



SUSTAINABLE FORESTRY INITIATIVE

SFI-00001

June 17, 2022

Attn: Vanessa A. Countryman
Secretary, Securities and Exchange Commission
100 F Street NE
Washington, DC 20549-1090

Re: File Number S7-10-22, the Enhancement and Standardization of Climate-Related Disclosures for Investors

Chair
Michael P. Doss

Vice Chair
Patricia Layton

Secretary and Treasurer
Brent Keefer

President and CEO
Kathy Abusow

ENVIRONMENTAL SECTOR:

Terry Baker
CEO, Society of American Foresters

Jad Daley
President and CEO, American Forests

Catherine Grenier
President and CEO,
Nature Conservancy Canada

Dan Lambe
Chief Executive, Arbor Day Foundation

Mike Parr
President, American Bird Conservancy

SOCIAL SECTOR:

Ebonie Alexander
Executive Director
Black Family Land Trust Inc.

Jeff Bromley
Chair, USW Wood Council

Ashley Hoffman
Executive Director, Kentucky Association
for Environmental Education

Lennard Joe
Chair, Scw'exmx Tribal Council

Patricia Layton (Vice Chair)
Director, Wood Utilization + Design Institute,
Clemson University

Ellen Shultzabarger
State Forester and Director,
Pennsylvania Bureau of Forestry

ECONOMIC SECTOR:

Michael P. Doss (Chair)
President and CEO
Graphic Packaging International, Inc.

Jim Irving
Co-CEO, J.D. Irving, Limited

Don Kayne
CEO, Canfor Corporation and Canfor Pulp

Brent Keefer (Secretary-Treasurer)
Chief Executive Officer
American Forest Management, Inc.

The Sustainable Forestry Initiative (SFI) appreciates this opportunity to provide the below comments to the Securities and Exchange Commission (SEC) regarding its proposed rules on The Enhancement and Standardization of Climate-Related Disclosures for Investors (File Number S7-10-22), which would require registrants to disclose information about climate-related risks, risk management processes, and impacts on business.

SFI advances sustainability through forest-focused collaboration. We are an independent, nonprofit organization that works collaboratively with our network – consisting of conservation groups, federal, state and county governments, Indigenous peoples, private landowners, manufacturers, universities and more – to leverage SFI-certified forests and products as powerful tools to help solve sustainability challenges such as climate action, conservation of biodiversity, provision of water, education of future generations, and sustainable economic development. We invite you to learn more at forests.org.

Because of new climate-smart forestry requirements in the [SFI 2022 Forest Management Certification Standard](#), SFI is well positioned to support climate disclosure. We encourage the SEC to recognize the contributions of voluntary standards such as SFI in climate disclosure requirements.

The new climate smart forestry objective in the SFI standard requires SFI-certified organizations to identify and address climate change risks to forests and forest operations and develop adaptation objectives and strategies. It also requires certified organizations to identify and address opportunities to mitigate effects of climate change associated with forest operations.

SFI-certified organizations will be required to report annually to SFI on progress toward achieving climate change strategies and plans and measures to mitigate climate change associated with forest operations. Certified organizations are also required to have a program to identify and address GHG emissions associated with forest operations within their operational control.

These requirements not only provide a comprehensive approach to climate-smart forestry on the ground but also constitute a supply chain tracking system (chain of custody) that provides assurances about forest management and products sourced through SFI's certification system.

The reach of SFI's certification requirements is significant. SFI-certified organizations include private companies, investment managers, state and county agencies, tribes, universities, conservation and community entities, and others.

SFI certification is backed by third-party independent verification to ensure that all the requirements set out in the SFI standard and supporting documents are appropriately met. Accredited and independent certification bodies evaluate planning, procedures and processes in the forest, in the mill or in the plant to ensure they conform to SFI requirements.

SFI uses a voluntary consensus process to set standards, in alignment with the criteria outlined in OMB Circular A-119 on Voluntary Consensus Standards. We are committed to regularly reviewing and updating all of our standards. The SFI 2022 Standards included input from more than 2,300 stakeholders from the conservation community, Indigenous communities, the forest products sector, brand owners, private forest landowners and public forest managers, government agencies, trade associations, landowner associations, academia, and the public.

Thank you for your consideration of our comments and would be pleased to provide any additional information that may be helpful.

Regards,



Nadine Block
Senior Vice President, Community and Government Relations
