



Meridian Institute

Connecting People to Solve Problems

**COMPARATIVE ANALYSIS OF THE FOREST
STEWARDSHIP COUNCIL[®] AND
SUSTAINABLE FORESTRY INITIATIVE[®]
CERTIFICATION PROGRAMS**

VOLUME I

**INTRODUCTION AND
CONSENSUS STATEMENT ON SALIENT
SIMILARITIES AND DIFFERENCES
BETWEEN THE TWO PROGRAMS**

**Based on Programmatic Material
Available as of June 2001**

October 2001

**COMPARATIVE ANALYSIS OF
THE FOREST STEWARDSHIP COUNCIL© AND
SUSTAINABLE FORESTRY INITIATIVE®
CERTIFICATION PROGRAMS**

Sponsored By

The Forest Stewardship Council–U.S.
The Home Depot
The Sustainable Forestry Initiative of the American Forest & Paper Association

October 2001



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ACRONYM LIST

AF&PA	American Forest & Paper Association
ANSI	American National Standards Institute
ATFS	American Tree Farm System
BMP	Best Management Practices
CSA	Canadian Standards Association
EA	Environmental Auditor
EMS	Environmental Management System
EMS-A	Environmental Management Systems Auditor
EMS-LA	Environmental Management Systems Lead Auditor
EPA	Environmental Protection Agency
E-PA	Environmental Auditor: Provisional
ERP	External Review Panel
FMP	Forest Monitoring Project
FSC	Forest Stewardship Council
FSC-US	Forest Stewardship Council U.S. Working Group
ISO	International Standards Organization
NAP	National Accreditation Program
NGO	Non-Governmental Organizations
P&C	Principles and Criteria
RAB	Registrar Accreditation Board
SFB	Sustainable Forestry Board
SFI	Sustainable Forestry Initiative
SIC	State Implementation Committees

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INTRODUCTION

Overview of the Report

This report is the result of the efforts of the “FSC/SFI Comparative Analysis Panel” that was established in December 2000 by the Meridian Institute at the request of The Home Depot Company, the Forest Stewardship Council U.S. Working Group (FSC-US), and the Sustainable Forestry Initiative (SFI) of the American Forest and Paper Association (AF&PA). These three sponsors jointly requested that the Meridian Institute convene and facilitate a balanced and diverse panel of experts to produce a factually accurate, consensus-based comparison of the FSC and SFI programs. The purpose of the report is to inform purchasers of wood and paper products, consumers, and the general public of the similarities and differences between these two programs, and to provide a basis for improving both programs in the future.

Terms of Reference

There are several important aspects of the “terms of reference” for this effort that are critically important to understanding information that is contained in this report.

1. The report was produced through an iterative and facilitated process of deliberation and consensus building that involved a carefully selected and balanced panel of experts. The Panel operated by consensus, which was defined as no dissent by any member of the group. The collective wisdom and experience of the Panel was used to identify and refine the program elements, topics, and questions that became the basis of this comparison, as well as the judgment that was necessary to achieve a consensus on how to best characterize the similarities and differences between these two rapidly evolving programs in the most factually accurate and concise manner possible. One of the ground rules of the process was not to resort to a “least common denominator” in achieving the goal of a consensus on a factually accurate and concise description of the similarities and differences between these two programs. *This report reflects the consensus views of the Panel.*
2. This Report is the result of a “paper analysis” of all relevant documents about the two programs, and the Panel believes it is a very important contribution to factual understanding about the origins, processes and requirements of the SFI and the FSC programs. It should fill many gaps in popular understanding of the two programs and remove many incorrect presumptions and myths about both of them. However, it is somewhat analogous to a “desk audit” rather than a “field audit” in a certification, and the Panel did not evaluate the effectiveness of each program on the ground. The Panel believes a full and complete understanding of all of the differences and similarities between these two programs and how they are interpreted in practice would be furthered by a similar field study comparison that is beyond the scope of this Panel.

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3. Similarly, this report does not attempt to evaluate the effectiveness of each program either independently of each other or in relation to each other. Rather, it attempts to objectively describe similarities and differences between these two programs in a comprehensive, yet succinct, and factually accurate manner. It is the intention of both the Panel and the Sponsors that readers determine for themselves what might be the significance, implications, or meaning of each similarity and difference, as well as the sum total of the similarities and differences.
4. Given the rapid evolution both programs are undergoing, this report should be considered a “snapshot in time.” The date when the Panel stopped considering new written information regarding the current status of the program elements that are the basis of this comparison was June 20, 2001. The Panel believes this comparison is therefore accurate only as of this date. Depending on the value that the primary intended audiences (which include purchasers of wood and paper, consumers, investors, the general public, forest landowners, and forest product manufacturers) attach to the content of this report, the Panel believes it would be helpful for the Sponsors to find an effective and efficient means to periodically update the contents of this report.

The Panel

The panel consisted of ten people, three of whom were selected by the FSC-US based on their in-depth knowledge and/or direct field experience with the FSC program, three of whom were selected by the AF&PA based on their in-depth knowledge and/or direct field experience with the SFI program, and four of whom were jointly selected by the Sponsors due to their broad knowledge and experience with sustainable forest management in general and/or their in-depth experience with both programs. All panelists were selected based on their ability to be fair and objective and to participate effectively in a consensus-based process.

The roles and responsibilities of the panel members were to:

- Attend and actively participate in Panel meetings;
- Review materials in advance of the meetings and come prepared to comment on draft outlines and draft and final versions of the comparative analysis;
- Work with other members of the Panel to develop consensus agreements without resorting to a consensus that can be characterized as a “least common denominator.”

Following is a list of the panelists and their titles, organizational affiliations, and an indication of how they were selected to participate. Appendix A of this volume of the report includes biographical information on each member of the Panel.

- Jane Difley, President/Forester, Society for the Protection of New Hampshire Forests (selected jointly by all three Sponsors)
- Jim Grace, State Forester, Commonwealth of Pennsylvania (selected jointly by all three Sponsors)
- Robert Hrubes, Senior Vice President, Scientific Certification Systems (selected by FSC-US)

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- Mike Jani, Vice President and Chief Forester, Mendocino Redwoods Company (selected by FSC-US)
- Lynn Jungwirth, Executive Director, The Watershed Center, Communities Committee, Seventh American Forest Congress (selected by FSC-US)
- John McMahan, Vice President, Timberlands External and Regulatory Affairs, Weyerhaeuser Company (selected by AF&PA)
- John McNulty, Vice President, Seven Islands Land Company (selected jointly by all three Sponsors)
- Carlton Owen, Manager, The Environmental Edge, LLC and Interim Acting Executive Director of the Sustainable Forestry Board (selected by AF&PA)
- Al Sample, President, Pinchot Institute for Conservation (selected jointly by all three Sponsors)
- Scott Wallinger, Senior Vice President, Westvaco Corporation (selected by AF&PA)

Tim Mealey, Heather Lair, and Shawn Walker of Meridian Institute served as the facilitators of the panel's deliberative efforts. As well, they produced some of the draft versions of this report and managed the process for making changes to the report in response to panel member comments. Staff from the two programs, which included Ken Cousins, Heather Melchior, and Jennie O'Connor from the FSC-US and Rick Cantrell, Mike Virga, and Brad Williams from the SFI program, among others, provided research support on the two programs to the panel.

The Process and the Product

The Panel met four times between February and June 2001. At the beginning of the process, each Panel member received a complete set of the source documents for both programs. These materials, which were organized in accordance with a preliminary list of program elements, included several hundred pages of material.

The Panel began its effort to achieve the goal of producing a factually accurate description of similarities and differences between these two programs by identifying the program elements that would form the basis of the comparison. At its first meeting the Panel tentatively identified six program elements, and a number of sub elements and questions for each sub element, that would provide what the Panel came to refer to as the "metrics" of the comparison. These six program elements, sub elements, and questions, which were refined in an iterative fashion during the course of the Panel's deliberations, form the basic outline for the remaining sections of this report. They include:

1. Program Mission, History, and Structure;
2. Standards;
3. Oversight of Certifying Bodies;
4. Mechanics of the Certification Process;
5. Control of Program Logo and/or Product Label and Supply Chain Verification; and
6. Status of Program Implementation and Participation.

The effort to summarize and synthesize the information contained in the source documents was accomplished through an iterative process that involved a dedicated group of staff from the FSC-

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US and AF&PA. At the direction of the Panel, the work of these staff assistants focused on summarizing and, where necessary, synthesizing information contained in the source documents in an effort to answer the questions posed by the Panel for each of the six program elements in a factually accurate, succinct, and non-promotional manner. When the Panel received early drafts of what came to be referred to as the “Program Description” documents, they used these drafts to both refine the questions they were asking (e.g., eliminating any redundancy to ensure critical program elements could be described once rather than multiple times) and as a basis for feedback to the program staff to improve the clarity and objectivity of the information. These documents are included in this report as Volumes II and III.

In addition to identifying and refining the program elements (and the topics and questions that provide a focal point for comparison within each program element), the process the Panel used to discern similarities and differences involved a series of steps starting with the question of whether each program addressed the program element explicitly, implicitly, or not at all. In the case of the fundamental program element pertaining to standards, the Panel identified a total of 31 issue areas that it felt were the most important points of comparison. For each of these issue areas, in addition to the question of whether the issue was addressed explicitly, implicitly, or not at all, panelists were asked to independently rate the degree of similarity and/or difference as to how the standards for each program addressed each issue area using a 1-5 scale that is described in more detail in Appendix B of Volume I. Each Panel member also shared their rationale for the 1-5 score, and the Panel then used these individual inputs as the basis for dialogue leading to the consensus views that are contained in this report.

Organization of the Report

The consensus conclusions of the Panel regarding the salient similarities and differences between these two programs are contained in Volume I of this report. Volumes II and III of this report contain the Program Description documents for the FSC and SFI program, respectively.

All three volumes of this report are organized in a manner that is consistent with the six program elements, sub elements, and questions that form the “metrics” for the Panel’s deliberations and conclusions.

The reader will note that for each of the six program elements there are a number of sub elements, and for each of these sub elements there are a series of questions. Volume I does not contain the answers to the questions per se but rather the Panel’s views about the salient similarities and/or differences between the programs in relation to these questions. If the reader is interested in the answers to these questions for one or both of the two programs, they will need to refer to Volumes II and III.

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SECTION 1. PROGRAM MISSION, HISTORY, AND STRUCTURE

DEFINITION: This section focuses on the overarching mission of each program, the history and chronology of its formation, and its organizational structure and governance mechanisms.

A. Mission and Purpose

What is the primary purpose and mission of the program?

- The mission and purpose of the two programs are similar to the extent that they both are aimed at advancing the overarching goal of improving forest management practices in the United States. The mission and purpose of the two programs differ due to differences in their underlying philosophy, as well as their respective histories and the evolution of the two programs over time.
- The FSC was established to encourage the forest products market to reward “exemplary” forest management through the labeling of forest products with a distinct logo that are independently determined to meet a predefined set of forest management and chain-of-custody standards. Its mission statement reads as follows:

“The Forest Stewardship Council shall promote environmentally appropriate, socially beneficial, and economically viable management of the world's forests.

- ✧ Environmentally appropriate forest management ensures that the harvest of timber and non-timber products maintains the forest's biodiversity, productivity, and ecological processes.
 - ✧ Socially beneficial forest management helps both local people and society at large to enjoy long-term benefits and also provides strong incentives to local people to sustain the forest resources and adhere to long-term management plans.
 - ✧ Economically viable forest management means that forest operations are structured and managed so as to be sufficiently profitable, without generating financial profit at the expense of the forest resource, the ecosystem, or affected communities. The tension between the need to generate adequate financial returns and the principles of responsible forest operations can be reduced through efforts to market forest products for their best value.”
- The SFI program was developed to visibly improve the forestry practices of the U.S. forest products industry and to promote sustainable forestry among private landowners in the United States. Its mission statement is:

“To meet the needs of the present without compromising the ability of future generations to meet their own needs by practicing a land stewardship ethic which integrates the reforestation, managing, growing, nurturing, and harvesting of trees for useful products with the conservation of soil, air and water quality, wildlife and fish habitat, and aesthetics.”

- The geographic scope of the programs differs in that:

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- ◇ The FSC is an international program supported by national initiatives to help assure regional responsiveness and relevance. In the United States, the national initiative is the FSC-U.S. As with other national initiatives, a defined and limited set of responsibilities are transferred to the FSC-US, while other responsibilities, such as establishing regional standards within the United States, must be approved by FSC International.
- ◇ The SFI program is primarily focused on the U.S.-based forest products companies, with growing participation from Canadian companies and other organizations.
- The structure of the standards utilized by the two programs differs in that:
 - ◇ The FSC has a separate set of standards and a separate process for obtaining forest management certifications and “chain-of-custody” certifications.
 - ◇ The SFI program addresses “wood procurement” as one of 11 objectives within the SFI standard rather than addressing it separately.
 - ◇ The FSC explicitly addresses social, economic, and environmental issues in its standards.
 - ◇ The SFI program focuses primarily on environmental standards and in several instances explicitly relies upon U.S. laws and regulations (e.g., through the reliance upon state-level Best Management Practice (BMP) regulations). While there is not an overarching statement to this effect in the SFI program documents, a fundamental premise of the SFI program is that social issues are addressed adequately by U.S. laws and regulations, and that marketplace competition is the most appropriate mechanism to address economic viability.

B. Program Genesis and Chronology

When and how did the program come into existence? What organizations and interests were instrumental in bringing the program into existence?

- Both programs came into existence in the early 1990s and claim derivation from seminal events in sustainability — the 1987 Brundtland Report and the 1992 Rio Summit — yet the programs differ in both their origins and evolution. (A detailed chronology of the evolution of these two programs can be found in Section 1.B of Volumes II and III of this report.)
- The SFI program was conceptualized and formed as an initiative of U.S. forest products companies through the AF&PA and its predecessor organizations. While private non-industrial forest landowners, logging professionals, consulting foresters, federal and state natural resource agencies, and environmental and other non-governmental organizations (NGOs) played a role in the development of the SFI program, the U.S. forest products industry led the effort to establish the program.
- The conceptualization and formation of FSC was largely, although not exclusively, an outgrowth of the efforts of environmental and social equity non-governmental organizations. While companies from the forest products and forest certification industries have been members of the FSC since its founding assembly, environmental and socially oriented NGOs led the effort to establish the FSC in advance of its founding assembly. Since the founding assembly, the FSC has been structured around three co equal chambers representing environmental, economic, and social interests.

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- Both programs have undergone evolution since their inception, and they continue to evolve in different ways and at a different pace since they were first established in the early 1990s:
 - ✧ Consistent with its philosophy of rewarding “exemplary” forest management practices, the FSC has always only allowed third-party certification of its standards as a condition for using the FSC logo as an on-product label. The FSC standards have remained largely unchanged since the establishment of the FSC. The FSC added a new principle to include “high conservation value forests” in the list of Principles and Criteria (P&C) that make up the FSC standards, and has made other modifications to clarify the meaning of other P&C. In the United States, the FSC is presently undergoing notable change through the development of nine separate sets of regional standards, which are based upon a set of national indicators. These regional standards will eventually replace the interim standards used by FSC-accredited certification bodies as a means of implementing the P&C (see Sections 2 and 3 for a further elaboration).
 - ✧ Consistent with its philosophy of continuous improvement, the SFI program has evolved from a set of five overarching principles that served as a voluntary “code of conduct” to now include an interrelated set of mandatory objectives and performance measures. Compliance with the SFI program was made a condition of membership in the AF&PA when the program was adopted in 1994. The SFI program also evolved from a program that began with first and second-party verification¹ of the SFI standard to later include a voluntary third-party certification component, coinciding with the addition of “core” and “other” verification indicators to the SFI standard (see Sections 2 and 3 for a further elaboration). A more recent and still evolving component of the SFI program relates to the use of a program logo and on-product label (see Section 5 for an elaboration of this point).

C. Legal Status

What is the legal status of the program? Is it an independent organization or a subsidiary or program within another organization?

- The SFI is a program of the AF&PA, a 501(c)(6) trade association. As described more fully in Section 5, the SFI service mark is owned and managed by the AF&PA.
- The FSC is registered in Mexico as an Asociación Civil (Spanish for “an association of -US, which is a “national initiative” of the FSC, is registered as a

¹ Under the SFI program, “first-party verification” is conducted by the entity whose operation is being verified by individuals with appropriate expertise and experience who are not directly accountable to those who are responsible for the operation being verified but work for the company seeking verification. “Second-party verification” is conducted by someone who is employed by an entity other than the company whose operation is being verified. Examples of second-party verifiers include forest products trade associations or customers. The SFI program uses the terms “third-party verification” and “third-party certification” interchangeably to refer to a verification/certification process that is conducted by an accredited individual or entity that is independent of the entity whose operation is being verified.

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501(c)(3) non-profit organization. As described more fully in Section 5, the FSC logo is owned and managed by the FSC International.²

D. Current Program Structure and Governance

How is the program structured? How are governance issues addressed (i.e., what subsidiary bodies are empowered to make decisions and what types of decisions are they empowered to make)? How has the structure evolved over time?

- The SFI is a program within a membership organization, the AF&PA. The SFI program staff are employed by the AF&PA. The Sustainable Forestry Board (SFB) – which was established in June 2000 – is a body that operates within the confines of the SFI program and the AF&PA legal “umbrella.”³ Starting with the date of its inception, the SFB is the body within the SFI program that is responsible for any modifications to the SFI standard and verification procedure. The SFB has an executive director, who is also currently employed by the AF&PA, but serves at the pleasure of the SFB.
- The FSC is a membership organization with three chambers representing environmental, economic, and social interests that operate at both the international and national levels. Each chamber has an equal voice in decision making. The FSC employs its own staff.
- The FSC has internalized the function of accrediting certifying bodies.
- The SFI program explicitly utilizes an external accreditation body and system that is managed by the American National Standards Institute (ANSI) and the Registrar Accreditation Board (RAB) and other equivalent organizations that are part of the International Standards Organization (ISO) system, and implicitly places responsibility on the firm seeking the certification services to ensure compliance with the additional requirements the SFI program has established for SFI “lead verifiers.”
- There is a difference in the relative influence industrial forest landowners have within the two programs, especially with regard to the manner in which standards have been established and will be modified in the future:
 - ✧ In the SFI program, AF&PA member companies initially established the SFI standards and, in consultation with the ERP, selected the original non-AF&PA members of the SFB, which, as noted above, as of the date of its inception (June 2000) is the body that is responsible for any modifications to the SFI standard. After the date of its inception, AF&PA will retain six (6) of the fifteen (15) seats on the SFB and the remaining nine (9) will be elected by the SFB as a whole.
 - ✧ The FSC consists of three chambers representing environmental, economic, and social interests. At the international level, these chambers are further divided into coequal sub chambers to represent the interests of the “north” and the “south” (i.e., developed and

² Throughout this report, the term “FSC” will be used to refer to the entire program, the term “FSC Internat” will be used when it is particularly important to refer to the legal entity that is registered as an Asociación Civil in Mexico, while the term FSC-US will be used to refer to the legal entity that serves as a national initiative of FSC and is incorporated in the United States as a non profit organization.

³ As of the June 20, 2001, cutoff date for this report, the AF&PA Board had discussed the possibility but had not yet decided to spin off the SFB as a separate non profit legal entity (May 23, 2001 Minutes of AF&PA Board).

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developing countries in each hemisphere).

- ✧ Thus, the interests of forest landowners in combination with other economic interests constitute one-third of the voting power in the FSC, or one-sixth of the voting power for forest management companies from the “north”⁴ in comparison to the much more prominent and influential role industrial forest landowners played in the early stages of development and ongoing evolution of the SFI program.

E. Membership/Participation

Elaborating on the description of the structure of the program, describe whether there are members or participants, and if so, who are the member/ participants? What are the membership/participation requirements? What are the rights of membership/participation?

- The SFI program has “program participants” rather than “members.” Two-thirds of the program participants are AF&PA member companies and one-third are organizations that are Program Licensees. Adherence to the SFI standard through first-, second-, or third-party verification is a condition of membership in the AF&PA. Membership in AF&PA is open to “any person, firm or corporation engaged in the business of growing trees and/or manufacturing pulp, paper, paperboard, wood or related products in the United States.” As such, SFI program participants include organizations that do not own forestland.
- The FSC is a membership organization. Anyone can be a member of the FSC, provided they are sponsored by at least two current FSC members, even organizations that do not own forestlands. Private companies that own forestlands and wish to become members of the FSC must join the economic chamber and make a formal commitment to the P&C. This commitment is demonstrated by obtaining a forest management and/or a chain-of-custody certificate and an agreement to have their entire forest property certified within a reasonable period of time.

F. Current Funding

How is the program funded and what is the current level of funding? What role do donors/funders play in decision making within the program? Is there a “firewall” between donors/funders and the program?

- Approximately 85% of the revenue to support FSC International activities comes from contributions from private foundations. The remaining 15% comes from membership and accreditation fees. The FSC-US receives 100% of the funding from grants from private foundations. Foundation resources also serve as a source of indirect support for the FSC through grants to environmental and social NGOs that actively support the FSC.
- Approximately 82% of the revenue to support SFI program activities comes from the dues paid by AF&PA member companies and through AF&PA member contributions to the State

⁴ While FSC members that have forest products-related economic interests must be a member of the economic chamber, there are forest landowners with non commercial holdings that are members of the environmental and social chambers.

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Implementation Committees (SIC). SIC-managed funds are generally targeted for specific state-level aspects of the SFI program such as logger training and landowner outreach. The remaining 18% comes from federal and state agencies, independent logging associations, grants, and revenue from meetings, publications, and the Licensee Program.

- Both programs receive significant in-kind support, primarily through time and resources donated by members, supporters, and program participants. In the case of the FSC, in-kind support is contributed by FSC member organizations, though large environmental NGOs (e.g., the World Wildlife Fund) are the principal contributors. In the case of the SFI program, in-kind support is primarily contributed by the members of the AF&PA.
- Due to the nature of the SFI program, the primary funders of the program – AF&PA member companies – have been intimately involved in and have had a major influence on the program’s initiation, design, and implementation.
- The role of the primary funders of the FSC program – private foundations – is more indirect but is no less important in the sense that FSC would not likely exist in its present form without the significant degree of support it has received from private foundations. Another example is that the costs associated with some of the acreage that has been certified under the FSC in the United States, especially state-owned forestlands, has been partially funded by private foundations. Private foundations are not prohibited from being members of the FSC, but none of the foundations that provide support are FSC members. According to its bylaws, the FSC will accept contributions from private foundations (and other sources) “as long as no restrictions are attached which would affect the independence or integrity of FSC.”

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SECTION 2. STANDARDS

DEFINITION: The requirements that are placed on forest management operations and/or forest product manufacturers who wish to have the operations certified (or verified in the case of the SFI program’s option for first- and second-party verification). The terms standard or standards are used to refer to the complete set of requirements at all levels of the hierarchy of standards for each program.

A. Overarching Purpose and Philosophy

What is the overarching purpose and philosophy of the standards?

FSC	SFI
<ul style="list-style-type: none"> ▪ FSC standards emerged out of a desire to provide market rewards through the labeling of forest products with a distinct logo derived from lands recognized for “exemplary” forest management. ▪ Under the FSC philosophy, “exemplary” refers to balancing of environmental protection, social responsibility, and acceptable business and forest practices. ▪ The FSC standards are oriented toward maintaining natural forests where they currently exist and support plantations where conversion to old growth is not involved. ▪ The standards are developed through a participatory process that involves input from environmental, business, and social sectors. ▪ The standards require a participatory process that includes inputs from stakeholders in the context of any particular certification. 	<ul style="list-style-type: none"> ▪ The purpose of the SFI program is to visibly raise the level of private forest management performance in the United States based on the underlying philosophy that “a rising tide floats ▪ The SFI program represents the forest industry’s commitment to the public to integrate the growing and harvesting of trees for useful products with the conservation of soil, air, water quality, wildlife and fish habitat, and aesthetic values. ▪ The SFI standard emphasizes responsible forest practices, continuous improvement, and monitoring and reporting of forest management performance. ▪ The development of the SFI standard has taken place within the forest industry, in consultation with non-industrial forest landowners, logging professionals, federal and state natural resource agencies, conservation groups, and other forestry experts, but is now the responsibility of the Sustainability Forestry Board. ▪ The SFI standard does not expressly address broader social and economic goals that are normally addressed via public law, regulation, and local custom in a developed country.

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B. Structure, Hierarchy, and Content

Are there different levels or types of standards going from the more general to the more specific, and, if so, how is the hierarchy of standards structured?

- Both programs have a tiered hierarchical structure to their standards that goes from the general to the specific. However, the programs use different terminology to describe different levels of the hierarchy.

SFI	FSC
<ul style="list-style-type: none"> ▪ 5 overarching Principles. ▪ 11 Objectives. ▪ 35 Performance Measures embedded within the 11 Objectives. ▪ 75 Core Verification Indicators and 158 Other Verification Indicators embedded within the Objectives and Performance Measures. 	<ul style="list-style-type: none"> ▪ 10 overarching Principles. ▪ 56 criteria embedded within the 10 Principles. ▪ 138 National Indicators (in the United States) embedded within the P&C that serve as a temporary guide to the development of Regional Standards in nine distinct regions within the United States. ▪ Interim Standards (internationally applicable) established and utilized by FSC-accredited certification bodies that are based on the P&C and used as the basis for certification until national or regional standards are ratified.

- As is true with the overarching structure of the program, the FSC standards have internationally applicable and nationally applicable components. The internationally applicable components of the FSC standard are the P&C. In the case of the United States, the nationally applicable components consist of a set of National Indicators Guidelines and nine distinct sets of regional standards that are still undergoing development.
- The SFI program and standard were designed for use in the United States, but they can be used in other countries. The SFI standard has been applied in Canada, and a pilot project is currently under way to apply the SFI standard in Honduras.

Which aspects of the standards are optional and which are mandatory?

- For the SFI program, conformance with the Principles, Objectives, and Performance Measures is a mandatory condition of membership within the AF&PA. They are required to be verified through a self-verification process, referred to as first-party verification. Third-party certification by an independent auditor is optional. It is also possible to use a “second-party” verification process, which is typically conducted by a customer. Core Verification Indicators are mandatory, whereas the “Other Verification Indicators,” which are intended to augment the Core Indicators or to address regional variations, are optional.
- The FSC program only permits third-party certification. The P&C and the interim standards of the accredited certifying bodies are mandatory. The National Indicators are intended to serve as a guide to the development of Regional Standards in the sense that any deviation from the National Indicators must be scientifically justified. Once the Regional Standards have been ratified by the FSC International Board and members, they will be mandatory.

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Within the structure, are there explicit standards for environmental performance, social performance, and economic performance, and, if so, what are the standards at each level of the hierarchy for each performance area?

To determine how the standards for each program address the three key content areas – environmental, social, and economic – the Panel identified a list of 31 issue areas and requested the programs to identify the standards that address each issue. Appendix C of Volume I contains the cross-references between the standards and the 31 issue areas. Appendix B of Volume I describes the process the Panel used to assess the degree to which each program’s standards addressed each issue (explicitly, implicitly, or not addressed) and the degree of similarity or difference in how each program addresses each issue. What follows is a summary of the Panel’s views on the salient similarities and differences that were uncovered through this process.

	Issue	Panel View on Salient Similarities and Differences in How the FSC and the SFI standards Address Key Issue Areas
ENVIRONMENTAL		
1	Special and Unique Forest Areas	<ul style="list-style-type: none"> ▪ Both programs explicitly address the protection of special and unique forest areas, but the breadth and scope of the particular attributes of special and unique forest areas that are explicitly referenced in each program differs. ▪ The SFI standard requires the identification and appropriate management of “sites of ecological, geologic, or historic significance.” ▪ The FSC standard requires the protection and annual monitoring of “high conservation value forest,” as well as “sites of special cultural, ecological, economic, or religious significance.” In the United States, the FSC requires the identification and prohibits active management of intact old growth forests and stands unless ecologically justified.
2	Use of Chemicals	<ul style="list-style-type: none"> ▪ Both programs explicitly address the use of chemicals and include provisions regarding responsible use, training, and legal compliance, but they differ in their overarching approach to use of chemicals. ▪ The FSC standard requires forest landowners to minimize the use of chemicals. ▪ The SFI standard allows prudent use of EPA-approved chemicals and requires research into projects to reduce chemical use rates and the development of enhanced practices via Integrated Pest Management.
3	Use of Genetically Modified Organisms	<ul style="list-style-type: none"> ▪ The programs take fundamentally different approaches to this issue. ▪ The SFI standard permits the use of genetically modified organisms in accordance with “sound scientific methods and appropriate federal and state regulation, and other internationally applicable protocols.” ▪ The FSC standard explicitly prohibits the use of genetically modified organisms.

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	Issue	Panel View on Salient Similarities and Differences in How the FSC and the SFI standards Address Key Issue Areas
4	Use and Management of Exotic Species	<ul style="list-style-type: none"> ▪ The SFI standard does not explicitly address the use of exotic species. ▪ The FSC standard allows the use of exotics under carefully controlled conditions and stresses responsible use and control.
5	Forest Plantations, Including Definition, Conversion of Natural Forests to Plantations, and Management	<ul style="list-style-type: none"> ▪ The programs take different approaches to the issue of plantations, stemming in part from different definitions. ▪ The SFI standard does not make explicit reference to plantations. However, a common definition in the United States for a plantation is “a stand composed primarily of trees established by planting or artificial seeding.”⁵ ▪ The FSC definition of plantations is narrower: “Forest areas lacking most of the principal characteristics and key elements of native ecosystems as defined by FSC-approved national and regional standards of forest stewardship, which result from human activities of either planting, sowing, or intensive silvicultural treatments.” ▪ With certain exceptions (FSC Principles 6 and 10), the FSC standard prohibits the conversion of natural forests to plantations (as defined above). Plantation forestry is potentially certifiable provided that natural forest conversion is limited, and other requirements pertaining to environmentally and socially responsible forestry are met. ▪ The SFI standard does not address the conversion of natural forests to plantations.
6	Sustained Yield	<ul style="list-style-type: none"> ▪ Both programs explicitly address sustained yield by requiring the determination of harvest levels that are sustainable in the long term. ▪ Both programs require that the calculated harvest level be consistent with appropriate growth and yield models and inventory information. ▪ Both programs require modification of the harvest level based on new growth and inventory information. ▪ The FSC standard requires harvest levels not to exceed levels that can be permanently sustained. In the United States, the National Indicators, which are being used as a minimum guide for developing regional standards, require harvest levels not to exceed average growth levels, measured over rolling 10 year time periods following attainment of balanced age-class distribution.
7	Water Quality and Riparian Zone Protection	<ul style="list-style-type: none"> ▪ The standards of the two programs regarding water quality and riparian zone protection are fundamentally the same. ▪ Both programs require riparian protection planning, implementation, and evaluation that are site specific and take into account soil type, topography, and vegetative cover.
8	Soil Protection	<ul style="list-style-type: none"> ▪ The standards of the two programs regarding soil protection are fundamentally the same. ▪ Both programs recognize soil as the fundamental foundation of forest productivity.

⁵ Society of American Foresters’ publication, *The Dictionary of Forestry*, 1998, John A. Helms, editor.

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	Issue	Panel View on Salient Similarities and Differences in How the FSC and the SFI standards Address Key Issue Areas
		<ul style="list-style-type: none"> ▪ Both programs require written policies for soil protection.
9	Forest Protection from Fire, Pathogens, and Disease	<ul style="list-style-type: none"> ▪ Both programs require similar protections of forests from fire, pathogens, and disease. ▪ The FSC standards are more prescriptive in how the protection should occur (i.e., integrated pest management).
10	Clear-Cutting and Even-Aged Management	<ul style="list-style-type: none"> ▪ Both programs explicitly address this issue, however they do so in a different manner. ▪ The SFI standard explicitly limits the average size of clear-cuts to 120 acres and includes “green-up” (replanting) requirements. The SFI standard does not explicitly address, and therefore permits, even-aged management while requiring the implementation of stand- and landscape-level measures that promote habitat diversity. ▪ The FSC standard explicitly addresses even-aged management by requiring “green retention” within even-aged units and requires the size of clear-cut units to mimic non-catastrophic natural disturbance regimes, and through the National Indicators that serve as a guide to the development of Regional Standards, sets a maximum clear-cut size of 40 acres for plantations unless otherwise scientifically justified.
11	Forest Regeneration and Reforestation	<ul style="list-style-type: none"> ▪ Both programs explicitly address this issue, however they do so in a different manner. ▪ The FSC standard strives to maintain natural forest attributes to the maximum extent possible and is explicit about the types of silvicultural methods to be used. In the case of plantations (as defined by the FSC), natural features must be retained in the landscape. The FSC standard expresses a preference for natural regeneration but accepts artificial regeneration if it contributes to diversity. ▪ The SFI standard places emphasis on early successful regeneration irrespective of the silvicultural methods employed.
12	Road Building and Maintenance	<ul style="list-style-type: none"> ▪ Both programs address the issue explicitly but differ in the extent to which they seek to minimize the extent of the road network. ▪ The SFI standard requires road construction BMPs to be followed by the landowner as well as outreach to loggers and contractors. It addresses the impacts of roads through reliance on state-level BMPs and requirements for soil and water quality protection. ▪ The FSC standard, due to its international orientation, does not rely upon state-level BMPs and instead includes explicit requirements for road building and maintenance. ▪ The FSC standard explicitly seeks to minimize the extent of the road network. ▪ The SFI standard does not explicitly seek to minimize the extent of the road network.

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	Issue	Panel View on Salient Similarities and Differences in How the FSC and the SFI standards Address Key Issue Areas
13	Maintenance and Conservation of Biological Diversity	<ul style="list-style-type: none"> ▪ Both programs explicitly address the maintenance and conservation of biological diversity, but they differ in level of detail, degree of prescriptiveness, and importance placed on their respective requirements, and the extent to which they require landowners to financially contribute to research on biological diversity. ▪ The FSC standard explicitly requires that “forest management <i>shall</i> conserve biological diversity and its associated values” and includes a detailed list of prescriptive requirements. ▪ The SFI program requires forest management operations to “<i>contribute to</i> the conservation of biological diversity,” and there are several core indicators that are linked to this Objective. ▪ The SFI standard requires program participants to contribute financially to SIC that in turn fund research and training on biological diversity conservation. ▪ The FSC does not require landowners to contribute financially to research and training on biological diversity conservation.
14	Maintenance of Ecological Function	<ul style="list-style-type: none"> ▪ Maintaining the ecological function of forests is explicitly addressed in the FSC standard through the inclusion of a detailed set of requirements for forest stand characteristics in relation to ecological function. ▪ The SFI standard does not explicitly address the “maintenance of the ecological function of forests.” While some of the component pieces of the concept (e.g., the contribution of forests to water and soil quality, wildlife conservation, etc.) are addressed explicitly in the SFI standard, there is no requirement for forest managers to take a holistic or integrated approach to the ecological function of forests.
15	Assessment of Environmental Impacts	<ul style="list-style-type: none"> ▪ The SFI standard does not explicitly require an assessment of environmental impacts. However, the SFI standard implicitly addresses many of the components of such an assessment through a requirement to plan for and promote wildlife habitat diversity and biodiversity at stand and landscape levels, water quality, and special areas protection within a context of comprehensive forest management planning. ▪ The FSC standard explicitly requires that an assessment of environmental impacts of the forest management operation be completed and adequately integrated into management systems, appropriate to the scale of operations, intensity of management, and uniqueness of the resources.

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	Issue	Panel View on Salient Similarities and Differences in How the FSC and the SFI standards Address Key Issue Areas
16	Periodic Monitoring of Environmental Conditions and Adaptive Management	<ul style="list-style-type: none"> ▪ Both programs include feedback loops that lie at the heart of the concept of adaptive management. ▪ The FSC explicitly requires periodic monitoring through annual audits, the results of which must be incorporated into the management plan; a public summary of monitoring results must be made available. ▪ The SFI standard, under the objective that promotes continuous improvement, requires monitoring, measuring, and annual reporting of performance in achieving the commitment to sustainable forestry. However, the SFI program does not require annual audits of certificate holders.
SOCIAL		
17	Consultation and Public Reporting Between Forest Managers and Key Stakeholders Groups and the Surrounding Communities	<ul style="list-style-type: none"> ▪ Both programs explicitly address public reporting, but they differ in the level and extent of their reporting requirements and the extent to which landowners seeking to be certified must consult with key stakeholder groups and the surrounding community. ▪ The FSC explicitly requires consultation and public reporting by the landowner to all interested parties as a part of ongoing management, including but not limited to consultation with key stakeholders in the surrounding communities. ▪ The SFI standard requires individual companies to report annually to the AF&PA, which then leads to the public issuance of an aggregated annual progress report for the SFI program. ▪ The SFI standard does not require landowners to consult with key stakeholders in the surrounding community, but it does require landowner consultation with state regulators regarding protection of riparian zones and special sites. ▪ The SFI program (as distinguished from an explicit requirement of a landowner seeking to be certified under the SFI standard) conducts a biannual forum with logging professionals, non-industrial private landowners, and other stakeholder organizations to monitor progress toward SFI program goals. SFI program state implementation committees also consult with a range of key stakeholders and support mechanisms for public outreach, education, and involvement.
18	Health, Safety and General Welfare of Employees and Contractors	<ul style="list-style-type: none"> ▪ The SFI standard does not address the general welfare of employees and contractors but implicitly relies upon state and federal labor laws and regulations to address this issue. ▪ The FSC standard explicitly addresses the general welfare and financial benefits accruing to employees and contractors (e.g., by requiring compensation relative to regional norms, rights to organize, and opportunities to participate in management decisions).

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19	Compliance with Applicable Laws and Regulations	<ul style="list-style-type: none"> ▪ The FSC standard has a specific principle that mandates compliance with all applicable laws, regulations, and binding international agreements. ▪ The SFI standard does not have an explicit principle regarding compliance with laws and regulations, but certain performance measures explicitly require compliance with specific U.S. laws and regulations (e.g., the requirement to adhere to state-level BMPs).
20	Recognition of Indigenous Peoples' Rights	<ul style="list-style-type: none"> ▪ The SFI standard does not address this issue. ▪ The FSC standard has an explicit principle recognizing the rights of indigenous peoples.
21	Identification and Protection of Cultural, Archeological, and Historic Resources/Sites	<ul style="list-style-type: none"> ▪ Both programs require the protection of archeological, cultural, and historic resources and sites. ▪ The FSC standard requires consultations with indigenous peoples on the protection of archeological and cultural sites and, in general, places greater emphasis on the protection of culturally sensitive sites than does the SFI standard.
22	Visual Impacts and Aesthetics	<ul style="list-style-type: none"> ▪ The SFI standard has a specific objective and related performance measure that require aesthetic considerations to be incorporated in harvesting, road, and landing design and management and other activities where visual impacts are a concern. ▪ The FSC standard does not have an explicit requirement that addresses visual impacts and aesthetics; however, the interim standards of the FSC-accredited certifying bodies do explicitly address visual impacts and aesthetics.
23	Education and Outreach	<ul style="list-style-type: none"> ▪ Both programs explicitly address education and outreach, but they differ with regard to the extent of emphasis they place on this subject. ▪ The SFI standard requires comprehensive training of logging professionals and company personnel and broad outreach to non-industrial forest landowners on a range of subjects (e.g., safety, BMPs, forest management, and regeneration). ▪ The FSC explicitly requires a commitment to ongoing employee education and training. In addition, managers of certified forests are expected to publicly advocate for exemplary forest management.

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24	Forest Management Research	<ul style="list-style-type: none"> ▪ The SFI standard places significant emphasis on research, requiring program participants to financially contribute to and incorporate the results of forest management research into their operations. The specific topics for which research will be conducted include water quality, wildlife habitat, carbon sequestration, and the health, productivity, and management of forests. ▪ The FSC does not require landowners to financially contribute to forest management research. The FSC does explicitly require active monitoring and assessment that may be viewed as a facet of research and development. Generally, the FSC requirements for research are focused on the identification of the indicators used in monitoring and assessment or use of research from external sources.
25	Public Access and Use Opportunities	<ul style="list-style-type: none"> ▪ Both programs address recreational use of forestlands. ▪ The SFI standard requires landowners to provide opportunities for recreational and educational use “consistent with forest management ▪ The FSC requires the landowner to accommodate clearly established “traditional and customary use” by local citizens “consistent with conservation of forest resources and the objectives of the management plan.”
26	Assessment of Social Impacts	<ul style="list-style-type: none"> ▪ The FSC requires periodic assessment of the social impacts of the forest operation. ▪ The SFI standard does not require such an assessment.
27	Contribution of Socioeconomic Benefits to Local Community/ Region	<ul style="list-style-type: none"> ▪ The FSC explicitly requires forest management operations to provide for a wide range of social benefits, with an emphasis on local benefits. ▪ The SFI standard does not explicitly require forest management operations to contribute socio-economic benefits to the local community. Although it is not stated explicitly in SFI program documents, an underlying premise of the SFI program is that the continued profitability of the industry will lead to the contribution of socioeconomic benefits by SFI program participants to local communities and regions.
ECONOMIC AND OPERATIONAL		
28	Long-Term Financial Viability of the Forest Operation	<ul style="list-style-type: none"> ▪ The FSC explicitly requires an assessment of the economic viability of forest management operations to ensure their long-term ability to comply with the FSC standards. ▪ The SFI standard does not require an assessment of the financial viability of forest management operations. The SFI standard does require program participants to use sustainable forestry practices that are economically and environmentally responsible.

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	Issue	Panel View on Salient Similarities and Differences in How the FSC and the SFI standards Address Key Issue Areas
29	Efficiency of Resource Utilization	<ul style="list-style-type: none"> ▪ Both programs explicitly address this issue in a similar manner. ▪ Both programs require certificate holders to implement practices that minimize waste associated with harvesting and processing operations.
30	Competency and Adequacy of the Forest Management Staff	<ul style="list-style-type: none"> ▪ The FSC explicitly requires an assessment of the competency and adequacy of the forest management staff. ▪ The SFI standard explicitly requires training of personnel who carry out forest management policy and practices but does not explicitly require an assessment of competency.
31	Management Planning Framework	<ul style="list-style-type: none"> ▪ The SFI standard requires plans, programs, and policies for all objectives and core indicators contained within the SFI standard for which a plan is appropriate. ▪ The FSC requires a management plan to be completed and specifies a detailed list of the required contents of the plan, as well as the requirement for a summary of the plan to be made publicly available.

C. Process for Standard Setting and Decision Making

Who decides what the standards will be? What is the standards-setting process? Does it differ at different levels of the hierarchy, and, if so, how? How are the standards updated? How do stakeholders participate in the standard-setting process?

- Within the SFI program, ultimate authority for program approval and implementation rests with the AF&PA Board of Directors and its member companies, but changes to the SFI standard and verification process (i.e., those programmatic features set forth in SFI 2000, 2001, 2002, and 2003, but *not* SFI 2004 (Requirements for On-Product Label Use)) are the responsibility of the SFB.
- The SFI standards were originally established by the AF&PA in collaboration with private non-industrial landowners, logging professionals, consulting foresters, federal and state natural resource agencies, and environmental and other NGOs. As of July 2000, the date that the SFB was established, changes to the SFI standard and verification process were shifted to the SFB. The SFB operates by consensus, but if a vote is needed, modification of the SFI standard is achieved through a two-thirds vote of the SFB. Changes to the SFI standard are accomplished in consultation with the ERP and after stakeholder input has been received through an open public comment period.
- The AF&PA Board, with advice from the ERP, initially selected the individuals who serve on the SFB. AF&PA member company representatives fill six of fifteen seats on the SFB. Individuals representing diverse interest groups fill the remaining nine seats. According to its bylaws, upon the creation of the SFB in July 2000, changes to the SFB membership are made by a two-thirds majority vote of the SFB.
- With the FSC, ultimate authority for modifications to the FSC standard resides with the members and the FSC International Board of Directors. Currently, the FSC International Board of Directors does not include representation from the United States. Members are

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required to affiliate with one of three “chambers” – the environmental, social, or economic chambers – each of which has one-third of the voting power in matters over which the membership has authority. Furthermore, at the international level, each chamber is divided into two subchambers, “Northern” and “Southern” Hemisphere, which represent the interests of developed and developing countries, each of which possesses 50% of the voting power within a chamber. Additionally, the FSC-US allows accredited certifiers to serve on its Board as *ex officio* members.

- The FSC has different mechanisms for establishing and modifying standards at different levels of the FSC hierarchy (e.g., through the accreditation of certifying bodies for the Interim Standards and through votes taken at the General Assembly of the FSC for any changes to the P&C). In general, any modifications to the FSC standard must follow an explicit consultation procedure and require broad stakeholder outreach that goes beyond FSC members.
- There is a significant difference between the programs in the degree of influence those who own and manage forestlands have in setting and modifying the standards. In the case of the FSC, forest landowners are members of the economic chamber that has one-third of the decision-making power regarding changes to the FSC Principles & Criteria and ratification of the regional standards that are under development in the United States. In addition to forest landowners, the economic chamber includes retailers, certifiers, consultants, and assigned NGOs with economic interests. Taking into consideration the North/South split within the chambers, forest landowners from the North (such as those who are members of the AF&PA) have less than one-sixth of the voting power with regard to changes to the FSC standards. In addition, the FSC International Board includes only one of nine representatives from economic interests from the North, and the person who fills this seat may or may not be from a forest products company. In comparison, under the SFI program, AF&PA member companies initially had a leading role in establishing the SFI standard, and will play a significant, yet minority role in future modifications to the SFI standard resulting from the fact that the AF&PA Board selects six of the fifteen members (approximately 40%) of the SFB.
- The SFI program receives stakeholder input into its standards and procedures via the SFB and ERP during public comment periods that are published by the SFB when it considers changes in the SFI. The FSC-US employs extensive public consultations in its national and regional standards development procedures, augmented by the processes of the international General Assembly to obtain broad stakeholder involvement. Ultimately, the FSC International Board of Directors decides the final content of all FSC standards.

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SECTION 3. OVERSIGHT OF CERTIFYING BODIES⁶

DEFINITION: Oversight of certifying bodies refers to the process by which entities and/or individuals are determined to be qualified to conduct third-party certifications under each program.

A. Basic Approach

What is the approach to oversight of third-party certifying bodies? Is accreditation required or optional? Who serves as the oversight body, and what is the makeup of the oversight body?

- The FSC program oversees the work of certifying bodies through an internal accreditation process. The FSC International Board of Directors serves as the oversight body for the accreditation of certifying bodies. The FSC program requires the accreditation of certifying bodies but does not require the accreditation of lead auditors.
- The SFI program handles the oversight of certifying bodies and lead auditors through a combination of external and internal mechanisms that in some instances are explicit and in others instances are implicit features of the program.
 - ◇ The explicit external mechanism is that the SFI program requires the “lead verifier”⁷ to be certified⁸ by the RAB in one of four possible “grades” (i.e., professional levels) of environmental auditor under the ISO-14001 Environmental Management System (EMS) standard. It is optional under the SFI program for auditing firms that provide certification services to be accredited to provide ISO-14001 EMS certification services, but at a minimum, the lead verifier must be RAB certified. In the United States, the National Accreditation Program (NAP), which is a joint program of the ANSI and RAB, serves as the accrediting body for firms seeking to perform ISO-14001 EMS certification services. One of the requirements for obtaining ANSI-RAB/NAP accreditation as a firm is having personnel who are RAB certified.
 - ◇ An additional explicit feature, which is “internal” to the SFI program in the sense that it does not rely on an entity outside of the SFI program for its implementation, is the specification and utilization of a set of qualifications for what are referred to under the SFI program as “lead verifiers.” These go beyond RAB certification and are intended to address the fact that the SFI program is a forest management certification program, not an EMS certification program. The SFI documents do not explicitly define who makes this determination.

⁶ Given the nature of the subject matter, this section only addresses the third-party certification component of the SFI program (i.e., it does not address the first- and second-party verification components of the SFI program).

⁷ This document uses the term “lead auditor” generically. The SFI program, and therefore this document, refers to lead auditors working with the SFI program as “lead verifiers” given the additional SFI requirements for RAB-certified lead auditors.

⁸ RAB refers to the accreditation of lead verifiers as “certification.”

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Which aspects of forestry operations are covered through the accreditation process (e.g., forest management, chain-of-custody, or both)?

- The FSC accreditation process accredits firms to serve as a certifying body for forest management and/or chain-of-custody certifications.
- The SFI program does not have separate accreditation processes for forest management and supply chain verification.

B. Process and Qualifications

How are firms and individuals accredited? What are the required capabilities and qualifications of the firms and the individuals within those firms that desire to become accredited to perform certifications?

Individual auditor accreditation

- As noted above, SFI lead verifiers are required to be certified by RAB at one of four possible levels to perform ISO 14001 EMS audits. The common prerequisite for RAB certification for all of the four possible levels, or what RAB refers to as “grades,” is a 36-hour “lead auditor” training program, to which are added specified education and experience requirements. The four grades differ in the amount of actual auditing experience required of the individual auditor. Two of these grades -- Environmental Auditor: Provisional (E-PA) and Environmental Auditor (EA) – apply more narrowly to environmental regulatory compliance audits. The two grades that are most relevant to the SFI program are Environmental Management Systems Auditor (EMS-A) and Environmental Management Systems Lead Auditor (EMS-LA). In addition to these RAB requirements, the SFI lead verifier must meet additional qualifications that are unique to the SFI program. These additional requirements are set forth in SFI 2002 (Qualifications of Lead Verifiers).
- The FSC does not require the accreditation of individual auditors employed by accredited certification bodies.

Certifying body accreditation

- Both programs require an application, desk audit, and field audit to be conducted for firms that seek to be accredited, and as noted above, accreditation of certifying bodies is mandatory in the FSC program, whereas accreditation of a firm as an ISO EMS auditor is optional in the SFI program where the focus is on the RAB certification of the individual auditors.
- Both programs require that firms seeking accreditation be financially sound, have management systems in place, and have conflict of interest avoidance policies. Under the SFI program, this requirement is only relevant to firms that choose to seek to be accredited by ANSI-RAB/NAP.
- The SFI requires that a professional forester serve on each certification team. The FSC requires that members of the interdisciplinary certification team have forestry knowledge, but

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does not require a professionally credentialed forester, unless required by state law, such as in California.

C. Oversight Mechanisms

Is an annual review required, and, if so, what are the components of an annual review?

- The FSC requires an annual review of the accreditation of the certification body that includes a desk/paper audit, on-site audit, and field audit. There are no annual review requirements for auditors under the FSC because lead auditors are not required to be accredited.
- Under the SFI program, an annual review is required for certifying bodies that choose to be ANSI-RAB accredited. This review includes a desk/paper audit, on-site audit, and a “witness” audit. Individual auditors are required to be audited annually by RAB, and this is limited to a desk/paper audit. There are no provisions in the SFI program for annual audits of the requirements for SFI lead verifiers that go beyond mandatory RAB certification or optional ANSI-RAB/NAP accreditation of certification firms.

Are there unannounced audits?

- For the FSC program, unannounced audits of certifying bodies are conducted as needed. Unannounced audits of individual auditors are not conducted under the FSC because FSC accredits firms, not individuals.
- For the SFI program, where accreditation of certification firms is optional, ANSI-RAB/NAP reserves the right to conduct unscheduled office audits, and RAB does the same for individuals certified as one of the four possible grades of EMS auditors. There are no provisions in the SFI program for unannounced audits of the requirements for SFI lead verifiers that go beyond mandatory RAB certification or optional ANSI-RAB/NAP accreditation of certification firms.

Is there a mechanism to correct inappropriate actions of the individual auditors or certification bodies?

For individual auditors:

- Under the SFI program, there is a corrective action mechanism for RAB certified auditors. Administration of this mechanism is the responsibility of RAB, not the SFI program.
- Such a mechanism is not applicable to FSC because lead auditors are not required to be accredited. However, malfeasance of an individual auditor can be addressed through a grievance lodged against the certification body that employs or has otherwise retained that auditor.

For certifying bodies:

- Both programs include a mechanism to correct problems that are brought to light regarding the activities of the accredited certifying bodies.
- For the SFI program, there is a corrective action mechanism for firms that choose to be ANSI-RAB/NAP accredited. Administration of this mechanism is the responsibility of ANSI-RAB/NAP, not the SFI program.

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D. Funding

How is the oversight process funded?

- For both programs, the certifying bodies themselves pay the cost associated with obtaining accreditation.
- Under the SFI program, individuals who seek RAB certification or their employer (i.e., the certifying firm) pay the cost of obtaining RAB certification. This cost is not applicable to the FSC because lead auditors are not required to be accredited.

E. Dispute Resolution

Is there a mechanism to address accreditation disputes against the accreditation body that are filed by the individual or firm that is seeking to be accredited?

Individual auditors

- Under the SFI program, individual auditors would seek to resolve disputes over RAB certification with RAB, not the SFI.
- As FSC auditors are not individually accredited, the FSC does not have any provisions for individual auditors to address grievances they might have with the accreditation body, but the FSC does require certification bodies to establish internal dispute resolution procedures to address grievances individual auditors may have with the certification body.

Certification bodies

- In the case of accreditation disputes between the certification body and the accreditation body, both programs have a dispute resolution mechanism, but under the SFI program, such disputes are filed and resolved within ANSI-RAB/NAP, not the SFI.

Is there a mechanism to address grievances or challenges regarding the decision to accredit certifying bodies or individual auditors that can be brought by other parties?

- In the FSC program, there is an explicit mechanism for addressing grievances against FSC-accredited certification bodies that can be filed by parties other than the firm seeking certification services. As individual auditors are not accredited under the FSC program, filing such grievances with the accreditation body (i.e., the FSC itself) is not applicable; however, as noted above, malfeasance of an individual auditor can be addressed through a grievance lodged against the certification body that employs or has otherwise retained that auditor.
- In the SFI program, grievances over the decision by RAB to award certification of an individual to one of the four categories discussed previously can be submitted to RAB for consideration. In the case of the accreditation of certification firms such grievances are filed with ANSI-RAB/NAP. The SFI does not have an internal dispute resolution mechanism process regarding certification of SFI lead verifiers or the accreditation of certification firms to serve as SFI lead verifiers.

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F. Conflicts of Interest

How are conflicts of interest between the accrediting body and the certifying body addressed?

- Both programs require that individual auditors be free of conflicts with the entity being certified.
- The SFI program relies upon the conflict of interest requirements that RAB and ANSI-RAB/NAP have in place as they relate to underlying mandatory requirements for RAB certification of individual auditors and optional ANSI-RAB/NAP accreditation of certification firms. Specifically, members of accredited certifying bodies that sit on the ANSI-RAB Board must file “statements of conflict of interest” and must agree to remove themselves from Board decisions for which a conflict of interest exists. There are no explicit requirements to address any conflicts of interests related to the requirements for SFI lead verifiers that go beyond mandatory RAB certification or optional ANSI-RAB/NAP accreditation of certification firms.
- In the FSC, a certifying body can be a member of FSC, but individuals affiliated with such an entity cannot serve on the FSC Board or Conflict Resolution Committee. However, representatives of accredited certifiers can be and are *ex officio* members of the FSC-US Board of Directors.

G. Public Notice/Disclosure

Does the program publicly disclose the mechanism(s) by which disputes over accreditation matters can be filed and resolved?

- In the FSC, public disclosure is accomplished through publicly accessible FSC documents (e.g., the FSC Accreditation Manual) and through the FSC website.
- For the SFI program, information on the availability of the mechanism by which such disputes can be filed and resolved are publicly assessable through ANSI-RAB documents rather than SFI documents.

Does the accrediting body publicly report a positive outcome of an accreditation decision?
Individual auditors

- In the SFI program, RAB maintains a publicly accessible list of all certified environmental auditors on the RAB website unless the individual auditor requests RAB not to. The SFI program maintains a publicly accessible list of the lead contacts of those firms that have been awarded SFI certification contracts. Upon request, the lead contacts of these firms can provide a list of the individuals who have served as SFI lead verifiers.
- Public announcement of a positive accreditation decision for individual auditors is not applicable to the FSC because individual auditors are not required to be accredited.

Certification bodies

- The accrediting body for both programs publicly announces positive outcomes of accreditation decisions for certification firms.
- As noted above, in the SFI program this is only relevant to those certification bodies that have optionally elected to obtain ANSI-RAB/NAP accreditation. A list of the lead contacts of

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those firms that have been awarded SFI certification contracts is available from the SFI program.

Does the program require that a summary of a positive accreditation decision be made publicly available?

- The SFI program does not require a summary of positive accreditation decisions be made publicly available. This is done by ANSI-RAB/NAP only when required by law or by the certifying body at its discretion.
- The FSC requires a summary of positive accreditation decisions be made publicly available and includes specific provisions concerning the type of information that must be included in the summary.

Does the program require information to be publicly available that characterizes the approach accredited certification bodies take to the certification process?

- FSC-accredited certification bodies must make publicly available the standards employed in the field, as well as an overview of the protocols for applying the standards and rendering a certification decision.
- The SFI program RAB and ANSI-RAB/NAP do not have such a requirement. Such information may be available directly from individual auditors and certification firms who are seeking to provide certification services.

H. Status

How many accredited certifiers are there under the program? What are the names of the accredited certifiers?

- For the FSC, see Section 3.H in Volume II.
- For the SFI program, see Section 3.H in Volume III.

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SECTION 4. MECHANICS OF THE CERTIFICATION PROCESS

DEFINITION: The process that determines whether an entity or operation merits certification.

A. Basic Information

What is the basic approach used to conduct certifications?

FSC	SFI
<ul style="list-style-type: none"> ▪ Third-party certification is the only option under the FSC. ▪ The FSC is an international certification program that is modeled after ISO, but it is separate and distinct from ISO. ▪ The FSC allows entities to obtain separate certifications for their forest management operations and the handling of wood products coming from certified forests (i.e., “chain-of-custody”). <i>(This section addresses forest management certifications; chain-of-custody certifications are addressed in Section 5.)</i> 	<ul style="list-style-type: none"> ▪ Under the SFI program, while AF&PA member companies are required to annually report to AF&PA the results of a first-party verification (self-verifications) against the SFI standard as a condition of membership in the AF&PA, third-party verification/certification is optional.⁹ ▪ The third-party certification component of the SFI program is linked with the ISO system in the sense that ANSI-RAB serves as the accrediting body. and the SFI standard is considered an “industry standard” within the ANSI definition. ▪ SFI program does not have a separate certification process for “chain-of-custody.” <i>(The mechanisms by which the SFI program addresses management control of its program logo and product label are addressed in Section 5.)</i>

B. Process and Protocols

1. *What are the decision-making rules and protocols that determine whether to certify?*

- For both programs, the certifying body must determine that the forest management operation has substantially complied with all relevant Principles in the case of the FSC, and all relevant Objectives in the case of the SFI standard, in order for a certificate to be issued. Both programs ultimately rely upon the professional judgment of the accredited, independent, third-party auditor.
- FSC requires that each accredited certification body have express written decision-making rules and protocols that are explicitly assessed by the FSC accreditation staff. In the case of Scientific Certification Systems, for example, these include a written decision-making protocol that employs decision science methodologies to generate weights of relative importance, assignment of numerical scores, and comparison of those scores against express thresholds of certifiable performance.

⁹ The SFI program documents use the terms “third-party certification” and “third-party verification” interchangeably. For a definition of the terms first-party verification, second-party verification, and third-party verification/certification, see footnote 1.

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2. *Is the process confidential with respect to proprietary business information, and, if so, to what extent?*
 - Both processes recognize and have similar procedures in place to protect the confidentiality of proprietary business information.
3. *How long does the process take to determine whether or not to certify? Is there a specified timeline?*
 - Neither program has a specified time frame for completing the certification process, nor are there any inherent features of the certification processes for either program that can result in an outcome being achieved in a specified period of time.
 - For both programs, the certification timeline varies based on the size and complexity of the operation being certified.
4. *Is there a preliminary evaluation? What information is typically included in the preliminary evaluation?*
 - The SFI does not reference preliminary evaluations and leaves this to the client and certification firm to decide.
 - The FSC explicitly discusses preliminary evaluations as an optional first step in a certification process.
5. *Can conditions be placed on a certificate, and, if so, how does this work?*
 - The programs are similar in that there are three possible outcomes of a certification application (although the programs use different terminology to describe this):
 - a. All requirements are met, and the certificate is issued;
 - b. Minor non-conformance to the standard is found, and the applicant is certified with “conditions” that must be met within an agreed-upon period of time; or
 - c. Major non-conformance to the standard is found and must be resolved before a certificate can be issued.
6. *Is there an internal review (between the auditor and entity being certified) after the initial findings and before the final decision?*
 - Both programs require an internal review after the initial findings and before the final decision.
7. *Is there a peer review? Is this a part of the preliminary evaluation or the final certification?*
 - The FSC requires a peer review of the assessment report to be conducted by at least two disinterested and credible reviewers with the technical capacity to assess the analytical quality of the report before final certification decisions are made. In addition, the

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certifying body must consider and document the actions taken in response to comments from the peer reviewers.

- The SFI program and its accrediting body, ANSI-RAB, do not have any requirements for peer review for certification decisions.

8. *Is there a public disclosure requirement that a certification process is to take place, and, if so, what is the nature of that public disclosure? Is there stakeholder consultation? Does the auditor talk to external parties, and, if so, to whom and to learn about what?*

- The FSC has a mandatory public disclosure requirement; the SFI does not. While both programs have stakeholder consultation requirements, the FSC requirements are more extensive and detailed in comparison to the SFI program.
- Under the FSC, there is a specified timeline for identifying and contacting stakeholders. For example, the FSC requires stakeholders to be identified and informed that a certification process is taking place at least one month prior to the initiation of the field evaluation. In addition, the certifier must have procedures for soliciting and responding to all stakeholder questions and comments.
- The SFI program has no provision for public disclosure of a company's intent to undergo a certification process. (Some companies use third-party certification as a confidential means of management control without making public claims.) While the audit/verification team conducting SFI program audits is encouraged to interview knowledgeable persons to verify compliance with the SFI standard, such interviews are not required.

9. *What, if any, public reporting of results is required? How accessible are the public reports? Who prepares the public reports?*

- Neither program requires public reporting if a certificate is not issued.
- When a certificate is issued, the programs differ with regard to the extent of and conditions under which information is made publicly available, and they also differ with regard to who is responsible for such a report.
- For the SFI program, a summary of a positive certification decision is required to be made public only if the company decides to publicly proclaim the result of the certification. At a minimum, the summary must include the "general results of conformance to the SFI standard." This summary is the property of the certificate holder and is not available from the certifying body. As a result of changes to the SFI program made on November 13, 1999, this summary is available upon request from the certified company.
- With the FSC, positive results of a certification decision are required to be summarized by the certifying body, and the summary must be made available to the public. Among other prescribed information items, the summary must include a list of any "conditions" under which the certificate has been granted. The summary must be posted on the certifier's website, and the summary and the entire assessment report are also on file at the FSC - International.
- Comprehensive public summaries of certification reports are therefore generally more readily accessible under the FSC.

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10. *Are follow-up audits conducted after an entity has been certified, and, if so, how often? Can the certifier conduct unscheduled audits? Once certified, is the certificate for a defined term, and, if so, how long?*

- The programs are different in that the FSC mandates annual follow-up audits and the SFI does not.
- The FSC requires certification bodies to contractually reserve the right to conduct unscheduled audits.
- While SFI program verifiers do not conduct random audits, the SFI External Review Panel operates a Forest Monitoring Project (FMP) that conducts field visits to randomly selected SFI program participants reviewing specific management units and sampling field performance relative to the SFI program objectives and performance measures.
- SFI program participants must be recertified within three years of their first certification and every five years thereafter.
- FSC certificates are valid for certifier-specified time periods not to exceed five years, subject to annual audits. At the expiration of the specified life of the certificate, the forest operation must be reevaluated under full evaluation protocols for potential recertification.

C. Use of Teams

Are teams utilized to conduct an audit/assessment, and, if so, who makes up or participates in audit/assessment teams? How are they selected (specifically, what is the role of the entity that is being certified in selecting the assessment team)? What are the roles and responsibilities of the members of the audit/assessment team?

- Both programs utilize teams that are formed by the certification bodies, which is the entity that has the final word on team composition for both programs. In both programs, team size varies with the size and complexity of the entity being evaluated.
- The SFI standard requires that a professional forester serve on each team. The FSC requires that one or more team members have forestry knowledge, but does not require a professionally credentialed forester, unless so required by state or federal law. In addition, given the more extensive focus on social issues in the FSC standard, the FSC requires that a social science perspective be represented on each team or that social issues be addressed in the makeup of small teams.
- FSC audit teams make a recommendation regarding certification supported by audit findings. The final determination is made by the accredited certification body, which uses a committee of non-team members to make the final decision. In the SFI program, each certification body has its own methodology for arriving at a recommendation, but it is the lead verifier who makes the final decision.

D. Degree of Customization for Different-Sized Landowners

Does the certification process differ for different-sized landholdings, and if so, how?

- Both programs allow for the customization of an audit to deal with different sizes and complexity of forest management operations.

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- In the United States, FSC certifiers employ a specialized approach to group certification, referred to as “resource manager certification,” which is intended to provide a mechanism for certifying small landholdings. Under this approach to certification, the Resource Manager has no legal right (title, concession, etc.) to the forest resource they manage, but rather they serve as the expert who is contracted by a group of landowners to manage their forests. FSC-accredited certification bodies certify a Resource Manager’s approach to forest management as it is implemented on enrolled client landholdings. The Resource Manager must meet all of the technical and procedural requirements for “single forest management unit” certifications (e.g., annual audits). In addition, there are specific criteria regarding administration of a group scheme that must be met by the Resource Manager.
- Under the SFI program, a program participant’s wood procurement system is required to include a any existing “landowner assistance program.” More than 15,000 non-industrial private forest landowners throughout the United States are participating in these programs. The SFI program has consulting forestry firms that are AF&PA members or SFI program licensees. The SFI program has enrolled a landowner cooperative representing over 800 non-industrial, private forest landowners in the SFI licensing program, opening up another avenue for certification of smaller ownerships. Finally, the SFI program has a mutual recognition agreement with the American Forest Foundation’s American Tree Farm certification system, which recently revised its standards for small, non-industrial private forest landowners to be consistent with the SFI standard and is currently in the process of conducting an independent audit to assess general compliance with the SFI standard. With the American Tree Farm program, the certificate is held by the individual landowner.

E. Application of the Standards to Partial Estate Certification

Can the standards be applied to a portion of the forest estate of the entity being certified? How are partial estate certifications handled?

- In the FSC, forest landowners that seek FSC certification who are not FSC members may obtain partial estate certification. Forest landowners that are FSC members must commit to have their entire landholding evaluated over a reasonable time frame.
- Partial estate certification is permitted under the SFI program. An organization may choose to verify the conformance of discreet operating units. These organizations may be geographically distinct and/or separate management units with different species, product lines, and/or customers. The location and activities of a forestry organization frame the physical scope of the verification. Any deviation from this direction must be agreed to in writing by the Program Participant and the lead verifier. In addition, for an AF&PA member company or SFI program Licensee, all of its forestry operations nationwide must conform to the SFI standard, whether or not they are independently third-party certified.

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F. Conflicts of Interest

Does the system address any perceived conflicts of interest (e.g., business or financial relationships) between the certifiers and the entities being certified during the pre- and post certification periods, and, if so, how?

- Both programs have similar rules that address conflicts of interest between certifying bodies and those entities seeking to be certified during both the pre- and post-certification periods.

Is the certifier and/or the entity being certified allowed to interpret or choose which aspects of the standard are applied, and, if so, how and to what extent? What role does the forest owner/manager have in determining which standards are applied, both in general as well as in relation to any optional standards?

- Under the SFI program, while adherence to the SFI Objectives, Performance Measures, and Core Indicators is mandatory, an optional set of “Other Verification Indicators” exists and the certifying body and entity being certified can use them to customize and tailor the certification process to local conditions. In addition, the SFI program participant and the certifying body may craft additional indicators, beyond and in addition to the Core Indicators, to better reflect local circumstances or conditions.
- Under the FSC program, the entity being certified has no role in interpreting the FSC standard as it is applied to the particular certification process they are engaged in. Thus, the FSC Principles and Criteria and the Interim Standards of the certifying body are mandatory. However, each FSC-accredited certifying body has developed its own set of interim standards, and its own unique auditing process and system for scoring and weighting to apply the FSC standard; however, these protocols must comply with international norms set forth in the FSC Accreditation Manual. In addition, each entity seeking to be certified can select the accredited certifying body of its choice based on the certifying body’s approach to certification. Finally, the FSC’s National Indicators are currently being used as the basis for developing Regional Standards. While forest landowners can participate in this process of developing the FSC Regional Standards, they are but one of several stakeholder groups engaged in this process. Once finalized, the FSC Regional Standards will replace both the National Indicators and the Interim Standards of the accredited certification bodies.

G. Non-compliance by Certificate Holders

Are there mechanisms in place to respond to non-compliance and/or public complaints about non-compliance after certification and, if so, what are they?

- Both programs have response mechanisms to address non-compliance after a certificate has been issued, but they deal with it in different ways.

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- The FSC has more elaborate procedures for responding to non-compliance. The FSC's mandatory annual audits can find evidence of non-compliance that will trigger a Corrective Action Request. Other parties can also register a complaint with the FSC Secretariat or the certifying body. The FSC makes a distinction between minor and major corrective action requests. With a minor case of non-compliance, the certificate is still valid. There is no precise equivalent under the SFI.
- The SFI program addresses non-compliance after a certificate has been issued through the Inconsistent Practices Protocol. This protocol includes three possible mechanisms. The primary mechanism to address non-compliance is through the SIC that receive and investigate complaints. The second mechanism is via the annual reports that AF&PA member companies must submit to AF&PA. AF&PA staff review these reports and may raise questions if there appear to be any instances of potential non-compliance with the SFI standard. If there is a problem, the director of the SFI program makes a request to the company for more information. If the problems are not resolved, the AF&PA Board of Directors could potentially revoke membership in AF&PA or cancel an SFI licensee agreement for cause. Third, a party can lodge a complaint with the ERP or the SSFB. The ERP usually sends the complaint back to the SIC if it has not first gone through this channel.
- A salient difference is that in the SFI program, the certifying body may be brought in to investigate, but more routinely the process is handled via the Inconsistent Practices Protocol.
- With the FSC, the certifying body is involved from the outset by either discovering the non-compliance to begin with (which usually occurs during an annual audit), by receiving information/allegations from an outside party, or by being called in by the FSC to investigate an allegation of non-compliance lodged with the FSC. If not adequately resolved by the certifier, the FSC itself conducts an investigation.

Can a certificate be recalled and, if so, on what grounds?

- Once issued, the certifying body is the only body that can revoke a certificate under both programs. However, FSC-accredited certification bodies can be mandated by the FSC to revoke a certificate under threat of loss of accredited status. Specifically, program staff cannot revoke a certificate, but they can put pressure on the certifying body by threatening to rescind the certifying body's accreditation. As noted above, the AF&PA Board can pull a membership or license for cause.
- For both programs, a significant non-conformity is grounds for seeking to have a certificate revoked.

H. Compliance with Changes to the Standard

Are certificate holders required to come into compliance with changes that are made to the standards after certification has been completed? How does this work?

- The programs are similar in that they both require certificate holders to comply with changes in the standard within one year of the change. However, there is a salient difference in the

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- timing of the verification of this compliance.
- Beyond the CEO's annual letter attesting conformance and submission of an annual report to the AF&PA, third-party verification that a certificate holder has complied with changes to the SFI standard will occur three years after the initial certification and every five years thereafter.
 - For the FSC, verification of compliance with changes to the FSC standard will occur within one year as part of the mandatory annual audits.

I. Dispute Resolution

What is the process for dispute resolution and appeals between the certifier and the entity being certified and/or any other parties/stakeholders?

- Both programs have a process for resolving disputes between the certifier and the entity being certified and/or any other parties/stakeholders; however, they differ in the prescriptiveness of the process.
- With the SFI program, disputes between the certifier and the entity being certified are handled by RAB, ANSI-RAB/NAP, or through whatever dispute resolution provisions exist in the contract between the certifier and the entity being certified. Disputes involving other stakeholders are directed in accordance with the SFI Inconsistent Practices Protocol to the proper SIC or the SFI's External Review Panel.
- With the FSC, disputes between the certifying body and the entity being certified, as well as those involving outside parties, are handled first by the certification body, next by FSC International, and ultimately (if satisfactory resolution is not achieved) by the Conflict Resolution Committee and FSC International Board of Directors in accordance with a detailed set of procedures.

What role does the general public or other stakeholders play in the dispute resolution process?

- For FSC, solicitation of stakeholder input is a mandatory part of the investigation.
- Under the SFI program, stakeholder input is not a mandatory part of the investigation, but it is undertaken when the verifier deems it may provide useful information or perspective.

J. Costs

What are the types of costs, the range of costs and the cost factors that are determinative of the actual cost of completing the certification process?

- The programs do not set the cost of certification; the certifying bodies do.
- Costs are based on time and materials for professional services rendered; they are negotiated between the entity being certified and the certifying body and are paid directly to the certifying body. In general, the total cost is directly proportional to the size and complexity of the property being certified.

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SECTION 5. CONTROL OF PROGRAM LOGO AND/OR PRODUCT LABEL¹⁰ AND SUPPLY CHAIN VERIFICATION

DEFINITION: The approach used to maintain control over the use of a program's logo and/or product label and the approach to tracking raw materials from the forest to the final point of sale (from "stump to store").

A. Basic Approach

Does the program use a program logo and/or a product label and, if so, how? Specifically, under what circumstances or rules may the program logo and/or product label be used?

- Both programs use a graphic symbol in combination with initials and/or words for the purpose of a program logo and a product label (as those terms have been defined for the purpose of this report); however, they differ in their approach.
- The FSC uses the same "checkmark and tree" symbol and the FSC initials for its program logo and product label, which it has registered as a trademark and is referred to as the "FSC logo." This logo has been an integral part of the FSC program, and it has not changed from the inception of the FSC. The use of the FSC logo is directly related to the underlying philosophy of the program to provide market rewards through the labeling of forest products with a distinct logo derived from lands recognized for "exemplary" forest management.
- As of the cutoff date for including programmatic features in this report, the SFI program has two different versions of a program logo available for use by program participants, as well as an on-product label for which it has established rules for its use, but has not yet permitted its use.
- The SFI program logo, which is registered with the U.S. Patent and Trademark Office, U.S. Department of Commerce, as both a "collective" mark and a "service" mark, has undergone three stages of evolution. The first stage, which began in 1997, used a symbol similar to the AF&PA logo. In 1999, the SFI program logo was changed to a "bear, fish, and tree" symbol, and use of the original SFI program logo was no longer permitted. In March 2001, a new "tree and shield" symbol was introduced. This symbol must be accompanied by the words "Sustainable Forestry Initiative" and is permitted for use only by those SFI program participants that have completed a third-party certification. The second version of the program logo (i.e., the one that uses the "bear, fish, and tree" symbol) continues to be permitted for use by SFI program participants that have not completed a third-party certification.
- In January 2001, the AF&PA Board approved rules for an on-product label, which the SFI program documents refer to as a "certification" mark, and began receiving applications for its use in May 2001. The on-product label uses the same "tree and shield" symbol as the most recent version of the SFI program logo, but it is accompanied by a different set of words and initials as follows: "SFI Certified Participant," or as appropriate "SFI Participating

¹⁰ For purposes of this report, the term "program logo" refers to the symbol, words, and/or initials used for generic communication purposes for any aspect of the program other than the combination of symbol, words, and/or initials that are used as a product label. The term "product label" is used to refer to the symbol, words, and/or initials that are used on or near products for the specific purpose of communicating that the product has been certified under the FSC or SFI program.

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Manufacturer,” “SFI Participating Retailer,” “SFI Participating Publisher.” Whenever this on-product label is permitted for use, it too will only be available for use on products derived from forest management operations that have been third-party certified under the SFI program or other recognized third-party forest management certification programs. However, as of the cutoff date for this report, the SFI program does not permit the use of its on-product label.

Program Logo

- Both programs have similar restrictions on the use of a unique combination of symbol and initials/words as a “program logo” that are aimed at allowing it to be used for non-product labeling promotional purposes by program members, participants, and supporters, as well as by the program itself, for such things as brochures, leaflets, letterheads, business cards, advertising, company prospectuses, and reports.

Product Label

- Both programs have established rules that only allow their unique combination of symbol and initials/words to be used as a “product label” on material that has been third-party certified, and they have detailed restrictions on the use of their “product labels”; however, as described below in Sections 5.B and 5.C, they differ in their approach. In addition, as of the cutoff date for considering programmatic material for inclusion in this report, the SFI program does not permit the use of an on-product label.

B. Composition Requirements

What are the composition requirements (percentage-based claims) that are permissible for use of the product label? Do they differ depending on the nature of the product (e.g., wood vs. paper)?

SFI ¹¹	FSC
<ul style="list-style-type: none"> ▪ The SFI makes a distinction between “primary producers” and “secondary producers,” both of which must apply to the AF&PA/SFI Office of Label Use before using the SFI product label (certification mark). 	<p>The FSC only permits the FSC logo to be used as a product label on products that contain raw materials that are generated from an FSC-certified forest operation. The FSC does not recognize or allow material that has been certified by another standard to utilize the FSC logo.</p>

¹¹ As of the cutoff date for this report, the SFI program has established rules for the use of an on-product label and has initiated a process for receiving applications for its use by SFI program participants, but has not yet decided to permit its use.

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(Composition Requirements continued)

SFI ¹²	FSC
<ul style="list-style-type: none"> ▪ For a primary producer to use the SFI product label (certification mark), the wood or wood fiber in the product must be sourced completely (100%) from forestlands certified under the SFI standard OR other acceptable standards, and/or the product must be comprised of wood, wood fiber, semi-finished wood, paper, market pulp, or composite wood fiber procured in compliance with the SFI standard OR other acceptable standards. ▪ Acceptable standards recognized by the SFI program include: <ul style="list-style-type: none"> ▪ The American Tree Farm System (ATFS); ▪ Canadian Standards Association's (CSA) Sustainable Forest Management System Standard; ▪ Finnish Standard; ▪ Forest Stewardship Council; ▪ Pan-European Forest Certification; ▪ Swedish Standard; and ▪ United Kingdom Woodland Assurance Scheme. ▪ In addition, for primary producers, at least one-third (by weight) of the total wood fiber content must come from sources certified to be in compliance with the SFI standard, and/or with the approval of SFI program, the ATFS, or CSA. ▪ For secondary producers, at least two-thirds (by volume) of the wood or fiber in the product must come from sources that have been certified to be in compliance with the SFI standard OR other acceptable standards (same list as above), AND at least one-third (by volume) of the total wood fiber content must come from sources certified to be in compliance with the SFI standard, ATFS, or CSA. 	<ul style="list-style-type: none"> ▪ FSC-accredited certification bodies administer the use of the FSC logo for entities they have certified. Oversight of the administration of the FSC logo as product label by certificate holders is accomplished by the FSC through the annual monitoring of certification bodies. As well, the FSC has designated "nominated agents" around the world that provide oversight/control of the logo use. ▪ In administering the FSC logo as a product label, the FSC distinguishes between five different types of products, each of which has unique minimum percentage composition requirements: <ul style="list-style-type: none"> ▪ (Singly labeled) Solid wood products (100% by volume); ▪ Collections of solid wood products (70% by volume); ▪ Non-timber wood products; ▪ Assembled wood products (70% by volume); and ▪ Chip and fiber products (17.5% by weight of total and 30% by weight of virgin wood chip or fiber, provided that neutral fibers are also part of the fiber mix). ▪ The FSC requires that the precise percentage-based claim be included alongside the FSC logo when it is being used as a product label for assembled and chip and fiber products. ▪ Retailers, wholesalers, and other organizations may use the FSC logo to promote the sale of products that have already been labeled with the FSC logo. Permission for such uses is granted by "nominated agents" from the National Initiative in which that organization is located and/or an FSC-accredited certification body.

¹² Ibid footnote 1.

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C. Supply Chain Verification

Does the program have a process for verifying the supply chain, and, if so, what are the standards and process?

- The FSC requires a “chain-of-custody” certification to be completed, separate and distinct from certification of forest management operations, to use the FSC logo on a product at any stage of the “value chain” beginning from the point of harvest to the point of final sale. This chain-of-custody certification process is based upon a standard, which, like the FSC standard for forest management certifications, is set forth as P&C. They include a total of six principles and 25 criteria embedded within these principles that address:
 1. Documented control system
 2. Confirmation of inputs
 3. Separation and/or demarcation of certified and non-certified inputs
 4. Secure product labeling
 5. Identification of certified outputs
 6. Record keeping
- The SFI program uses a two-pronged approach to supply chain verification – direct certification of the lands owned and/or directly controlled by SFI program participants and a procurement systems approach to address approximately 70% of the wood supply for SFI program participants that originates from non-industrial forest landowners or other uncontrolled sources. The procurement systems approach is not based on physical verification of the origin of each load of logs produced or delivered, but rather on a variety of approaches including random sample field checks or other means of verification that the forest owner, contractor, or wood supplier utilize in compliance with the intent of SFI Objective 8. In contrast to the prescriptive nature of the FSC procedures, the SFI relies on the accredited lead verifier to determine the most effective approach and is therefore not explicit in any prescribed methodology. In addition, the SFI program rules for use of the on-product label, when they are fully implemented, will require companies using the SFI program label to use wood fiber from the certified sources listed above. Thus, the SFI program approach to supply chain verification is incorporated into the SFI program procurement system standard and its approach to the on-product label rather than requiring a separate and distinct certification.

Are raw materials tracked through the entire process (from stump to store — from the forest to the final point of sale)? If so, how?

- The FSC chain-of-custody certification process is based upon physical verification of all inputs and outputs.
- The SFI program approach to supply chain verification is not based on physical verification of each distinct piece or batch but rather a “mass balance” or “systems approach” to total inputs and outputs. Thus, whatever percentage of certified raw material can be claimed as an input determines the percentage that can be labeled as SFI-certified output, without regard to whether each distinct item has been labeled as such.

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Does the supply chain verification process differ when the raw material is taken from the producers' own forestland versus forestland owned by another entity? If so, how?

- The SFI program relies upon direct certification of lands controlled by the SFI program Participant and a procurement systems approach to address the wood supply that originates from non-industrial forest landowners or other sources that are not controlled by the SFI program Participant.
- The FSC relies upon the same forest management and chain-of-custody certification processes regardless of who is the original landowner.

D. Costs

What are the types of costs, the range of costs, and the cost factors that are determinative of actual cost of completing a chain-of-custody audit?

- The cost for supply chain verification for both programs is based on time and material depending upon the size and complexity of the operation.
- The FSC has certain cost factors associated with on-site inspections and physical verification of inputs and outputs for its chain-of-custody procedures that are different from the SFI program's wood procurement system audits. Neither program's verification can be accomplished with a paper audit alone.

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SECTION 6. STATUS OF PROGRAM IMPLEMENTATION AND PARTICIPATION

Please see Section 6 of Volumes II and III for the FSC and SFI, respectively, to learn:

- *How many companies/landowners have been certified/verified?*
- *How many certificates have been issued/verification reports received?*
- *What are the total number of acres certified/verified under each program?*

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APPENDIX A. PANELIST BIOGRAPHICAL INFORMATION

Jane Difley is President/Forester of the Society for the Protection of New Hampshire Forests, a statewide conservation organization and land trust founded in 1901. SPNHF owns 33,000 acres in 123 reservations across the state and was the first landowner in New Hampshire to be FSC certified (via Smartwood). SPNHF is also a licensee of the Sustainable Forestry Initiative and its lands are Tree Farm certified. Difley serves on the SFI External Review Panel and on the FSC Northeast Standards Working Group. She is the former national director of the American Tree Farm System, and a Past President of the Society of American Foresters. She holds an undergraduate degree in English from Connecticut College and a Masters Degree in Forestry from the University of Massachusetts.

James Grace is the State Forester and Director of the Pennsylvania Department of Conservation and Natural Resources Bureau of Forestry. The 2.1-million-acre Pennsylvania State Forest is the largest FSC-certified forest in North America. It is also a licensee in the SFI program. Grace serves on the SFI External Review Panel, and is a member of the Pennsylvania SFI State Implementation Committee. He served on the Society of American Foresters Forest Certification Task Force, and he is a member the National Association of State Foresters Resource Management Committee. He has given numerous presentations and seminars throughout the country on matters relating to forest certification and sustainable forestry. Grace holds degrees in forestry from the University of Vermont (BS), the Yale School of Forestry and Environmental Studies (MFS), and the Pennsylvania State University (PhD).

Robert Hrubes is Senior Vice President of Scientific Certification Systems, a California-based company offering a range of environmental certification services. He has been actively engaged in third-party forest certification work for the past 10 years. Hrubes has been instrumental in developing certification evaluation protocols, in establishing international policies and procedures governing certification activities, and in conducting certification evaluations throughout the United States as well as Canada, Brazil, Argentina, Chile, Sweden, Japan, Malaysia, and New Zealand. Hrubes served for 4 years on the founding Board of Directors of the Forest Stewardship Council and was founding Chair of the Board of Directors of the Forest Stewards Guild, a U.S.-based professional forestry society. Hrubes has been a professional forester for 28 years, having spent the first 14 years of his career with the USDA Forest Service and the following 14 years as a private consultant. Hrubes holds a BS in Forest Management from Iowa State University, an MS in Resource Systems Management from the University of Michigan, and an MA in Economics and a PhD. in Wildland Resource Science from the University of California-Berkeley.

Michael Jani is Chief Forester and Vice President of the Mendocino Redwood Company, a privately owned, 232,000-acre FSC certified forest on the North Coast of California. Prior to his tenure with Mendocino, Jani worked as a forester and then served as Chief Forester for Big Creek Lumber Company, a privately held FSC-certified forest in the Santa Cruz Mountains of California, from 1974 to 1999. He is a Registered Professional Forester with the state of California and a Certified Resource Manager with the Forest Stewardship Council. He is the current Chairman of the California Farm Bureau Forest Advisory Committee, a member of the

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economic chamber of the Forest Stewardship Council, and a charter member of the Forest Steward's Guild. Jani holds a BS in Forestry from the University of California-Berkeley.

Lynn Jungwirth is the Executive Director of the Watershed Research and Training Center, a community-based non-profit in the forest town of Hayfork, California, deep in the heart of the Shasta-Trinity National Forest. She was born and raised in milling and logging families in Oregon and has worked as a clerk in a sawmill, part of a falling team, and as co-owner of a small sawmill. She has served as Executive Director since the Watershed Center was established in 1993. The Watershed Center has been a member of the FSC-US Social Chamber since 1996, and Jungwirth serves on the Federal Lands Committee of the FSC-US. She holds a BA from the University of Oregon. Two of Jungwirth's colleagues have also been deeply involved with the functioning of the FSC-US through membership activities and have served or are presently serving on the FSC-US Board (current Chair), the Social Subcommittee of the National Standards Committee, the National Standards Drafting Committee, and the Pacific Coast Working Group to develop regional standards. This team approach has allowed the Watershed Center to participate in many FSC-US activities and bring the perspective of forest communities to the table.

John McMahon recently retired from Weyerhaeuser Company where he was Vice President, Timberlands External & Regulatory Affairs. Since joining Weyerhaeuser in 1964, he held several positions in the company's Timberlands operations, including technical forester at Longview, WA, forest engineer at Cascade, woods manager at Chehalis, WA, Oklahoma-Arkansas, and Springfield, OR, and western woods and raw materials manager. Since 1981, he has served as Vice President in several corporate Timberlands assignments. He also served on the AF&PA's Forestry Executive Committee and is a member of the Society of American Foresters. McMahon holds both a BS and Master of Forestry degree from the University of Montana.

John McNulty is Vice President of Seven Islands Land Company, a 975,000-acre property of the Pingree family located in Maine. McNulty has spent the past 23 years working for Seven Islands Land Company where he is responsible for all aspects of forest management. McNulty has coordinated certification activities for the property since 1993 when the lands were first certified under the Forest Stewardship Council by Scientific Certification Systems. In 1999, the Pingree forest was certified under the SFI standards 1-9 and re-certified by the FSC, making it the first property in the world to hold concurrent FSC and SFI certifications. McNulty serves as the current co-chair of the FSC Northeast Standards Working Group and is a member of the AF&PA Sustainable Resource Committee. He holds a BS in Forest Management from the University of Maine.

Carlton Owen is a principal with The Environmental Edge, LLC, a consultancy he founded in 2001 to "bring business and the environment together." Owen has more than 25 years of professional experience in forestry. During his 11 years with Champion International Corporation as Vice President of Forest Policy, he represented his company among the creators of the Sustainable Forestry Initiative. Serving continuously on the program's Executive Committee from its inception, he also chaired the Verification Task Group that developed SFI's first-, second- and third-party verification programs. Owen had line responsibility for

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Champion's sustainable forestry programs including certification of the company's 5+ million acres of U.S. forests and leadership for the company's groundbreaking ecological assessment of 1 million acres of Brazilian rain forest/savanna habitats that resulted in two-thirds of the area being designated for conservation purposes. In February 2001, he began a part-time role as the Interim Executive Director of the Sustainable Forestry Board. Owen holds a BS in Forestry and an MS degree in Wildlife Ecology from Mississippi State University.

V. Alaric Sample is President of the Pinchot Institute for Conservation, a position he has held since 1995. He is a Fellow of the Society of American Foresters and a Research Affiliate at the Yale School of Forestry and Environmental Studies. Al has served in public, private, and non-profit organizations including the Conservation Foundation, the American Forestry Association, the U.S. Forest Service, Champion International, the Wilderness Society, and the Prince of Thurn und Taxis in Bavaria, Germany. Sample has served on numerous national task forces and commissions, including the President's Commission on Environmental Quality task force on biodiversity on private lands and as co-chair of the National Commission on the Science of Sustainable Forestry. Among his many publications, he is co-author of *Defining Sustainable Forestry* (1993). Sample holds a BS in Forest Resource Management from the University of Montana and an MBA, Master of Forestry, and PhD in Resource Policy and Economics from Yale University.

R. Scott Wallinger is a Senior Vice President of Westvaco Corporation and has been responsible for the company's forest resources since 1972. In 1994, he chaired the steering committee that created the AF&PA Sustainable Forestry InitiativeSM. He is a Fellow of the Society of American Foresters and served two terms on its governing Council. He is Westvaco's Liaison Delegate to the World Business Council for Sustainable Development where he focuses on sustainable forestry. He co-leads The Forests Dialogue, an international group for dialogue on global forest issues. He is Past President of the American Forestry Association and Past Chairman of the American Pulpwood Association. Wallinger has forestry degrees from North Carolina State and Yale Universities and completed the Advanced Management Program at Harvard Business School.

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APPENDIX B. DESCRIPTION OF THE PROCESS THE PANEL USED TO COMPARE THE FSC AND SFI PROGRAM STANDARDS

Identification of Issue Areas

In its examination of the FSC and SFI program standards, the Panel identified a total of 31 issue areas that it felt were the most important points of comparison. Program support staff then went about the task of identifying which standards for their program address each issue. Once this information was collected, a rating scheme was developed to highlight the salient similarities and differences between the standards of the two programs and to serve as a starting point for the Panel's deliberations.

Deliberation on Similarities and Differences

Each panelist was asked to a) independently rate whether the program standards address the issue explicitly, implicitly, or not at all; and b) using a 1-5 scale, assess the degree of similarity and/or difference regarding the manner in which each program addresses each issue. Specifically, are the two approaches

1. Fundamentally the same?
2. Similar?
3. Equally similar in some respects and different in others?
4. Different?
5. Fundamentally different?

The deliberative process used by the Panel at its meetings involved a series of steps that included determining whether there was a consensus on whether the standards for each program address the issue explicitly, implicitly, or not at all. Second, each Panel member shared their rationale for their independent 1-5 score, and the Panel then engaged in dialogue about the various scores and rationals, leading to the consensus views that are contained in this report. Thus, the 1-5 rating scheme was not used to create a numerical score (e.g., a weighted average or median score) with regard to the collective judgment of the Panel on similarities and differences. Rather, the scores were used as a basis for stimulating dialogue that eventually led to the consensus narrative statements that are now contained in the report.

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APPENDIX C. REFERENCES FOR STANDARDS

Note: This appendix is referenced in Volume I, Section 2 (Standards), Question B (Structure, Hierarchy and Content). The references below for each program can be used to locate the precise language in the programs' standards that address each issue that the panel addressed.

FSC Standards

FSC Key	
P	Principle Number, <i>Ex: P8 is Principle 8, (Document 1.2, The Principles and Criteria of Forest Stewardship)</i>
C	Criterion, <i>Ex: C8.1, (Document 1.2, The Principles and Criteria of Forest Stewardship)</i>
SC	Sub-criterion, <i>Ex: 8.1.a, (The FSC-U.S National Indicators for Forest Stewardship)</i>
NI	National Indicator, <i>Ex: 8.1.a.1, (The FSC-U.S National Indicators for Forest Stewardship)</i>
App.	Applicability Note, <i>Ex: App.8.1 (The FSC-U.S National Indicators for Forest Stewardship)</i>
SW	SmartWood Program (Interim Standards), (SmartWood's <i>Generic Guidelines for Assessing Forest Management</i>) SmartWood (SW), a program of the Rainforest Alliance, is an accredited certification body used in the United States. SW's <i>Generic Guidelines for Assessing Forest Management</i> consists of a series of guidelines that follow the structure of FSC's Principles and Criteria, the purpose of which is to provide forest managers, landowners, forest products industry, scientists, environmentalists, and the general public with information on the aspects of forest management operations that SW evaluates to make certification decisions. These are interim standards that are used by SW until the Regional Standards have been endorsed and approved by the FSC Board.

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SCS	<p>Scientific Certification Systems (Interim Standards), (SCS Generic Interim Standards for Natural Forest and Plantation Forest Management Certification; the Forest Conservation Program: Program Description and Operations Manual)</p> <p>Scientific Certification Systems (SCS) is an accredited certification body used in the United States. SCS has developed the Generic Interim Standards for Natural Forest and Plantation Forest Management Certification, which consists of Performance Indicators (PI) that follow the structure of FSC’s Principles and Criteria. Performance Indicators are used in conjunction with Program Elements (PE). Three sets of evaluation criteria, known as Program Elements, are used in evaluations: A) timber resource sustainability, B) forest ecosystem maintenance, and C) financial and socioeconomic considerations. There are two sets of evaluation criteria contained within each of these three program elements: 1) Natural Forest Management (“NFM”) and 2) Plantation Forest Management (“PFM”). Each set of evaluation criteria has been designed to be fully consistent with the FSC’s Principles and Criteria. These standards are designed to distinguish and recognize “well-managed” operations in which timber products are produced in a manner that sustains the timber resource, maintains the forest ecosystem, and meets minimum financial and socioeconomic criteria. These are interim standards that are used by SCS until the Regional Standards have been endorsed and approved by the FSC Board.</p>
PI	<p>Performance Indicators, Ex: PI6.3 <i>(The Forest Conservation Program: Program Description and Operations Manual)</i></p>
PE	<p>Program Element, Ex: PE A <i>(The Forest Conservation Program: Program Description and Operations Manual)</i></p>
“NFM”	<p>Natural Forest Management Program Element <i>(The Forest Conservation Program: Program Description and Operations Manual)</i></p>
“PFM”	<p>Plantation Forest Management Program Element <i>(The Forest Conservation Program: Program Description and Operations Manual)</i></p>

	Issue	FSC References
ENVIRONMENTAL		
1	Special and Unique Forest Areas	<p>FSC: P9, C9.1, NI9.1.a, App.6.3, C9.2, C9.3, NI9.3.a, NI9.3.b, NI9.3.c, C9.4 SW: P6, P9, C9.1, C9.2, C9.3, C9.4, C10.5 SCS: PI6.3, PI6.4, PI6.10, PI9.1, PI9.2, PI9.3, PI9.4, PI10.5, “NFM” PE B.6, “PFM” PE B.5</p>
2	Use of Chemicals	<p>FSC: C6.6, NI6.6.a, NI6.6.b, NI6.6.c, C6.7, NI6.7.a, NI6.7.b, NI6.7.c, C10.7 SW: P6, C6.6, C6.7 SCS: PI6.6, PI6.7, PI10.7, “NFM” PE B.5, “PFM” PE A.2, PE B.4</p>
3	Use of Genetically Modified Organisms	<p>FSC: C6.8, App.6.8 SW: C6.8</p>

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	Issue	FSC References
		SCS: PI6.8, “NFM” PE B.1, “PFM” PE B.1
4	Use and Management of Exotic Species	FSC: C6.9, NI6.9.a, NI6.9.b, NI10.4.b, SW: C6.8, C6.9, C10.3, C10.4 SCS: PI6.9, PI10.4, PI10.7, “NFM” PE B.1, “PFM” PE B.1
5	Forest Plantations, including Definition, Conversion of Natural Forests to Plantations, and Management	FSC: C6.10, P10, C10.1, C10.5, NI 10.5A, NI10.5B, NI10.5C, C10.9, App.10.9 SW: P1, C6.10, P10, C10.1, C10.2, C10.3, C10.5, C10.8, C10.9 SCS: PI6.10, PI10.1, PI10.2, PI10.3, PI10.5, PI10.8, PI10.9, “PFM”
6	Sustained Yield	FSC: C5.6, NI5.6.a, NI5.6.b SW: C5.6 SCS: PI5.6, PI8.2, “NFM” PE A, PE A.1, PE A.2, “PFM” PE A.1
7	Water Quality and Riparian Zone Protection	FSC: C5.5, C6.1, NI6.1.a, NI6.1.b, C6.5, App.6.5, NI6.5.h, NI6.5.i, C10.6 SW: C5.5, C6.5, C10.6 SCS: PI5.5, PI6.5, PI10.2, PI10.6, “NFM” PE B.4, “PFM” PE B.3
8	Soil Protection	FSC: P6, App.P6, C6.1, NI6.1.a, NI6.1.b, SC6.3.c, NI6.3.c.2, NI6.3.c.4, C6.5, App.6.5, NI6.5.a, NI6.5.b, NI6.5.c, NI6.5.d, NI10.3.a, C10.6 SW: C6.3, C6.5, C10.6 SCS: PI6.3, PI6.5, PI10.6, “NFM” PE B.2, “PFM” PE B.2
9	Forest Protection from Fire, Pathogens, and Disease	FSC: NI6.6.a, NI6.6.b, C6.8, NI6.8.a, SC7.1.c, NI7.1.c.2, C10.7 SW: C6.6, C10.7 SCS: PI6.6, PI6.8, PI10.4, PI10.7, “NFM” PE A.3, PE A.6,
10	Clear-Cutting and Even-Aged Management	FSC: NI6.3.a.2, NI6.3.a.4, NI6.5.d, C10.2, NI10.2.a, NI10.2.b, C10.3 SW: C10.2, C10.3 SCS: PI6.3, PI10.2, PI10.3, “NFM” PE A, PE A.1, PE B.1
11	Forest Regeneration and Reforestation	FSC: NI6.3.a.2, C10.1, NI10.2.b, C10.4, NI10.4.a, NI10.4.b, C10.5, NI10.5.a, NI10.5.b, NI10.5.c SW: C6.9, P10, C10.1, C10.2, C10.4, C10.5 SCS: PI6.3, PI10.1, PI10.3, PI10.4, PI10.8, “PFM” PE A.2
12	Road Building and Maintenance	FSC: C6.5, App.6.5, NI6.5.e, NI6.5.f, NI6.5.g, C10.6 SW: C6.5 SCS: PI6.5, “NFM” PE A.4, “PFM” PE A.2, PE A.3
13	Maintenance and Conservation of Biological Diversity	FSC: P6, App.6, C6.1, NI6.1.a, NI6.1.b, C6.2, App.C6.2, NI6.2.a, NI6.2.b, NI6.2.c, NI6.3.b.1, NI6.3.b.2, C10.2, NI10.3.a, NI10.5.a SW: P6, C6.2, C10.3

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	Issue	FSC References
		SCS: PI6.2, PI6.3, PI10.2, PI10.3, “NFM” PE B.3, “PFM” PE B.1, PE B.5
14	Maintenance of Ecological Function	FSC: P6, App.6, C6.3, SC6.3.a, NI6.3.a.1, NI6.3.a.2, NI6.3.a.3, NI6.3.a.4, SC6.3.b, NI6.3.b.1, NI6.3.b.2, NI6.3.b.3, SC6.3.c, NI6.3.c.1, NI6.3.c.2, NI6.3.c.3, NI6.3.c.4 SW: C6.3, C6.4 SCS: PI6.3, “NFM” PE B, PE B.2, “PFM” PE B
15	Assessment of Environmental Impacts	FSC: P6, App.6, C6.1, NI6.1.a, NI6.1.b, NI6.1.c, NI6.1.d, C6.4, App.6.4, NI6.4.a, NI6.4.b, NI6.4.c, NI6.4.d, NI6.4.e, C6.5, App.6.5, SC8.2.d, NI8.2.d.1, NI8.2.d.2 SW: P6, C6.1, C6.4, C8.2 SCS: PI6.1, “NFM” PE A.6, “PFM” PE A.1
16	Periodic Monitoring of Environmental Conditions and Adaptive Management	FSC: C7.2, NI7.2.a, P8, App.8, C8.1, NI8.1.a, C8.2, SC8.2.a, NI8.2.a.1, NI8.2.a.2, NI8.2.a.3, SC8.2.b, NI8.2.b.1, SC8.2.c, NI8.2.c.1, SC8.2.d, NI8.2.d.1, NI8.2.d.2, NI8.2.d.3, NI8.2.d.4, SC8.2.e, C8.4, NI8.4.a, C9.4, C10.8 SW: C6.5, C7.2, C8.1, C8.2, C8.4, C9.4, C10.8 SCS: PI6.1, PI6.9, PI7.1, PI7.2, PI8.1, PI8.2, PI8.4, PI8.5, PI9.4, PI10.4, PI10.7, PI10.8, “NFM” PE A.6, “PFM” PE A.1, PE B.2
SOCIAL		
17	Consultation and Public Reporting Between Forest Managers and Key Stakeholder Groups and the Surrounding Communities	FSC: C1.6, NI1.6.a, NI1.6.b, NI2.2.b, C2.3, NI2.3.a, NI2.3.b, C7.4, App.7.4, C8.5, App.8.5, NI8.5.a, C9.3 SW: C1.6, C2.3, C4.4, C6.4, C7.4, C8.5, P9, C9.1, C9.2, C9.3, C10.5 SCS: PI1.6, PI2.3, PI3.2, PI4.4, PI5.5, PI7.4, PI8.5, PI9.1, PI9.2, PI9.3, “NFM” PE C.2, “PFM” PE C.2
18	Health and Safety and General Welfare of Employees and Contractors	FSC: C3.4, NI4.1.g, C4.2, NI4.2.a, C4.3, NI4.3.a, NI4.3.b, C4.5, App.4.5, NI4.5.a, NI4.5.b SW: C3.4, P4, C4.2, C4.3, C4.5 SCS: PI4.2, PI4.3, PI4.5, PI6.6, “NFM” PE C.5
19	Compliance with Applicable Laws and Regulations	FSC: P1, C1.1, NI1.1.a, NI1.1.b, NI1.1.c, C1.2, NI1.2.a, C1.3, NI1.3.a, C1.4, NI1.4.a, NI1.4.b, C1.5, NI1.5.a, NI4.1.h, NI7.1.b.4 SW: P1, C1.1, C1.2, C1.3, C1.4, C1.5 SCS: PI1.1, PI1.2, PI1.3, PI1.4, PI1.5, PI4.5, PI6.2, PI6.8
20	Recognition of Indigenous Peoples’ Rights	FSC: P3, App.3, C3.1, NI3.1.a, NI3.1.b, NI3.1.c, C3.2, NI3.2.a, NI3.2.b, C3.3, C3.4, NI3.4.a, NI3.4.b, NI3.4.c SW: P3, C3.1, C3.2, C3.3, C3.4

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	Issue	FSC References
		SCS: PI3.1, PI3.2, PI3.3, PI3.4, “NFM” PE C.2, PE C.3, “PFM” PE C.2
21	Identification and Protection of Archeological, Cultural, and Historic Resources/Sites	FSC: NI2.2.a, C3.3, NI3.3.a, NI3.3.b, NI3.3.c, NI4.4.d SW: C3.3 SCS: C3.3, “NFM” PE C.2
22	Visual Impacts and Aesthetics	FSC: NI4.4.c SCS: PI5.5, PI5.6
23	Education and Outreach	FSC: NI4.1.f, NI4.1.i SW: P4 SCS: PI4.1, PI7.3, “NFM” PE C.4, “PFM” PE C.3
24	Forest Management Research	FSC: C8.2 SW: C10.3 SCS: PI10.6, “NFM” PE B.2, “PFM” PE A.4, PE C.3
25	Public Access and Use Opportunities	FSC: P2, C2.1, NI2.1.a, NI2.1.b, C2.2, NI2.2a, NI7.1.b.5 SW: P2, C2.1, C2.2, C6.2, C10.8 SCS: PI2.1, PI2.2, PI2.3, PI5.5, PI10.8, “NFM” PE C.3
26	Assessment of Social Impacts	FSC: C4.4, App.4.4, NI4.4.a, NI4.4.b, C8.2, SC8.2.d, NI8.2.d.3, C10.8 SW: C4.4, C8.2, C10.8 SCS: PI4.4, PI10.8, “NFM” PE C, “PFM” PE C
27	Contribution of Socioeconomic Benefits to Local Community/Region	FSC: P4, C4.1, NI4.1.a, NI4.1.b, NI4.1.c, NI4.1.d, NI4.1.e, NI4.4a, NI4.4b, NI5.1.d, C5.2, NI5.2.a, C5.4, NI5.4.a SW: P4, C4.1, C4.4, P5, C5.2, C5.4, C10.8 SCS: PI3.4, PI4.1, PI4.4, PI5.2, PI5.4, PI10.8, “NFM” PE C, PE C.2, “PFM” PE C, PE C.2
ECONOMIC and OPERATIONAL		
28	Long-Term Financial Viability of the Forest Operation	FSC: P5, C5.1, NI5.1.a, NI5.1.b, NI5.1.c, C5.2, NI5.2.b, NI5.2.c, NI5.2.d, C5.3, NI5.3.a, C5.4, NI5.4.a, C5.5, C5.6, NI5.6.a, NI5.6.b, SC7.1.d, NI7.1.d.1, NI7.1.d.2, C10.2, NI10.2.a, NI10.2.b, C10.3 SW: P5, C5.1, C5.2, C5.3, C5.4, C5.5, C5.6, C7.1, C10.2, C10.3 SCS: PI5.1, PI5.2, PI5.3, PI5.4, PI5.5, PI5.6, PI7.1, PI8.2, “NFM” PE A, PE A.1, PE C, PE C.1, PE M” PE A.3, PE B.1, PE B.2, PE C, PE C.1, PE C.3
29	Efficiency of Resource Utilization	FSC: C5.3, NI5.3.b, NI5.3.c SW: C5.3

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	Issue	FSC References
		SCS: PI5.3, “NFM” PE A.5
30	Competency and Adequacy of the Forest Management Staff	FSC: NI4.1.f, NI4.1.i, C7.3 SW: C6.5, C7.3 SCS: PI6.2, PI6.5, PI7.3, PI8.3, PI9.1, “NFM” PE C.4, “PFM” PE A.5, PE C.3, PE C.4
31	Management Planning Framework	FSC: P7, C7.1, App.7.1, SC7.1.a, NI7.1.a.1, SC7.1.b, NI7.1.b.1, NI7.1.b.2, NI7.1.b.3, NI7.1.b.4, NI7.1.b.5, NI7.1.b.6, SC7.1.c, NI7.1.c.1, NI7.1.c.2, SC7.1.d, NI7.1.d.1, NI7.1.d.2, SC7.1.e, SC7.1.f, SC7.1.g, SC7.1.h, NI7.1.h.1, SC7.1.i, C7.2, NI7.2.a SW: P7, C7.1, C7.2, C9.3 SCS: PI5.6, PI6.1, PI6.3, PI6.4, PI6.5, PI7.1, PI7.2, PI8.1, PI8.4, PI9.3, PI9.4, PI10.1, PI10.4, PI10.5, PI10.6, PI10.7, “NFM” PE A.6, “PFM” PE A.1, PE A.2

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SFI Standards

SFI Key
<p>CITED DOCUMENTS:</p> <p>SFI-2000 = SFI 2000 standard (this document contains Principles, Objectives, and Performance Measures)</p> <p>SFI-2003 = SFI Verification Measures (this document contains Objectives, Performance Measures, and Core Indicators)</p> <p>SFI-2004 = SFI 2004 standard (this document contains the On-Product Label Use Requirements for the SFI standard)</p> <p>NOTES:</p> <ul style="list-style-type: none"> ▪ A five-digit number (e.g., 4.1.6.1.1) denotes a Performance Measure. In this reference list, a Performance Measure may or may not follow an Objective (e.g., 4.1.6 Objective 6) and it may or may not be followed by a Core Indicator(s) (e.g., CI: 1, 2). In the SFI Verification Measures (SFI-2003), all Performance Measures are preceded by an overarching objective and are followed by Core Indicators. ▪ In this document, Performance Measures (and their associated Core Indicators) that are related to the same Objective are grouped together and separated by a forward slash (/).

	Issue	SFI References
	ENVIRONMENTAL	
1	Special and Unique Forest Areas	SFI-2000 Principle 2.4 SFI-2003 4.1.6 Objective 6 / 4.1.6.1.1; CI: 1, 2
2	Use of Chemicals	SFI-2000 Principle 2.2 SFI-2003 4.1.2.1.3; CI: 1, 2, 3, 4, 5

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	Issue	SFI References
3	Use of Genetically Modified Organisms	SFI-2000 Principle 2.2 SFI-2003 4.1.2.1.6; CI: 1, 2
4	Use and Management of Exotic Species	SFI-2000 Principle 2.2
5	Forest Plantations, including Definition, Conversion of Natural Forests to Plantations, and Management	SFI-2003 4.1.2.1.1; CI: 1, 2, 3, 4 4.1.4 Objective 4 / 4.1.4.1.2; CI: 1 4.1.5.1.3; CI: 1, 2, 3 / 4.1.5.1.4; CI: 1
6	Sustained Yield	SFI-2003 4.1.1 Objective 1 / 4.1.1.1.1; CI: 1, 2, 3, 4 / 4.1.1.1.4; CI: 1, 2, 3 4.1.2 Objective 2 / 4.1.2.1.1; CI: 1, 2, 3, 4 / 4.1.2.1.4; CI: 1, 2, 3 4.2.1.1.1; CI: 1, 5, 6
7	Water Quality and Riparian Zone Protection	SFI-2003 4.1.3 Objective 3 / 4.1.3.1.1; CI: 1, 2 / 4.1.3.1.2; CI: 1, 2 / 4.1.3.1.3 4.2.1.1.2 / 4.2.1.1.4
8	Soil Protection	SFI-2003 4.1.1 Objective 1 / 4.1.1.1.1; CI: 1, 2, 3 4.1.2 Objective 2 / 4.1.2.1.4; CI: 1, 2, 3 4.1.3 Objective 3 / 4.1.3.1.1; CI: 1, 2
9	Forest Protection from Fire, Pathogens, and Disease	SFI-2000 Principle 2.3

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	Issue	SFI References
		SFI-2003 4.1.1.1.2; CI: 1 4.1.2.1.3 / 4.1.2.1.5; CI: 1, 2, 3 4.1.5.1.2
10	Clear-Cutting and Even-Aged Management	SFI-2003 4.1.5.1.2; CI: 1, 2, 3 / 4.1.5.1.3; CI: 1, 2, 3 / 4.1.5.1.4; CI: 1
11	Forest Regeneration and Reforestation	SFI-2003 4.1.1 Objective 1 / CI: 3 4.1.2.1.1; CI: 1, 2, 3, 4 / 4.1.2.1.2; CI: 1 4.1.5.1.3; CI: 1, 2, 3 4.2.1.1.1; CI: 1, 2, 3 / 4.2.1.1.2
12	Road Building and Maintenance	SFI-2003 4.2.1.1.2
13	Maintenance and Conservation of Biological Diversity	SFI-2000 Principle 2.1 SFI-2003 4.1.4 Objective 4 / 4.1.4.1.1 / 4.1.4.1.2; CI: 1 / 4.1.4.1.3; CI: 1, 2 4.1.5.1.4; CI: 1 4.2.1.1.2
14	Maintenance of Ecological Function	SFI-2000 Principle 2.3 SFI-2003 4.1.1.1.1; CI: 1, 2 / 4.1.1.1.2

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	Issue	SFI References
		4.1.3 Objective 3 4.1.4 Objective 4 4.1.5.1.4; CI: 1 4.1.6.1.1
15	Assessment of Environmental Impacts	SFI-2003 4.1.4 Objective 4 / 4.1.4.1.1; CI: 1, 2 4.1.5.1.4; CI: 1
16	Periodic Monitoring of Environmental Conditions and Adaptive Management	SFI-2000 Principle 2.5 SFI-2003 4.1.1 Objective 1 / 4.1.1.1.1; CI: 1, 2 4.1.4.1.2; CI: 1 / 4.1.4.1.3; CI: 1, 3 4.4.1 Objective 11 / 4.4.4.1.1; CI: 1, 2
	SOCIAL	
17	Consultation and Public Reporting Between Forest Managers and Key Stakeholder Groups and the Surrounding Communities	SFI-2000 Principle 2.5 SFI 2003 4.1.2.1.2; CI: 1 4.1.5.1.2; CI: 1 4.2.1.1.4; CI: 1, 2 / 4.2.1.1.6; CI: 3 4.3.1 Objective 9 / 4.3.1.1.1; CI: 1, 2, 3 4.4.1 Objective 11
18	Health and Safety and General	SFI-2003

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	Issue	SFI References
	Welfare of Employees and Contractors	4.1.2.1.3; CI: 1, 2, 3, 4 4.2.1.1.2
19	Compliance with Applicable Laws and Regulations	SFI-2003 4.1.2.1.3; CI: 4 / 4.1.2.1.6; CI: 2 4.1.3.1.1; CI: 2 4.1.4.1.1; CI: 2 4.1.5.1.2; CI: 3 / 4.1.5.1.3; CI: 3 4.2.1.1.2
20	Recognition of Indigenous Peoples' Rights	
21	Identification and Protection of Archeological, Cultural, and Historic Resources/Sites	SFI 2000 Principle 2.4 SFI-2003 4.1.6 Objective 6 / 4.1.6.1.1; CI: 1, 2
22	Visual Impacts and Aesthetics	SFI-2003 4.1.5.1.1; CI: 1, 2 / 4.1.5.1.2; CI: 3 / 4.1.5.1.3; CI: 1, 2, 3 / 4.1.5.1.4; CI: 1 4.1.6.1.1 4.2.1.1.2
23	Education and Outreach	SFI-2003 4.1.1.1.3; CI: 1 4.2.1.1.1; CI: 2 / 4.2.1.1.2; CI: 1, 2 / 4.2.1.1.3; CI: 1 / 4.2.1.1.7 4.3.2.1.1; CI: 1
24	Forest Management Research	SFI-2003 4.1.1.1.2; CI: 1 4.1.3.1.3; CI: 1

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	Issue	SFI References
25	Public Access and Use Opportunities	SFI-2003 4.1.1.1.3; CI: 1
26	Assessment of Social Impacts	SFI 2000 Principle 2.1 Principle 2.5 SFI-2003 4.1.1.1.1; CI: 1
27	Contribution of Socioeconomic Benefits to Local Community/Region	SFI 2000 Principle 2.1 Principle 2.5 SFI-2003 4.1.1 Objective 1 / 4.1.1.1.1; CI: 1 / 4.1.1.1.3; CI: 1 / 4.1.1.1.4; CI: 2, 3 4.1.2 Objective 2 / 4.1.2.1.1; CI: 1 / 4.1.2.1.4; CI: 1, 2, 3 4.1.4.1.3; CI: 1 4.1.5.1.1; CI: 1, 2 / 4.1.5.1.3 4.1.6.1.1 4.2.1.1.1 / 4.2.1.1.2 / 4.2.1.1.3 / 4.2.1.1.5 / 4.2.1.1.7 4.3.1 Objective 9 / 4.3.1.1.1; CI: 1, 2, 3 4.3.2.1.1; CI: 1
	ECONOMIC and OPERATIONAL	
28	Long-Term Financial Viability of the Forest Operation	SFI 2000 Principle 2.2

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		<p>SFI-2003 4.1.1 Objective 1 / 4.1.1.1.1; CI: 1, 2, 3, 4 / 4.1.1.1.2; CI: 1 / 4.1.1.1.4; CI: 1, 2, 3 4.1.2 Objective 2 / 4.1.2.1.1; CI: 1 / 4.1.2.1.4; CI: 1, 2, 3 / 4.1.2.1.5; CI: 1, 2, 3 4.1.3.1.4 4.1.4.1.3 4.2.1.1.1; CI: 1, 2, 3 / 4.2.1.1.2 / 4.2.1.1.7</p>
29	Efficiency of Resource Utilization	<p>SFI-2003 4.1.1 Objective 1 / 4.1.1.1.1; CI: 1, 2 4.1.7 Objective 7 / 4.1.7.1.1; CI: 1, 2</p>
30	Competency and Adequacy of the Forest Management Staff	<p>SFI-2003 4.1.1 Objective 1 / 4.1.1.1.1; CI: 3, 4 / 4.1.1.1.4; CI: 1, 2, 3 4.1.3.1.1; CI: 1, 2 / 4.1.3.1.2; CI: 1, 2 / 4.1.3.1.4; CI: 1, 2 4.1.4.1.1; CI: 1, 2; 4.1.4.1.3; CI: 2 4.1.5.1.1; CI: 1, 2; 4.1.5.1.2; CI: 1, 2, 3; 4.1.5.1.3; CI: 1, 2, 3 4.1.6.1.1; CI: 1, 2 4.1.7.1.1; CI: 1, 2 4.2.1.1.2; CI: 1, 2; 4.2.1.1.6; CI: 1, 2, 3</p>
31	Management Planning Framework	<p>SFI-2003 4.1.1 Objective 1 / 4.1.1.1.1; CI: 5, 6 / 4.1.1.1.4; CI: 1, 2, 3 4.1.2.1.1; CI: 1, 2, 3, 4 / 4.1.2.1.4; CI: 1, 2, 3 4.1.3 Objective 3 / 4.1.3.1.1; CI: 1, 7 / 4.1.3.1.2; CI: 1, 2 / 4.1.3.1.4; CI: 1, 2 4.1.4.1.1; CI: 1, 2 4.1.5.1.1; CI: 1, 2 / 4.1.5.1.2; CI: 1, 2, 3 / 4.1.5.1.3; CI: 1, 2, 3 / 4.1.5.1.4; CI: 1 4.1.6.1.1; CI: 1, 2 4.1.7.1.1; CI: 1, 2 4.2.1.1.2; CI: 1, 2 / 4.2.1.1.6; CI: 1, 2, 3 / 4.2.1.1.8; CI: 1, 2 4.3.2.1.2; CI: 1 4.4.4.1.1; CI: 1, 2</p>