This label can be applied to any product made by a company that complies with either the Fiber Sourcing or Certified Sourcing Standard, which is to say that there is no requirement for labeled products to contain any material from forests certified to the SFI Forest Management (FM) Standard and/or recycled sources. This is explicitly stated in section 3.2 of the Rules for Use of SFI On-Product Labels and Off-Product Marks: “The SFI Certified Sourcing Label and claim do not make claims about certified content.” SFI is unique among international forest certification systems in this regard. Neither the Forest Stewardship Council (FSC) nor other national standards approved under the Programme for the Endorsement of Forest Certification (PEFC) allow their labels to be used in association with products that have no inputs from certified forests or recycled sources in their manufacture.

The SFI Certified Sourcing label is very nearly identical in appearance to the SFI’s Certified Chain of Custody labels, whose use actually does require some certified or recycled content. While there are subtle distinctions in the labels’ text, they are unlikely to be discerned by even professional buyers,

¹⁵ PM 3.1 specifies that SFI-certified organizations shall have a “program to promote the use of qualified logging professionals, qualified resource professionals, and/or certified logging companies where available.” (Emphasis added.) PM 3.2 says that certified organizations shall maximize the delivery of raw materials from such professionals or companies simply by maintaining a list and having written agreements with them.

much less the average consumer. This is fundamentally misleading: most people naturally assume there is a connection between products bearing a certification system's label and certified forests. The requirements of the Fiber Sourcing and Certified Sourcing Standards are even weaker than those of the FM Standard. Thus, it's unsurprising that the great majority (some estimates run as high as 90%) of SFI labeled products on the marketplace use the Certified Sourcing label.