

Small Lands Group Certification Module: Guidance for Implementation

Approved July: 2021

Introduction

This guidance document supports implementation of the Small Lands Group Certification Module (the Module). This jointly developed program of the Sustainable Forestry Initiative (SFI) and American Forest Foundation (AFF) is built on the foundation of SFI's 2022 Fiber Sourcing Standard, and the AFF 2021-2026 Standards of Sustainability for certification under the American Tree Farm System. The guidance below applies only to the application of this Small Lands Group Certification Module and may depart from guidance or interpretations that apply to the SFI 2022 Fiber Sourcing Standard or the AFF 2021-2026 Standards of Sustainability.

Recognizing the dynamic nature of worldwide trends in third-party certification and sustainability assurances as well as the need for periodic re-evaluation of this program's alignment with SFI's and AFF's strategic direction, either organization may, at any time, choose to pursue modifications to the module or its terms of implementation. If modifications are desired, module users will be notified by SFI of the intent, process, timeline, and potential impacts to program delivery.

Guidance

The following guidance is structured in the form of frequently asked questions about Module implementation. Interested parties are strongly encouraged to consult the full Module text located at [insert hyperlink] prior to notification of SFI/AFF of intent to implement the module.

1. Do I need to notify SFI and AFF if I want to use this Module?

Yes. If you are an SFI Certified Organization certified to the SFI 2022 Fiber Sourcing Standard, please notify both Leigh Peters at AFF (lpeters@forestfoundation.org) and Gregor Macintosh at SFI (gregor.macintosh@forests.org) of your intent to implement the Small Lands Group Certification Module. This will enable AFF and SFI to provide your organization with technical support and resources to support implementation of the Module, as well as tools for reporting and other functions.

2. What if a landowner decides to sell their property?

When a landowner sells their property, it is no longer under the scope of the certificate and would need to be updated in the ATFS and/or SFI database.

3. Is a landowner's time in the group certification limited?

No. The Small Lands Group Certification Module does not specify a minimum or maximum timeline for which a landowner must be enrolled in the group, recognizing this decision rests entirely with the landowner, as personal circumstances or preferences of landowners change. Similarly, SFI Certified Organizations may wish to transition a landowner out of certification in their

group for some reason. Through the Small Lands Group Certification Module, SFI Certified Organizations - as group managers - and landowners both commit to sustainable forestry, including ensuring that critical practices such as reforestation are supported and verified under this certification. If there is a desire by a participating landowner, or the SFI Certified Organization Group Manager to transition lands out of the group, the Certified Organizations should notify AFF such that AFF can provide that landowner with ongoing resources and support to encourage long-term stewardship.

4. Can a landowner be in multiple groups?

No. To ensure accurate certification information and to avoid “double counting” of certified acres and landowners, a particular parcel may only be enrolled in one certification at a time, via the Small Lands Group Certification Module, an ATFS Independently Managed Group (IMG) or ATFS State Programs. Group Managers in the United States must check the ATFS Verification Database and [SFI Database](#) before enrolling a parcel in their group to ensure that it is available to join their group. Group Managers wishing to transition landowners from a State ATFS Program or IMG to a module must do so with landowners’ full consent and must notify both the State Program Administrator/IMG Manager *and* AFF’s ATFS Certification Manager of their intent to do so. Group Managers must maintain and update members of the group organization and report to AFF or update the ATFS database to reflect entries and departures of Group Members from the Group Organization.

5. Can a company have a Wood and Fiber Supply Basin Plan that is different from a nearby competitor’s? Yes. The Small Lands Group Certification Module requires a Wood and Fiber Supply Basin plan, encompassing all required elements enumerated in Module sections 4.1 and 4.2. Each SFI Certified Organization may develop their own such plan reflecting their supply basin, operations and analyses, which may differ from any neighboring facility or competitor. These plans must be made publicly available, per the PEFC ST 1003-2018 requirement, excluding confidential, proprietary and personal information. In addition, SFI Certified Organizations may utilize Landscape Management Plans (LMPs) developed by AFF and partners through multi-stakeholder processes, if they are available in the SFI Certified Organization’s region of sourcing. If utilized, these LMPs would need supplemental information to address specific Module requirements, including growth and drain trends analysis and related management measures.

6. Can an SFI Certified Organizations leverage activities undertaken by a SFI Implementation Committee (SIC) or American Tree Farm System (ATFS) State Committee in their implementation of the Module and management of their group?

Yes. A Certified Organization may be able to gain some benefit of collective actions undertaken by an SIC or ATFS State Committee, while observing antitrust laws and regulations. This may include development of Wood and Fiber Supply

Basin Plans elements, monitoring efforts or use of landowner education materials.

7. How would this Module be audited for an SFI Certified Organization with multiple sites?

This module uses a sampling procedure similar to and designed to complement a multisite SFI 2022 Fiber Sourcing Standard audit but includes guidelines for sampling of landowners and landowner agents. These guidelines are in [SFI Section 10 - SFI 2022 Audit Procedures and Auditor Qualification and Accreditation](#), Appendix 1, Audits of Multisite Organizations.

8. ATFS has not historically allowed loggers to conduct inspections and certifications. But, this Module allows that. How can we ensure integrity of the ATFS Standard is upheld? What safeguards are in place?

The Small Lands Group Certification Module enables “*landowner agents*” including loggers, contractors, wood dealers and other qualified resource professionals to carry out evaluations of properties to evaluate eligibility of the property for entry into the certified group. However, there are several safeguards in place. First, all landowner agents must be trained to participate in the group (specified by sections 3.1.8 and 3.1.9). Next, because the SFI Certified Organization holds their own certificate, that SFI Certified Organization is fully responsible for ensuring that the Module and the ATFS Standards encompassed in the module are fully conformed to, including through the actions of their *landowner agent* members. Further, any risks or adverse impacts associated with the actions of *landowner agents* within a company’s group are fully contained within that Certified Organization’s certificate and would not have an impact on the status of other certificates including other Small Lands Group Certification Module certificate holders, ATFS IMGs, ATFS State Programs, or the certification status of any other landowners certified through those certificates.

9. Can this Module certify a portion of a parcel?

This Module requires certification of an entire contiguous parcel. Contiguous parcels are discrete parcels that share a boundary line or corner point and are held under the same legal ownership name. A landowner may choose to certify only a portion of their entire property portfolio but may not exclude a portion of a contiguous parcel that does not meet the Small Lands Group Certification Module requirements.

10. What happens to a Small Lands Module Group if a mill changes hands or a company’s strategy changes?

Recognizing that ownership of mills and companies, individual company strategies and market conditions are subject to change, SFI Certified Organizations are encouraged to develop policies and procedures that support the ongoing integrity of the established group, considering changing conditions. In the case that a company moves to dissolve a group, the SFI Certified Organization will notify and coordinate with AFF and SFI to provide landowner members with alternative certification options and ongoing resources and support to encourage long-term stewardship.

11. How will interpretations of the Module be developed?

As the need for interpretations arise, Small Lands Module Group Managers and Members should submit requests and questions to both Leigh Peters at AFF (lpeters@forestfoundation.org) and Gregor Macintosh at SFI (gregor.macintosh@forests.org). Interpretations will be jointly developed by AFF and SFI, reviewed by the AFF/SFI joint Task Group, and approved by both organizations' respective technical governance bodies before interpretations are made effective.