

SFI FIBER SOURCING MODULE TO SUPPORT EUDR DUE DILIGENCE REQUIREMENTS

OPTIONAL MODULE

APPROVED MARCH 20, 2024
UPDATED AUGUST 30, 2024



forests.org



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1.1 SCOPE

What the *Fiber Sourcing Standard* Does:

The *SFI 2022 Fiber Sourcing Standard* promotes responsible *forestry* based on 13 *Principles*, 11 *Objectives*, 29 *Performance Measures* and 59 *Indicators*. These *fiber sourcing* requirements include measures to broaden the practice of *biodiversity*, use *forestry best management practices* to *protect* water quality, provide outreach to landowners and utilize the services of forest management and harvesting professionals.

What the *Fiber Sourcing Standard* Covers:

The *SFI 2022 Fiber Sourcing Standard* applies to any organization with a *fiber sourcing* program that acquires roundwood or field-manufactured or primary-mill residual chips to support a forest products facility.

Certified organizations that source all of their primary sources from forests certified to the *SFI Forest Management Standard*, *American Tree Farm Standard* or *CSA Z809 Standard* do not have to certify to the *SFI Fiber Sourcing Standard*.

Certified organizations that do not own a manufacturing facility but who purchase roundwood for the purposes of reselling without a SFI claim are not required to certify to the *SFI Fiber Sourcing Standard*.

Geographic Application of the *Fiber Sourcing Standard*:

The *SFI 2022 Fiber Sourcing Standard* applies to organizations in the United States and Canada that procure wood domestically or globally.

What the SFI Fiber Sourcing Module to Support EUDR Due Diligence Requirements Covers

This module allows Operators or Traders to collect, process, and communicate the necessary data supporting the EUDR due diligence requirements.

Certification to the module does not by itself demonstrate compliance with the full requirements of the EUDR.

Who Can Use the SFI Fiber Sourcing Module to Support EUDR Due Diligence Requirements:

This module applies to *Operators* or *Traders* as defined by the *European Union Deforestation Regulation (EUDR)*, and any *Certified Organization* that is a supplier to the *operator* and *trader* and needs to demonstrate conformance to the due diligence requirements of the EUDR.

1.2 ADDITIONAL REQUIREMENTS

Certified organizations that own or have management authority for forestlands must also conform to the *SFI 2022 Forest Management Standard*.

Use of the SFI on-product labels and claims shall follow Section 6 — Rules for Use of *SFI On Product Labels and Off-Product Marks* as well as ISO 14020:2000.

Certified Organizations that wish to align with the requirements of the EUDR and include these requirements within the scope of their certification may do so by including Objective 12 of this Module within the scope of their certification. The organization defined as *operator* and *trader* shall retain its full responsibility for its compliance with the regulation.

1.3 REFERENCES

This standard incorporates, by dated or undated reference, provisions from other publications. These normative and informative references are cited at the appropriate places in the text and the publications are listed hereafter. For dated and undated references, the latest edition of the publication applies.

Normative references

- i. ISO/IEC 17021:2015 — Conformity Assessment — Requirements for bodies providing audit and certification of management systems
- ii. ISO/IEC Guide 2:2004 Standardization and related activities — General vocabulary
- iii. Section 8 — SFI Policies
- iv. Section 10 — SFI 2022 Audit Procedures and *Auditor* Qualifications and Accreditation
- v. Section 11 — Communications and Public Reporting
- vi. Section 14 — SFI Definitions
- vii. Interpretations for the Requirements for the SFI 2022 Program



viii. REGULATION (EU) 2023/1115 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 31 May 2023 on the making available on the Union market and the export from the Union of certain commodities and products associated with deforestation and forest degradation and repealing Regulation (EU) No 995/2010.

For the purposes of this standard, the relevant definitions given in ISO/IEC Guide 2:2004 apply, together with the definitions in the SFI Definitions (Section 14).

For purposes of this module, the following definitions are extracted verbatim from the EUDR. For the complete list of EUDR definitions, visit their website at <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32023R1115>.

- **Deforestation**
the conversion of forest to agricultural use, whether human-induced or not.
- **Deforestation-free**
(a) that the relevant products contain, have been fed with or have been made using, relevant commodities that were produced on land that has not been subject to deforestation after 31 December, 2020; and (b) in the case of relevant products that contain or have been made using wood, that the wood has been harvested from the forest without inducing forest degradation after 31 December, 2020.
- **Forest Degradation**
structural changes to forest cover, taking the form of the conversion of: (a) primary forests or naturally regenerating forests into plantation forests or into other wooded land; or (b) primary forests into planted forests.
- **EUDR**
REGULATION (EU) 2023/1115 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 31 May 2023 on the making available on the Union market and the export from the Union of certain commodities and products associated with deforestation and forest degradation and repealing Regulation (EU) No 995/2010.
- **Geolocation**
the geographical location of a plot of land described by means of latitude and longitude coordinates corresponding to at least one latitude and one longitude point and using at least six decimal digits; for plots of land of more than four hectares used for the production of the relevant commodities other than cattle, this shall be provided using polygons with sufficient latitude and longitude points to describe the perimeter of each plot of land.
- **Naturally regenerating forest**
forest predominantly composed of trees established through natural regeneration; it includes any of the following: (a) forests for which it is not possible to distinguish whether planted or naturally regenerated; (b) forests with a mix of naturally regenerated native tree species and planted or seeded trees, and where the naturally regenerated trees are expected to constitute the major part of the growing stock at stand maturity; (c) coppice from trees originally established through natural regeneration; (d) naturally regenerated trees of introduced species.
- **Negligible risk**
the level of risk that applies to relevant commodities and relevant products, where, on the basis of a full assessment of product-specific and general information, and, where necessary, of the application of the appropriate mitigation measures, those commodities or products show no cause for concern as being not in compliance with EUDR Article 3, point (a) or (b).
- **Operator**
any natural or legal person who, in the course of a commercial activity, places relevant products on the market or exports them.
- **Other wooded land**
land not classified as 'forest' spanning more than 0,5 hectares, with trees higher than 5 metres and a canopy cover of 5 to 10 %, or trees able to reach those thresholds in situ, or with a combined cover of shrubs, bushes and trees above 10 %, excluding land that is predominantly under agricultural or urban land use.
- **Plantation forest**
a planted forest that is intensively managed and meets, at planting and stand maturity, all the following criteria: one or two species, even age class, and regular spacing; it includes short rotation plantations for wood, fibre and energy, and excludes forests planted for protection or ecosystem restoration, as well as forests established through planting or seeding, which at stand maturity resemble or will resemble naturally regenerating forests.
- **Planted forest**
forest predominantly composed of trees established through planting and/or deliberate seeding, provided that the planted or seeded trees are expected to constitute more than 50 % of the growing stock at maturity; it includes coppice from trees that were originally planted or seeded.
- **Primary forest**
naturally regenerated forest of native tree species, where there are no clearly visible indications of human activities and the ecological processes are not significantly disturbed.

- **Relevant commodities**
cattle, cocoa, coffee, oil palm, rubber, soya and wood. In relation to wood, the relevant commodity is limited to wood harvested after June 29, 2023.
- **Relevant products**
products listed in Annex I of the EUDR that contain, have been fed with or have been made using relevant commodities.
- **SME**
micro, small and medium-sized undertakings as defined in Article 3 of Directive 2013/34/EU of the European Parliament and of the Council (19) 1 under which an organization is not an SME if, on their balance sheet dates, they exceed the limits of at least two of the three following criteria:
balance sheet total: EUR 20 000 000;
net turnover: EUR 40 000 000;
average number of employees during the financial year: 250
- **Trader**
any person in the supply chain other than the operator who, in the course of a commercial activity, makes relevant products available on the market.

Informative References

- ISO 14001:2015 Environmental Management Systems — Specification with guidance for use
- PEFC ST 1003:2018 Sustainable Forest Management Requirements, November 28, 2018
- Section 7 — Guidance to SFI 2022 Standards
- Section 9 — SFI Standards Development and Interpretations Process
- Section 12 — Public Inquiries and Official Complaints
- Section 13 — Optional Modules
- EUDR Frequently Asked Questions -
https://green-business.ec.europa.eu/deforestation-platform-and-other-eudr-implementation-tools_en#frequently-asked-questions

1.4 FIBER SOURCING STANDARD PRINCIPLES

Certified organizations believe forest landowners have an important stewardship responsibility and a commitment to society, and they recognize the importance of maintaining viable commercial, family forest, and *conservation* forest land bases. They support *sustainable* forestry on forestland they manage and promote it on other lands. They support efforts to safeguard private property rights, and to help all private landowners manage their forestland sustainably. In keeping with this responsibility, *Certified organizations* shall have a written *policy* (or *policies*) to implement and achieve the following *principles*:

1. Sustainable Forestry

To practice *sustainable forestry* to meet the needs of the present while promoting the ability of future generations to meet their own needs by practicing a land stewardship ethic that integrates *reforestation* and the managing, growing, nurturing and harvesting of trees for useful products, and for the provision of *ecosystem services* such as the *conservation* of soil, air and water quality and quantity, climate change adaptation and mitigation, *biological diversity*, *wildlife* and *aquatic habitats*, recreation and aesthetics.

2. Forest Productivity and Health

To provide for regeneration after harvest, maintain the health and productive capacity of the forest land base, and to *protect* and maintain *long-term* soil health and *productivity*. In addition, to *protect* forests from economically, environmentally and socially undesirable impacts of wildfire, pests, diseases, *invasive species*, and other damaging agents and thus maintain and improve *long-term forest health* and *productivity*.

3. Protection of Water Resources

To *protect* and maintain the water quality and quantity of water bodies and *riparian* areas and to conform with forestry *best management practices* to *protect* water quality, to meet the needs of both human communities and ecological systems.

4. Protection of Biological Diversity

To manage forests in ways that protect and promote *biological diversity*, including animal and plant species, *wildlife habitats*, *ecologically and culturally important species*, threatened and endangered species (i.e., *Forest with Exceptional Conservation Values*) and native *forest cover types* at multiple scales.

5. Aesthetics and Recreation

To manage the visual impacts of forest operations, and to provide recreational opportunities for the public.



6. *Protection of Special Sites*

To manage lands that are geologically or culturally important in a manner that takes into account their unique qualities.

7. *Legal Compliance*

To comply with applicable federal, provincial, state, and local *forestry* and related environmental laws, statutes, and regulations.

8. *Research*

To support advances in sustainable forest management through *forestry* research, science, and technology.

9. *Training and Education*

To improve the practice of sustainable *forestry* through training and education *programs*.

10. *Community Involvement and Social Responsibility, and respect for Indigenous Rights*

To broaden the practice of *sustainable forestry* on all lands through community involvement, socially responsible practices, and through recognition and respect of *Indigenous Peoples'* rights and *traditional forest-related knowledge*.

11. *Transparency*

To broaden the understanding of forest certification to the *Fiber Sourcing* Standard by documenting certification audits and making the findings publicly available.

12. *Continual Improvement*

To continually improve the practice of forest management, and to monitor, measure and report performance in achieving the commitment to *sustainable forestry*.

13. *Responsible Fiber Sourcing*

To use and promote sustainable forestry across a diversity of ownership and management types in the United States and Canada that is both scientifically credible and socially, environmentally, and economically responsible and to avoid sourcing from *controversial* sources both domestically and internationally.

1.5 SFI 2022 FIBER SOURCING OBJECTIVES

A summary of the *SFI 2022 Fiber Sourcing* Standard Objectives follows:

Objective 1. *Biodiversity in Fiber Sourcing*

To address the practice of *sustainable forestry* by conserving biological diversity.

Why it Matters: Conserving biological diversity protects wildlife habitat and ensures healthy forests.

Objective 2. *Adherence to Best Management Practices*

To broaden the practice of *sustainable forestry* through *best management practices* to *protect* water quality.

Why it Matters: Protecting water quality and quantity helps ensure safe and abundant drinking water for all.

Objective 3. *Use of Qualified Resource Professionals, Qualified Logging Professionals and Certified Logging Companies*

To promote and utilize *qualified logging professionals*, *qualified resource professionals* and *certified logging companies*.

Why it Matters: Training logging professionals helps landowners implement effective forest management practices.

Objective 4. *Legal and Regulatory Compliance*

To comply with all applicable laws and regulations including international, federal, provincial, state, and *local*.

Why it Matters: Compliance with all laws ensures the protection of the environmental and social values of forests.



Objective 5. *Forestry Research, Science, and Technology*

To invest in research, science, and technology, upon which sustainable forest management decisions are based.

Why it Matters: Investing in forest research means healthier, more productive forests.

Objective 6. *Training and Education*

To improve the implementation of *sustainable forestry* practices through appropriate training and education *programs*.

Why it Matters: Training and educating foresters means forest management plans are more accurately implemented, ensuring the well-being of our forests.

Objective 7. *Community Involvement and Landowner Outreach*

To broaden the practice of *sustainable forestry* through public outreach, education, and involvement and to support the efforts of *SFI Implementation Committees*.

Why it Matters: Outreach and education improves the public's understanding of how important sustainable forestry is to local and global issues.

Objective 8. *Public Land Management Responsibilities*

To participate and implement sustainable forest management on *public lands*.

Why it Matters: Protects the environmental, social, and economic values of public forests.

Objective 9. *Communications and Public Reporting*

To increase transparency and to annually report progress on conformance with the *SFI Fiber Sourcing Standard*.

Why it Matters: Reporting the results of third-party audits increases the public's understanding of forest certification.

Objective 10. *Management Review and Continual Improvement*

To promote continual improvement in the practice of *sustainable forestry* by conducting a management review and monitoring performance.

Why it Matters: Encouraging continual improvement of sustainable forestry practices, a cornerstone of sustainable forestry.

Objective 11. *Avoid Controversial Sources*

To manage the risk of sourcing fiber products from *controversial sources*.

Why it Matters: A due diligence system minimizes the risk of sourcing from controversial sources whether in the United States, Canada or offshore.

OBJECTIVE TO SUPPORT EUDR DUE DILIGENCE REQUIREMENTS

Objective 12. *Avoid EUDR non-compliant Sources.*

To manage the risk of producing relevant *products* or *relevant commodities* that are non-compliant with the *EUDR*.

Why it Matters: The *EUDR* requires specific processes and practices to manage the risk of sourcing fiber from *deforestation* and *forest degradation*. As these processes are not fully aligned with Objective 1-11 of the *SFI 2022 Fiber Sourcing Standard* an extra voluntary objective is provided to support EUDR due diligence requirements. This allows *Certified Organizations* to include Objective 12 within the scope of their certification as part of their due diligence system for supporting *EUDR* requirements.

1.6 *SFI 2022 FIBER SOURCING REQUIREMENTS*

Objective 1. *Biodiversity in Fiber Sourcing*

To address the practice of *sustainable forestry* by conserving *biological* diversity.



Performance Measure 1.1. Promotion and *conservation* of *biological* diversity.

Indicators:

1. *Certified organizations* shall address conservation of *biodiversity*, individually and/or through cooperative efforts involving *SFI Implementation Committees*, through a *Program* that includes one or more of the following:
 - a. promotion of *biological diversity* concepts utilizing information from organizations such as the World Resources Institute, The Nature Conservancy, NatureServe, Conservation International, State Wildlife Action Plans, State Forest Action Plans and assessments;
 - b. conducting local and regional level *landscape* assessments;
 - c. involvement with local or regional *conservation* efforts;
 - d. use of relevant information on *biological diversity* from credible sources (such as those noted above) in approved training and education programs; and
 - e. other credible approaches.

Performance Measure 1.2. Promotion and *conservation* of *Forests with Exceptional Conservation Value*.

Indicators:

1. *Certified organizations* shall conduct an assessment, individually and/or through cooperative efforts involving *SFI Implementation Committees*, of *Forests with Exceptional Conservation Value*, defined as *critically imperiled* and *imperiled* species and ecological communities, within their *wood and fiber supply area(s)* and make the summary of the assessment available to *wood producers*.
2. Program to address *Forests with Exceptional Conservation Value* (*critically imperiled* and *imperiled* species and ecological communities) for all harvest operations through fiber sourcing activities such as:
 - a. use of *qualified logging professionals*, *certified logging companies* (where available), and *qualified resource professionals*; or
 - b. training program for *qualified logging professionals* on how to recognize and *protect Forests with Exceptional Conservation Value*; or
 - c. through in-the-forest verification by *certified logging companies*; or
 - d. forest landowner outreach; or
 - e. *SFI Implementation Committee* involvement in the assessment of *Forests with Exceptional Conservation Value*, and development of recommendations for *conservation*.
3. *Certified organizations* shall conduct and incorporate the results of a *Forests with Exceptional Conservation Value* (*critically imperiled* and *imperiled* species and ecological communities) assessment to promote conservation of *Forests with Exceptional Conservation Value* for purchased *stumpage*.

Objective 2. Adherence to *Best Management Practices*

To broaden the practice of *sustainable forestry* through *best management practices* to *protect* water quality.

Performance Measure 2.1. *Certified organizations* shall clearly define and implement policies to ensure that facility inventories and *fiber sourcing* activities do not compromise adherence to the *principles* of *sustainable forestry*.

Indicators:

1. Use of written agreements for the purchase of raw material sourced directly from the forest is required and must include provisions requiring the use of *best management practices*.
2. Program to address adverse weather conditions.
3. *Certified organizations* shall clearly define their *fiber sourcing policies* in writing and make them available to *wood producers*.

Performance Measure 2.2. *Certified organizations* shall, individually or through cooperative efforts monitor the use of *best management practices* relative to scale.

Indicators:

1. A *verifiable monitoring* system to:
 - a. confirm that harvests of *purchased stumpage* comply with *best management practices*;
 - b. monitor the use of *best management practices* by *wood producers* supplying the *certified organization*; and
 - c. evaluate use of *best management practices* across the *wood and fiber supply area*.
2. Use of information from the *verifiable monitoring* system to maintain rates of conformance to *best management practices* and to identify areas for improved performance.



Objective 3. Use of Qualified Resource Professionals, Qualified Logging Professionals and Certified Logging Companies

To promote and utilize *qualified logging professionals, qualified resource professionals and certified logging companies*.

Performance Measure 3.1. *Certified organizations* shall promote the use of *qualified logging professionals, qualified resource professionals and/or certified logging companies* to improve *sustainable forestry* through their relationships with *wood producers* and landowners.

Indicators:

1. Program to promote the use of *qualified logging professionals, qualified resource professionals and/or certified logging companies* where available.

Performance Measure 3.2. *Certified organizations*, through their relationships with *wood producers* and landowners, shall maximize the delivery of raw materials from *qualified logging professionals and/or certified logging companies*.

Indicator:

1. List of *qualified logging professionals and/or certified logging companies* maintained by an *certified organization*, state or provincial agency, loggers' association, or other organization.
2. *Certified organizations* shall have written agreements for the use of *qualified logging professionals or wood producers* that have completed training programs and are recognized as *qualified logging professionals and/or certified logging companies*.

Objective 4. Legal and Regulatory Compliance

To comply with all applicable laws and regulations including international, federal, provincial, state, and *local*.

Performance Measure 4.1. *Certified organizations* shall comply with all applicable federal, provincial, state, and *local forestry* and related and environmental laws and regulations.

Indicators:

1. Access to relevant laws and regulations in appropriate locations.
2. System to achieve compliance with applicable international, federal, provincial, state, or local laws and regulations.
3. Demonstration of commitment to legal compliance through *available regulatory action information*.

Performance Measure 4.2. *Certified organizations* shall take appropriate steps to comply with all applicable social laws at the federal, provincial, state, and local levels in the country where the *certified organization* operates.

Indicator:

1. Written *policy* demonstrating commitment to comply with social laws, such as those covering civil rights, equal employment opportunities, gender equality, diversity inclusion, anti-discrimination and anti-harassment measures, workers' compensation, *Indigenous Peoples'* rights, workers' and communities' right to know, prevailing wages, workers' right to organize, and occupational health and safety which meet the spirit and intent of the International Labour Organization (ILO) Declaration on the Fundamental Principles and Rights at Work (1998).

Objective 5. Forestry Research, Science and Technology

To invest in research, science, and technology, upon which sustainable forest management decisions are based.

Performance Measure 5.1. *Certified organizations* shall individually and/or through cooperative efforts involving *SFI Implementation Committees*, associations or other partners provide in-kind support or funding for forest research to improve sustainable management of forest resources, and the environmental benefits and performance of forest products.

Indicators:

1. Financial or in-kind support of research, collaboratives, or knowledge transfer to address key themes of relevance in the region of operations as identified by *certified organizations* local *stakeholders*, communities and/or *Indigenous Peoples*. Examples could include, but are not limited to, the following topics:
 - a. climate change adaptation and mitigation;
 - b. water quality and quantity;
 - c. biodiversity, *Forests with Exceptional Conservation Value*, and species maintenance and recovery;
 - d. *landscape* ecology;
 - e. Indigenous traditional *ecological knowledge*;
 - f. *ecosystem* services or non-timber *forest products*;
 - g. community engagement;

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- h. *forest health* and *productivity*;
 - i. support for Forest Inventory Analysis (FIA)
 - j. SFI sponsored conservation research;
 - k. the role of forests in the bioeconomy, and
 - l. or similar themes, which build broader understanding of the benefits and effects of sustainable forest management or sustainable supply chains.

2. Ensure that knowledge gained through research is shared, to the extent possible, to positively influence sustainable forest management.

Performance Measure 5.2. *Certified organizations* shall individually and/or through cooperative efforts involving *SFI Implementation Committees*, associations or other partners develop, contribute to, or use national, state, provincial or regional analyses in support of their *sustainable forestry programs*.

Indicator:

1. Participation, individually and/or through cooperative efforts involving *SFI Implementation Committees* and/or associations at the national, state, provincial or regional level, in the development of information such as:
 - a. regeneration assessments;
 - b. *growth and drain* assessments;
 - c. *best management practices* implementation and conformance;
 - d. *biodiversity conservation* information for family forest owners; and
 - e. social, cultural, or economic benefit assessments.

Performance Measure 5.3. *Certified organizations* shall individually and/or through cooperative efforts involving *SFI Implementation Committees*, associations or other partners broaden the awareness of *climate change* impacts on forests, *wildlife*, and *biological diversity*.

Indicators:

1. Where available, monitor information generated from regional climate models on *long-term forest health*, *productivity*, and *economic viability*.
2. *Certified organizations* are knowledgeable about *climate change* impacts on *wildlife*, *wildlife habitats* and *conservation of biological diversity* through international, national, regional, or local *programs*.

Objective 6. Training and Education

To improve the implementation of *sustainable forestry* practices through appropriate training and education programs.

Performance Measure 6.1. *Certified organizations* shall require appropriate training of personnel and contractors so that they are competent to fulfill their responsibilities under the *SFI 2022 Fiber Sourcing Standard*.

Indicators:

1. Written statement of commitment to the *SFI 2021 Fiber Sourcing Standard* communicated throughout the organization, particularly to facility and woodland managers, *fiber sourcing* staff and field foresters.
2. Assignment and understanding of roles and responsibilities for achieving *SFI 2022 Fiber Sourcing Standard* objectives.
3. Staff education and training sufficient to their roles and responsibilities.
4. Contractor education and training sufficient to their roles and responsibilities.

Performance Measure 6.2. *Certified organizations* shall work individually and/or with *SFI Implementation Committees*, logging or forestry associations, or appropriate agencies or others in the *forestry* community to foster improvement in the professionalism of *wood producers* specific to *qualified logging professionals*.

Indicators:

1. Participation in or support of *SFI Implementation Committees* to establish criteria and identify delivery mechanisms for wood producer core training courses that allow individuals to attain *qualified logging professional* status. These criteria must address at least the following:
 - a. awareness of *sustainable forestry principles* and SFI's work;
 - b. *best management practices*, including streamside management and road construction, maintenance, and retirement;
 - c. awareness of responsibilities under the U.S. Endangered Species Act, the Canadian Species at Risk Act, *Forests with Exceptional Conservation Value* (*critically imperiled* and *imperiled* species and ecological communities), and other measures to *protect biodiversity* and *wildlife habitat*;



- d. logging safety;
 - e. U.S. Occupational Safety and Health Administration (OSHA) and Canadian Centre for Occupational Health and Safety (CCOHS) regulations, wage and hour rules, and other provincial, state, and local employment laws, and
 - f. other topics identified by *certified organizations* and/or *SFI Implementation Committees* that improve their responsibilities in meeting the *SFI 2022 Standards*.
2. Participation in or support of *SFI Implementation Committees* to establish criteria and identify delivery mechanisms for wood producer continuing education training courses that shall be taken by *qualified logging professionals* at least once every two years to maintain their status. The continuing education training course(s) shall address one or more of the following topics:
- a. awareness of *sustainable forestry principles* and the SFI's work;
 - b. *best management practices*, including streamside management and road construction, maintenance, and retirement;
 - c. *reforestation, invasive species management, forest resource conservation, aesthetics and special sites*;
 - d. awareness of rare forested *natural communities* as identified by provincial or state agencies, or by credible organizations such as NatureServe or The Nature Conservancy;
 - e. transportation issues;
 - f. business management;
 - g. public policy and outreach;
 - h. awareness of emerging technologies;
 - i. logging safety; or
 - j. other topics identified by the *certified organization* and/or *SFI Implementation Committees* that improve their responsibilities in meeting the SFI 2022 Standards.

Objective 7. Community Involvement and Landowner Outreach

To broaden the practice of *sustainable forestry* through public outreach, education, and involvement and to support the efforts of *SFI Implementation Committees*.

Performance Measure 7.1. *Certified organizations* shall support and promote efforts by consulting foresters, state, provincial and federal agencies, state or local groups, professional societies, *conservation organizations, Indigenous Peoples* and governments, community groups, sporting organizations, labor, universities, extension agencies, the *American Tree Farm System®* and/or other landowner cooperative *programs* to apply *principles* of sustainable forest management.

Indicators:

1. Support, including financial, for efforts of *SFI Implementation Committees*.
2. Support individually or and/or through cooperative efforts involving *SFI Implementation Committees*, education and outreach to *forest landowners* describing the importance of and providing implementation guidance on:
 - a. *best management practices*;
 - b. *reforestation and afforestation*;
 - c. *visual quality management*;
 - d. *conservation objectives*, such as of critical *wildlife habitat* elements, *biodiversity, threatened and endangered species*, and *Forests with Exceptional Conservation Value*;
 - e. management of harvest residue (e.g., slash, limbs, tops) considers economic, social, environmental factors (e.g., organic and nutrient value to future forests) and other utilization needs;
 - f. control of *invasive species*;
 - g. characteristics of *special sites*;
 - h. reduction of wildfire risk;
 - i. use of *qualified logging professionals, qualified resource professionals* and/or *certified logging companies*;
 - j. awareness of SFI, and
 - k. reporting of inconsistent practices.
3. Participation in efforts to support or promote conservation of managed forests through voluntary market-based incentive *programs* such as current-use taxation *programs, Forest Legacy Program, conservation easements*, federal, state, or provincial cost share programs, or SFI Conservation Grants.
4. *Certified organizations* are knowledgeable about credible regional conservation planning and priority-setting efforts that include a broad range of *stakeholders* and have a *program* to take into account the results of these efforts in planning.
5. *Certified organizations* with *fiber sourcing programs*, either individually or collaboratively with *SFI Implementation Committees*, encourage forest landowners to participate in forest management certification *programs*.



Performance Measure 7.2. *Certified organizations* shall individually or through cooperative efforts involving *SFI Implementation Committee(s)* support and promote, at the state, provincial or other appropriate levels, mechanisms for public outreach, education and involvement related to sustainable forest management.

Indicator:

1. Periodic educational opportunities for the public promoting *sustainable forestry*, such as
 - a. field tours, seminars, websites, webinars or workshops;
 - b. educational trips;
 - c. self-guided forest management trails;
 - d. publishing articles, educational pamphlets or newsletters; or
 - e. support for national, state, provincial, and local *forestry* organizations and soil and water *conservation* districts, and
 - f. engaging and supporting teachers and/or students through initiatives such as Project Learning Tree.

Performance Measure 7.3. *Certified organizations* shall individually and/or through cooperative efforts involving *SFI Implementation Committees* establish, at the state, provincial, or other appropriate levels, procedures to address concerns raised by loggers, consulting foresters, employees, unions, *stakeholders*, the public or other *certified organizations* regarding practices that appear inconsistent with the SFI standards principles and objectives.

Indicators:

1. Support for *SFI Implementation Committees* (e.g., toll-free numbers and other efforts) to address concerns about apparent nonconformance.
2. Process to receive and respond to public inquiries. *SFI Implementation Committees* shall submit data annually to *SFI Inc.* regarding concerns received and responses.

Objective 8. Public Land Management Responsibilities

To participate and implement sustainable forest management on *public lands*.

Performance Measure 8.1. *Certified organizations* with forest *management responsibilities on public lands* shall participate in the development of *public land* planning and management processes.

Indicators:

1. Involvement in *public land* planning and management activities with appropriate governmental entities and the public.
2. Appropriate contact with local *stakeholders* over forest management issues through state, provincial, federal, or independent collaboration.

Objective 9. Communications and Public Reporting

To increase transparency and to annually report progress on conformance with the *SFI Fiber Sourcing Standard*.

Performance Measure 9.1. A *certified organization* shall provide a summary audit report, prepared by the *certification body*, to *SFI Inc.* after the successful completion of a certification, recertification, or surveillance audit to the *SFI 2022 Fiber Sourcing Standard*.

Indicator:

1. The summary audit report submitted by the *certified organization* (one copy must be in English), shall include, at a minimum,
 - a. a description of the audit process, *objectives* and scope;
 - b. a description of substitute *indicators*, if any, used in the audit and a rationale for each;
 - c. the name of the certified organization that was audited, including its SFI representative;
 - d. a general description of the *Certified organization's* forestland, fiber procurement and/or manufacturing operations included in the audit;
 - e. a summary of the *Certified Organization's* assessment for *Forests with Exceptional Conservation Values* within its wood and *fiber supply area*;
 - f. the name of the *certification body* and *lead auditor* (names of the *audit team* members, including technical experts may be included at the discretion of the *audit team* and the *certified organization*);
 - g. the dates the audit was conducted and completed;
 - h. a summary of the findings, including general descriptions of evidence of conformity and any nonconformities and corrective action plans to address them, opportunities for improvement, and exceptional practices; and
 - i. the certification decision.

The summary audit report will be posted on the [SFI Inc. website](#) for public review.



Performance Measure 9.2. *Certified organizations* shall report annually to *SFI Inc.* on their conformance with the *SFI Fiber Sourcing Standard*.

Indicators:

1. Prompt response to the SFI annual progress report survey.
2. Record keeping for all the categories of information needed for SFI annual progress report surveys.
3. Maintenance of copies of past survey reports to document progress and improvements to demonstrate conformance to the *SFI 2022 Fiber Sourcing Standard*.

Objective 10. Management Review and Continual Improvement

To promote continual improvement in the practice of *sustainable forestry* by conducting a management review and monitoring performance.

Performance Measure 10.1. *Certified organizations* shall establish a management review system to examine findings and progress in implementing the *SFI 2022 Fiber Sourcing Standard*, to make appropriate improvements in *programs*, and to inform their employees of changes.

Indicators:

1. System to review commitments, *programs*, and procedures to evaluate effectiveness.
2. System for collecting, reviewing, and reporting information to management regarding progress in achieving *SFI 2022 Fiber Sourcing Standard* objectives and *performance measures*.
3. Annual review of progress by management and determination of changes and improvements necessary to continually improve conformance to the *SFI 2022 Fiber Sourcing Standard*.

Objective 11. Avoid Controversial Sources

To manage the risk of sourcing fiber from *controversial sources*.

Controversial sources are defined as:

- a. Forest activities which are not in compliance with applicable state, provincial, federal, or international laws.
- b. Forest activities which are contributing to regional declines in *habitat conservation* and species *protection* (including *biodiversity* and *special sites*, Alliance for Zero Extinction sites and key Biodiversity Areas, *threatened and endangered species*).
- c. *Conversion sources* originating from regions experiencing forest area decline.
- d. Forest activities where the spirit of the ILO Declaration on Fundamental Principles and Rights at work (1998) are not met.
- e. Forest activities where the spirit of the United Nations Declaration on the Rights of Indigenous Peoples (2007) are not met.
- f. *Fiber sourced from areas without effective social laws*
- g. *Illegal Logging* including trade in CITES (The Convention on International Trade in Endangered Species of Wild Fauna and Flora) listed species.
- h. Conflict Timber.
- i. Genetically modified trees via forest tree biotechnology.

Performance Measure 11.1. The *certified organization* shall have a process to access and collect information regarding the sources of its procured fiber.

Indicators:

1. The *certified organization* shall collect information on the source of the fiber, through a due diligence system to address the likelihood of sourcing from *controversial sources*. This includes:
 - a. Identification of tree species, or list of tree species potentially included, by their common name and or their scientific name where applicable.
 - b. Country and region of harvest of the fiber.
 - c. If requested by their customer, provide the information required in a. and b.
2. The *certified organization* can consider fiber low risk and exempt from due diligence when:
 - a. Procured from a supplier with a valid SFI Section 2 (*SFI Forest Management Standard*) certificate, or other *acceptable forest management standards*, that clearly indicates that the source is within the scope of the certification; or
 - b. Procured from a supplier with a valid SFI Section 3 (*SFI Fiber Sourcing Standard*) certificate that clearly indicates that the source is within the scope of the certification and/or the due diligence system; or
 - c. Procured from a supplier with a valid SFI Section 4 (*SFI Chain-of-Custody Standard*), or other *credible chain-of-custody standard* certificate and/or due diligence system; or

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- d. Procured from a supplier with a valid SFI Section 5 (*SFI Certified Sourcing Standard*) certificate that clearly indicates that the source is within the scope of the certification and/or due diligence system.

Performance Measure 11.2. The *certified organization* shall individually and/or through cooperative efforts involving *SFI Implementation Committee(s)* have a process to conduct a risk assessment.

Indicators:

1. The *certified organization* shall develop and implement a due diligence system (DDS) to manage the risk of sourcing fiber from *controversial sources* in accordance with the requirements of this standard.
2. The DDS risk assessment shall classify material into low- and high-risk categories.
3. The risk assessment shall be carried out at the regional level unless risk is consistent at the national level.
4. The *certified organization* shall review, and if necessary, revise its risk ratings on at least an annual basis.
5. The *certified organization* shall conduct a risk assessment before the first time of delivery for each new region of supply.

Performance Measure 11.3. The *certified organization* shall have a process to assess substantiated concerns.

Indicators:

1. The *certified organization* shall have a program to assess any substantiated concern. A substantiated concern is information supported by proof or evidence, indicating that fiber originates from *controversial sources*. Substantiated concerns can be concerns by third parties, as well as concerns of the *certified organization* itself.
2. The *certified organization* shall update its risk assessment to reflect substantiated concerns associated with a region of origin identified through internal data or public data.

Performance Measure 11.4. The *certified organization* shall have a process to mitigate the risk of sourcing controversial fiber from high-risk areas.

Indicators:

1. Where the risk assessment determines high risk, the *certified organization* shall implement a *program* to mitigate such risk and require a signed contract and/or self-declaration that the supplied fiber does not originate from *controversial sources*.
2. For each supply source where the risk is high, the risk assessment shall also identify the specific verifiable controls that the supplier has in place to substantially reduce the risk of sourcing fiber from *controversial sources*.
3. Where a *certified organization* receives fiber, and then learns the fiber is from *controversial sources*, if possible, the fiber shall be segregated and prevented from entering the supply chain. If fiber has already entered the supply chain and cannot be segregated additional corrective measures shall be implemented to avoid future *controversial sources*. If subsequent verification demonstrates that the risk of this fiber originating from controversial sources is low, the fiber can re-enter the supply chain.
4. The *certified organization* shall identify the verifiable measures to be implemented across the full supply chain for each source of supply identified as high risk to ensure that the supply is not from *controversial sources* which will include:
 - a. assessing the operating effectiveness of verifiable measures, through field-based verification.
 - b. for direct sources, include field and document verification of *controversial sources* risk factors back to the forest units from which fiber is sourced.
 - c. for indirect sources, include site and document verification of suppliers (such as lumber suppliers, chip suppliers and wood yards) to establish the absence of *controversial sources* risk factors in their inputs and sample-based field verification of their supply sources back to the forest units from which they source fiber.
5. Where sampling is conducted as part of the verification *program*, the sampling program should be risk based to draw valid conclusions across all fiber inputs.

Performance Measure 11.5. The *certified organization* shall have a process to avoid *controversial sources*.



Indicator:

1. Where the verifiable measures in Performance Measure 11.4 are not considered to be effective in reducing the risk of receiving fiber from *controversial sources* to low, fiber from these sources shall be avoided.

OBJECTIVE TO SUPPORT EUDR DUE DILIGENCE REQUIREMENTS

The below *Objective* is for *Operators* or *Traders* as defined by the *EUDR*, and any *Certified Organization* that is a supplier to the *operator* and *trader* and needs to demonstrate support of the due diligence requirements of the *EUDR*. The supplemental requirements below are extracted from the *EUDR* but worded and organized to help facilitate implementation in the U.S. and Canada. References to clauses in the *EUDR* are noted next to the Performance Measure and/or Indicator.

Objective 12. Avoid *EUDR* Non-Compliant Sources.

To manage the risk of sourcing fiber from *EUDR non-compliant sources*.

Performance Measure 12.1 *Certified Organizations* shall collect and retain location-specific information for all *relevant products*. (Article 9 - *EUDR*)

Indicators:

1. The *certified organization* shall leverage the information collected via effective implementation of the SFI 2022 Fiber Sourcing Standard requirements including:
 - a. Conducting a risk assessment (indicator 11.1.1), and
 - b. Information collected in achieving legal and regulatory compliance (Objective 4).
2. Information to be collected shall include:
 - a. a description, including the trade name and type of the *relevant products* as well as, in the case of *relevant products* that contain or have been made using wood, the common name of the species and their full scientific name; the product description shall include the list of *relevant commodities* or *relevant products* contained in Annex 1 of the *EUDR* or used to make those products. (an expansion of 11.1.1 a). (Article 9, 1.a. - *EUDR*)
 - b. the quantity of the *relevant products*; for *relevant products* entering or leaving the market, the quantity is to be expressed in kilograms of net mass, volume or number of items as applicable. (Article 9, 1.b. - *EUDR*)
 - c. the country of production and region of production (as per 11.1.1 c). (Article 9, 1.c. - *EUDR*)
 - d. the geolocation of all plots of land where the *relevant commodities* that the *relevant product* contains, or has been made using, were produced using at least one set of latitude and longitude coordinates using at least six decimal digits. For plots of land of more than four hectares this shall be provided using polygons with sufficient latitude and longitude points to describe the perimeter of each plot of land. (Article 9, 1.d. - *EUDR*)
 - e. the date or time range of production. (Article 9, 1.d. - *EUDR*)
 - f. the name, postal address and email address of any business or person from whom they (EU *Operator* or *Trader*) have been supplied with the *relevant products* being placed on the EU Market, as defined by *EUDR* Annex I. *Certified Organizations* do not need to obtain this information for all raw-material (commodity) suppliers of commodities. (Article 9, 1.f. - *EUDR*)
 - g. adequately conclusive and verifiable information that the *relevant products* are *deforestation-free*. (Article 9, 1.g. - *EUDR*)
 - h. adequately conclusive and verifiable information that the *relevant commodities* have been produced in accordance with the relevant legislation of the country of production, including any arrangement conferring the right to use the respective area for the purposes of the production of the *relevant commodity*. (Article 9, 1.h. - *EUDR*)
3. Information collected shall be organized and kept for five years from the date of the placing on the market or of the export from the EU of the related products. (Article 9, 1. - *EUDR*)

Performance Measure 12.2. The *Certified Organization* shall conduct a risk assessment process to evaluate the risk of *EUDR* non-compliance by *relevant products*. (Article 10 - *EUDR*)

Indicators:

1. A risk assessment shall be conducted by the *Certified Organization* for the fiber sourced for all *relevant products* to determine if the risk of *EUDR* non-compliance is more than negligible. (Article 10 - *EUDR*)
2. In instances where all *relevant products* have been sourced from countries or regions classified by the EU as low risk, the risk assessment shall incorporate at least 12.2.5. (Article 10, 2.a. & Article 29 - *EUDR*)
3. Where the countries or regions of origin of *relevant products* are not classified by the EU as low risk or do not have a specific risk designation to date, the risk assessment shall also incorporate the criteria/information described in 12.2.6. (Article 10, 2.a. & Article 29 - *EUDR*)

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4. To the extent that the *Certified Organization* is an *SME*, the risk assessment may follow the reduced risk assessment requirements laid out in 12.2.12. (*Article 18 - EUDR*)
 5. *Certified Organizations* sourcing only from countries or regions classified by the EU as low risk shall:
 - a. gather and maintain documentation demonstrating that there is a *negligible risk* of circumvention of the *EUDR* or of mixing with products of unknown origin or origin in high-risk or standard-risk countries or regions. (*Article 13, 1. – EUDR*)
 - b. Upon becoming aware of any relevant information, including as a result of the assessment carried out under this indicator, and including substantiated concerns submitted to competent EU authorities that would point to a risk that the relevant products do not comply with the *EUDR* or that the *EUDR* is circumvented, the *Certified Organization* shall complete the risk assessment under 12.2.3 and develop relevant required mitigating measures under performance measure 12.4 and shall immediately communicate any relevant information to the competent EU authority under 12.3. (*Article 13, 2. & 3. – EUDR*)
 6. *Certified Organizations* sourcing from countries or regions not classified by the EU as low risk or sourcing fiber products where there is a risk of circumvention of the *EUDR* or of mixing with products of unknown origin or origin in high-risk or standard-risk countries or regions shall base their risk assessment on the following criteria/information: (*Article 10, 1. – EUDR*)
 - a. the assignment of risk to the relevant country or region of production by the EU; (*Article 10, 2.a. – EUDR*)
 - b. the presence of forests in the country or region of production; (*Article 10, 2.b. – EUDR*)
 - c. the presence of Indigenous Peoples in the country or region of production; (*Article 10, 2.c. – EUDR*)
 - d. the consultation and cooperation in good faith with Indigenous Peoples in the country or region of production; (*Article 10, 2.d. – EUDR*)
 - e. the existence of duly reasoned claims by Indigenous Peoples based on objective and verifiable information regarding the use or ownership of the area used for the purpose of producing the *relevant commodity*; (*Article 10, 2.e. – EUDR*)
 - f. prevalence of *deforestation* or *forest degradation* in the country or region of production; (*Article 10, 2.f. – EUDR*)
 - g. the source, reliability, validity, and links to other available documentation supporting assessment of non-compliance risk; (*Article 10, 2.g. – EUDR*)
 - h. concerns in relation to the country or region of production and origin, such as level of corruption, prevalence of document and data falsification, lack of law enforcement, violations of international human rights, armed conflict or presence of sanctions imposed by the UN Security Council or the Council of the European Union; (*Article 10, 2.h. – EUDR*)
 - i. the complexity of the relevant supply chain and the stage of processing of the *relevant products*, in particular difficulties in connecting *relevant products* to the plot of land where the *relevant commodities* were produced; (*Article 10, 2.i. – EUDR*)
 - j. the risk of circumvention of the *EUDR* or of mixing with relevant products of unknown origin or produced in areas where *deforestation* or *forest degradation* has occurred or is occurring; (*Article 10, 2.j. – EUDR*)
 - k. conclusions of the meetings of the EU Commission expert groups supporting the implementation of the *EUDR*, as published in the Commission's expert group register; (*Article 10, 2.k. – EUDR*)
 - l. substantiated concerns submitted to competent EU authorities and information on the history of non-compliance of *operators* or *traders* along the relevant supply chain with the *EUDR*; (*Article 10, 2.l. – EUDR*)
 - m. any information that would point to a risk that the *relevant products* are non-compliant; (*Article 10, 2.m. – EUDR*)
 - n. complementary information on compliance with the *EUDR*, which may include information supplied by certification or other third-party verified schemes, including voluntary schemes recognized by the relevant EU Commission, provided that the information meets the requirements set out in indicator 12.1.2. (*Article 10, 2.n. – EUDR*)
 7. *Certified Organizations* shall verify and analyze the information collected above and any other relevant documentation. On the basis of that information and documentation, the *Certified Organization* shall establish whether there is a risk that the *relevant products* intended to be placed on the market or exported are noncompliant. (*Article 10, 1. – EUDR*)
 8. The risk assessment shall identify any areas where the risk is higher than negligible. (*Article 10, 1. – EUDR*)
 9. The *Certified Organization* shall document and review the risk assessments at least on an annual basis. (*Article 10, 4. – EUDR*)
 10. *Certified Organizations* shall be able to demonstrate how the information gathered was checked against the risk assessment criteria set out in 12.2.6 and how they determined the degree of risk. (*Article 10, 4. – EUDR*)
 11. In conducting risk assessments, *Operators* and/or *Traders* may refer to due diligence statements that have already been submitted to competent EU authorities and housed in the EU information system only after exercising their own due diligence over the statements to confirm that they meet *EUDR* due diligence requirements. In such cases, *Operators* and/or *Traders* shall include the reference numbers of the due diligence statements that have already been submitted in the due diligence statements that they submit. (*Article 4, 9. – EUDR*)



12. *Certified Organizations* that are *SMEs* may implement reduced risk assessment requirements:

- a. *SME operators* may refer to due diligence statements that have already been submitted to competent EU authorities without conducting further due diligence on the statements. In such cases, *Certified Organizations* that are *SMEs* shall maintain a record of the reference number of the due diligence statement. For parts of relevant products that have not been subject to due diligence, the *SME operators* shall conduct the full risk assessment and mitigation process required of non-SMEs. (Article 4, 8. – EUDR)
- b. *SME traders* shall make available relevant products on the market only if they are in possession of the following information relating to the relevant products they intend to make available on the market: (Article 5, 2. and 3. – EUDR)
 - i. the name, registered trade name or registered trademark, the postal address, the email address and, if available, a web address of the operators or the traders who have supplied the *relevant products* to them, as well as the reference numbers of the due diligence statements associated to those products;
 - ii. the name, registered trade name or registered trademark, the postal address, the email address and, if available, a web address of the operators or the *traders* to whom they have supplied the *relevant products*.

Performance Measure 12.3 The *Certified Organization* shall communicate substantiated concerns.

Indicator:

1. *Certified Organizations* that obtain or are made aware of relevant new information, including substantiated concerns, indicating that a *relevant product* that they have placed on the market is at risk of not complying with the *EUDR* shall immediately inform the competent EU authorities of the Member States in which they placed the relevant product on the market, as well as *traders* to whom they supplied the *relevant product*. In the case of exports from the EU, the *operators* shall inform the competent authority of the Member State which is the country of production. (Article 4, 5. – EUDR)

Performance Measure 12.4 The *Certified Organization* shall have a process to mitigate the risk that *relevant products* are non-compliant with the *EUDR*.

Indicators:

1. Where a risk assessment is required and the risk assessment determines risk that is higher than negligible, the *Certified Organization* shall implement a program to mitigate the risk by adopting risk mitigation procedures and measures that are sufficient to achieve no or *negligible risk*. (Article 11, 1. – EUDR)
2. Procedures and measures required to mitigate higher than *negligible risk* may include any of the following (Article 11, 1. – EUDR):
 - a. requiring additional information, data or documents
 - b. carrying out independent surveys or audits;
 - c. taking other measures pertaining to information requirements set out in indicator 12.1.2. Such procedures and measures may also include supporting compliance with the *EUDR* by the *Certified Organizations* suppliers, in particular smallholders, through capacity building and investments.
3. *Certified Organizations* shall have in place adequate and proportionate policies, controls, and procedures to mitigate and effectively manage the risks of non-compliance of fiber products. Those policies, controls and procedures shall include (Article 11, 2. – EUDR):
 - a. model risk management practices, reporting, record-keeping, internal control and compliance management, including the appointment of a compliance officer at management level for non-SME *Certified Organizations*;
 - b. an independent audit function to check the internal policies, controls and procedures referred to in point (a) for all non-SME *Certified Organizations*.
4. The decisions on risk mitigation procedures and measures shall be documented and reviewed at least on an annual basis. (Article 11, 3. – EUDR)
5. *Certified Organizations* shall be able to demonstrate how decisions on risk mitigation procedures and measures were taken. (Article 11, 3. – EUDR)

Performance Measure 12.5 The *Certified Organization* shall maintain its due diligence system to avoid *EUDR non-compliance*.

Indicators:

1. Where the risk mitigation developed under Performance Measure 12.4 are not considered to be effective in reducing the risk of relevant products being *EUDR non-compliant* sources to negligible, fiber from these sources shall not be placed on the market. (Article 4, 4. – EUDR)

2. In the event that non-compliance with the *EUDR* is identified by the *Certified Organization* and/or the relevant competent authority(ies), a relevant product placed or made available on the market or exported is identified as non-compliant, the *Certified Organization* shall without delay implement appropriate and proportionate corrective action, which shall include at least one of the following in order to bring the non-compliance to an end within a specified and reasonable period of time (aligned with indicator 11.4.3) (*Article 24, 1. and 2. – EUDR*):
 - a. rectifying any formal non-compliance issued by the competent authority(ies);
 - b. preventing the *relevant product* from being placed or made available on the market or exported;
 - c. withdrawing or recalling the *relevant product* immediately;
 - d. donating the *relevant product* or *relevant commodity* to charitable or public interest purposes or, if that is not possible, disposing of it in accordance with Union law on waste management.’
3. Irrespective of the corrective action taken under Indicator 12.5.2. the *Certified Organization* shall address any shortcomings in its due diligence system with a view to preventing the risk of further non-compliance with the *EUDR*. (*Article 24, 3. – EUDR*)
4. *Certified Organizations* shall review the due diligence system at least once a year. Where *Certified Organizations* become aware of new developments which could influence the due diligence system, they shall update the due diligence system to take account of those developments. (*Article 12, 2. – EUDR*)
5. *Certified Organizations* shall keep for at least five years all documentation related to due diligence, such as all records, measures and procedures implemented, and updates made to the due diligence system over time. (*Article 12, 2. and 5. – EUDR*)

Performance Measure 12.6. The *Certified Organization* shall have a process to communicate information on its fiber sourcing due diligence processes.

Indicators:

1. *Certified Organizations* shall communicate to operators and to traders further down the supply chain of the *relevant products* they placed on the market or exported from the EU all information necessary to demonstrate that due diligence was exercised and that no or only a *negligible risk* was found. (*Article 4, 7. – EUDR*)
2. *Operators* who do not fall within the categories of *SMEs* shall, on an annual basis, publicly report as widely as possible, including via the internet, on their due diligence system, including on the steps taken by them to fulfil their obligations to maintain a due diligence system incorporating information collection, risk assessment and mitigating measures. (*Article 12, 3. – EUDR*)
3. The *Operator’s* public report shall include the following information concerning *relevant commodities* and *relevant products*:
 - a. a summary of the information relating to: (*Article 12, 4. – EUDR*)
 - i. a description, including the trade name and type of the *relevant products* as well as, in the case of *relevant products* that contain or have been made using wood, the common name of the species and their full scientific name; the product description shall include the list of *relevant commodities* or relevant products contained in Annex 1 of the *EUDR* or used to make those products.
 - ii. the quantity of the *relevant products*; for *relevant products* entering or leaving the market, the quantity is to be expressed in kilograms of net mass, volume or number of items as applicable.
 - iii. the country of production and region of production
 - b. the conclusions of the risk assessment carried out and mitigation measures undertaken and a description of the information and evidence obtained and used to assess the risk; (*Article 12, 4. – EUDR*)
 - c. where applicable, a description of the process of consultation of Indigenous Peoples, local communities and other customary tenure rights holders or of the civil society organizations that are present in the area of production of the relevant commodities and relevant products. (*Article 12, 4. – EUDR*)
4. The *Operator* shall supply a due diligence statement in accordance with Article 4(2) in the *EUDR*. (*Annex II – EUDR*)
 - a. *Operator’s* name, address and, in the event of *relevant commodities* and *relevant products* entering or leaving the market, the Economic Operators Registration and Identification (EORI) number in accordance with Article 9 of Regulation (EU) No 952/2013.
 - b. Harmonised System code, free-text description, including the trade name as well as, where applicable, the full scientific name, and quantity of the *relevant product* that the *operator* intends to place on the market or export. For *relevant products* entering or leaving the market, the quantity is to be expressed in kilograms of net mass and, where applicable, in the supplementary unit set out in Annex I to Regulation (EEC) No 2658/87 against the indicated Harmonised System code or, in all other cases, expressed in net mass specifying a percentage estimate or deviation or, where applicable, volume or number of items. A supplementary unit is applicable where it is defined consistently for all possible subheadings under the Harmonised System code referred to in the due diligence statement.
 - c. Country of production and the *geolocation* of all plots of land where the *relevant commodities* were produced. For *relevant products* that contain or have been made using cattle, and for such *relevant products* that have been fed with *relevant products*, the *geolocation* shall refer



to all the establishments where the cattle were kept. Where the *relevant product* contains or has been made using commodities produced in different plots of land, the *geolocation* of all plots of land shall be included in accordance with Article 9(1), point (d).

- d. For *operators* referring to an existing due diligence statement pursuant to Article 4(8) and (9), the reference number of such due diligence statement.
- e. The text: 'By submitting this due diligence statement the operator confirms that due diligence in accordance with Regulation (EU) 2023/1115 was carried out and that no or only a *negligible risk* was found that the *relevant products* do not comply with Article 3, point (a) or (b), of that Regulation.'
- f. Signature in the following format:
 - Signed for and on behalf of:
 - Date:
 - Name and function: Signature: