

Appendix 1 - Summary of Edits from PEFC Endorsement Process

During the PEFC assessment, SFI had to clarify intent or add language for some SFI Sections to ensure conformity with PEFC requirements. These edits do not change the intent of what was discussed during the Standards revision process, nor do they impact the Forest Management, Fiber Sourcing or Chain of Custody Standards. However, because they are edits to the documents, we will need official approval of these edits by the Board of Directors. Below is a summary of the edits and rationale for the change. Edits appear in the text boxes.

The Sections edited include:

- SFI Section 4 – SFI 2022 Chain of Custody Standard
- SFI Section 7 – Guidance the 2022 SFI Standards and Rules
- Section 9 – Standards Development and Interpretations Process
- Section 10 - SFI 2022 Audit Procedures and Auditor Qualifications and Accreditation
- Section 13 – Optional Modules
- Section 14 – SFI Definitions

Section 4 – 2022 Chain of Custody Standard

1. 1.2 – Additional Requirements – This part of the Standard was edited to clarify that a primary or secondary producer can make a X% PEFC Certified claim using their SFI Chain of Custody certification.

1.2 Additional Requirements

Primary producers must also conform to the SFI 2022 Fiber Sourcing Standard.

Primary and secondary producers with a valid SFI 2022 Chain-of-Custody certificate can use their Chain-of-Custody procedures to make SFI-certified sourcing claims or apply the SFI-certified sourcing label provided they satisfy the requirements of Part 3: Calculating the Certified Sourcing Claim in the SFI 2022 Certified Sourcing 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.

Primary and secondary producers with a valid SFI 2022 Chain of Custody certificate can use their Chain-of-Custody procedures to make PEFC chain of custody claims or apply the PEFC on-product logo provided they comply with the applicable requirements in PEFC ST 2002:2020 – Chain of Custody of Forest and Tree Based Products - Requirements and PEFC ST 2001:2020 - PEFC Trademark Rules.

2. 1.3 References – This part of the Standard was edited to add two PEFC documents (PEFC 2001:2020 Trademark Rules and PEFC ST 2002: 2020 PEFC Chain of Custody Standard) as Informative References to align with the edit in 1.2 - Additional Requirements.

1.3 References

Informative References

- i. ISO 9000:2005 Quality management systems — Fundamentals and vocabulary
- ii. ISO 9001:2015 Quality management systems — Requirements
- iii. ISO 14001:2015 Environmental Management Systems — Specification with guidance for use
- iv. PEFC ST 2002:2020 Chain-of-Custody of Forest-Based Products — Requirements, February 2020
- v. [PEFC ST 2001:2020 - PEFC Trademark Rules, February 2020](#)
- vi. [PEFC ST 2002:2020 – Chain of Custody of Forest and Tree Based Products – Requirements](#)

3. 4.1 Identification at the Delivery Level – This part of the Standard was edited to add certificates for the SFI Fiber Sourcing Standard, the PEFC Chain of Custody Standard and *other acceptable forest management standards* as evidence of the source material. The footnote (1) was added for alignment with Part 1.2 Additional Requirements.

4.1 Identification at the Delivery Level

The *SFI-certified organization* shall identify and verify the category of the *origin* of all procured raw material. Documents and/or verifiable information associated with the source and/or delivery of raw material shall include at least:

- a. supplier identification,
- b. quantity of delivery,
- c. date of delivery / delivery period / accounting period,
- d. category of *origin*¹,
 - i. *SFI X% Certified Forest Content*
 - ii. *SFI X% SFI Recycled Content*
 - iii. *SFI X% Pre-Consumer Recycled*
 - iv. *SFI X% Post-Consumer Recycled*
 - v. *SFI X% Certified Sourcing or SFI Certified Sourcing*
 - vi. *SFI Credit or 100% as calculated under the credit method.*
 - vii. *SFI at Least X% Certified Forest Content*
 - viii. *SFI 100% from a Certified Forest*
 - ix. *SFI 100% Certified Forest Content* - Raw material from a forest certified to an *acceptable forest management standard* constitutes a claim of 100% *certified forest content*
- e. The supplier's *SFI 2022 Forest Management Standard, SFI 2022 Chain-of-Custody Standard, [SFI 2022 Fiber Sourcing Standard, PEFC Chain-of-Custody Standard, other acceptable forest management standards](#)*, certificate number, as applicable.

¹[Primary and secondary producers with a valid SFI 2022 Chain of Custody certificate can use their Chain-of Custody procedures to make PEFC chain of custody claims or apply the PEFC on-product logo provided they comply with the applicable requirements in PEFC ST 2002:2020 - Chain of Custody of Forest and Tree Based Products – Requirements and PEFC ST 2001:2020 - PEFC Trademark Rules. A matrix on SFI and PEFC category of origin alignments is available in the Guide to the SFI Standards and Rules \(Section 7\).](#)

4. 5.2. d. Footnote (2) was added to align with 1.2 – Additional Requirements

² Primary and secondary producers with a valid SFI 2022 Chain of Custody certificate can use their Chain-of-Custody procedures to make PEFC chain of custody claims or apply the PEFC on-product logo provided they comply with the applicable requirements in PEFC ST 2002:2020 - Chain of Custody of Forest and Tree Based Products – Requirements and PEFC ST 2001:2020 - PEFC Trademark Rules. A matrix on SFI and PEFC category of origin alignments is available in the Guide to the SFI Standards and Rules (Section 7).

5. Clause 7.2.1 c. was added to the requirement to state that if requested by their customer, the certified organization shall provide the species and country of harvest.

7.2.1 The *SFI-certified organization* shall collect information on the source of the forest-based product, through a due diligence system to address the likelihood of sourcing from controversial sources.

~~b-c.~~ If requested by their customer, provide the information required in a. and b.

6. Clause 8.4.1 g was added to clarify that the certified organization is required to keep records of complaints.

8.4.1 The *SFI-certified organization* shall establish and maintain records to provide evidence it has conformed to the requirements of this standard and its Chain-of-Custody procedures are effective and efficient. The organization shall keep at least the following:

g. records of all complaints received from suppliers, customers, and other parties relating to its Chain-of-Custody system.

7. Clause 8.7 was edited to state that the certified organization shall provide a summary of complaints received if requested by SFI.

8.7 In accordance with clause 8.4.1 g and SFI Section 12, the *SFI-certified organization* shall establish procedures for dealing with complaints from suppliers, customers, and other parties relating to its Chain-of-Custody system. If requested by SFI, provide SFI a summary of complaints received.

Section 7 – Guidance to the 2022 SFI Standards and Rules

1. Conversion of One Forest Cover Type to Another Forest Cover Type - Guidance was added to i. recognize the scale and scope of small landowners/managers certified to the SFI Small Lands Group Certification Module or the Small-Scale Forest Management Module for Indigenous Peoples and Families (the Modules), and ii. clarify how conversion to another forest cover type protects Forests with Exceptional Conservation Value.

SFI Small Lands Group Certification Module and SFI Small Scale Forest Management Module of Indigenous Peoples and Families (the Modules) and Conversion to Other Forest Cover Types

Regarding reforestation by organizations certified to the Modules, it is recognized that that in most instances the landowner/manager is going to reforest with species that were present on the site prior to harvest. Nonetheless, the landowner/manager may decide to reforest to another appropriate native forest cover type. This is an acceptable land management decision given that the reforested species is ecologically appropriate and meets the intent of protecting Forests of Exceptional Conservation Values or Forests of Recognized Importance for members of a Small Lands Group Certification Module certificate in the United States.

2. Conversion of Forest Land to Another Land Use - Guidance was added to clarify that small forest landowners/managers certified to the SFI Modules must be aware of the risks of conversion to non-forest land use.

The intent of Performance Measure 1.3 to ensure that forest land that is being converted to non-forest land uses is appropriately scoped out of SFI certificates. The SFI Small Lands Group Certification Module, clause 4.1.2 and the SFI Small Scale Forest Management Module for Indigenous Peoples and Families, Objective 1 require the landowner to identify risks of conversion of forests to non-forest uses and measures to mitigate this risk. Two basic tenets establish the rationale for these requirements this Performance Measure. First, forest land that is being converted to non-forest land uses would not likely meet any of the *SFI 2022 Forest Management Standard and Module* requirements (prompt reforestation, biodiversity, etc.) and therefore could not be certified under the *SFI 2022 Forest Management Standard or the Modules.*

3. Prohibited Chemicals: SFI 2022 Forest Management Standard and SFI Small Lands Group Certification Module - Guidance was added to address the use of chemicals by landowners certified to the Small Lands Group Certification Module. Use of forest chemicals by landowners certified under the Small Lands Group Certification Module must align with the applicable requirements in the SFI Forest Management Standard.

Small Lands Group Certification Module

The Module at 4.3.4.1 directs the landowner to evaluate alternatives to chemicals for the control of pests, pathogens and unwanted vegetation. Requirement 4.3.4.2 states that if used, chemicals shall be approved by the Environmental Protection Agency (EPA) in the United States or the Pest Management Regulatory Agency (PMRA) of Health Canada. They shall be applied, stored, and disposed of in accordance with EPA or PMRA approved labels and applied by persons who are trained, licensed (as required by their jurisdiction) and appropriately supervised. The landowner is responsible for ensuring that the planned use of a chemical is in compliance with the EPA / PMRA label requirements. Use of chemicals should be documented by the landowner or designated representative.

In the exceptional case where a landowner believes that a variance for the use of a WHO 1A and 1B chemical is required they should work with their group manager and submit the required rationale to the certification body as per the process above.

4. Legal and Regulatory Compliance (and Objective 4 of SFI Fiber Sourcing Standard SFI Small Lands Group Certification Modules and SFI Small Scale Forest Management Module for Indigenous Peoples and Families) – New guidance was added to clarify the breadth of the scope of the requirement for compliance with ‘applicable federal, provincial, state, and local forestry and related environmental laws, statutes, and regulations’ for the SFI Forest Management Standard, the SFI Fiber Sourcing Standard and the two SFI Modules. Guidance was also added to clarify that not all higher-level legislation/regulation may apply to small forest landowners/managers given the scale of their forest management operations.

Legal compliance is one of the SFI Forestry Principles. Specifically, *Certified Organizations* are required to comply with applicable federal, provincial, state, and local forestry and related environmental laws, statutes, and regulations. In support of this principle the *SFI 2022 Forest Management Standard* and the *SFI 2022 Fiber Sourcing Standard* have as Objectives, Legal and Regulatory Compliance. Likewise, the SFI Modules have requirements for legal and regulatory compliance. *Certified organizations* are assisted with implementing the requirements of these objectives by the very robust and comprehensive legal systems in the US and Canada.

The national legal systems have legislation and regulation at the federal, state / provincial, and the county or municipal level. *SFI certified organizations* depending on the jurisdictions in which they operate are required to be aware of and comply with applicable legislation as it applies to their forestry operations. This basic threshold level of legal compliance includes payment of applicable harvest royalties and/or severance taxes, control of inorganic waste, and control of fuels and lubricants. It also includes respect for property rights (trespass), and compliance with legislation prohibiting corrupt practices.

Additional requirements in the *SFI 2022 Forest Management Standard* address responsible use of forest chemicals (including fertilizers), protection of water quality, protection of biological diversity and respect for the rights of *Indigenous Peoples*. Objective 11 (and Objective 4) also require compliance with applicable social laws. Social laws are legislation 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.

Scale of Ownership and Operation and Legal Compliance

SFI certified organizations must demonstrate legal compliance with all applicable federal, provincial/state, and local forestry and related environmental legislation and regulations. This includes entities certified to the *SFI Small Lands Group Certification Module* and the *SFI Small Scale Forest Management Module for Indigenous Peoples and Families* (the Modules). Nonetheless, it is recognized that applicability of some pieces of higher-level legislation or regulation should be considered in the context of the reduced scale and scope of the forestry management operations of small forest landowners or managers of small public forests. Members of a *SFI Small Lands Group Certification Module* certificate or forest landowners or managers certified to the *SFI Small Scale Forest Management Module for Indigenous Peoples and Families* operate with significantly fewer resources, limited budgets, on forests that are very small in size. Furthermore, it is common for small forest landowners to perform much of the forest management operations themselves. *Organizations* certified to the Module(s) must use their knowledge of potentially applicable legislation for the jurisdictions where they operate to assess which are applicable given the scale and scope of their forest management operations.

Examples of categories of legislation or regulations that could be applicable for *organizations* certified the Module(s) are payment of harvesting royalties/severance taxes, worker health and safety regulations (if the landowner is using the services of contractors), control of inorganic waste, and control of fuels and lubricants, respect for property rights (trespass), and *Indigenous Peoples'* rights.

Organizations certified to the Module(s) should be able to demonstrate to their *Certification Body* what is not applicable and why. Examples of higher-level legislation which may be demonstrated to be non-applicable for small forest landowners or are addressed in other pieces of state/provincial legislation, are specific requirements for anti-corruption, protection of human rights, equal opportunities, non-discrimination, non-harassment, gender equality, and ILO Core Conventions.

5. SFI 2022 Chain-of-Custody Standard: Transition to Credit Methodology and Claim Terminology and PEFC Label Use with SFI Material Category Inputs - New guidance was added to show how: i. an SFI chain of custody certificate holder could make PEFC claims using SFI inputs, and ii. how to calculate recycled content and the corresponding claims using the percentage and credit methods. This will improve user comprehension when making PEFC or SFI claims and/or applying the SFI labels.

SFI and PEFC Claim Alignment

Primary and secondary producers with a valid *SFI 2022 Chain of Custody* certificate can use their SFI chain-of-custody procedures to make PEFC chain of custody claims or apply the PEFC on-product logo provided they comply with the applicable requirements in PEFC ST 2002:2020 - Chain of Custody of Forest and Tree Based Products – Requirements and PEFC ST 2001:2020 - PEFC Trademark Rules. All PEFC trademark use is governed by the PEFC Trademark Standard (PEFC Trademark Rules, PEFC ST 2001:2020). All PEFC Trademark use and logo generator access follows relevant PEFC National Governing Body procedures by country/region.

<u>SFI CLAIMS</u>	<u>PEFC CLAIMS</u>	<u>PEFC LABEL USE</u>
<u>SFI X% Certified Forest Content</u>	<u>X% PEFC Certified</u>	<u>Yes</u>
<u>SFI Credit or 100% as calculated under the credit method</u>		
<u>SFI at Least X% Certified Forest Content</u>		
<u>SFI 100% Certified Forest Content-Raw material from a forest certified to an acceptable forest management standard constitutes a claim of 100% certified forest content</u>		
<u>SFI X% SFI Recycled Content</u>		
<u>SFI X% Pre-Consumer Recycled</u>		
<u>SFI X% Post-Consumer Recycled</u>		
<u>SFI 100% from a Certified Forest</u>	<u>100% PEFC Origin</u>	<u>Yes</u>
<u>SFI X% Certified Sourcing or SFI Certified Sourcing</u>	<u>PEFC Controlled Sources</u>	<u>No</u>

Guidance on *SFI 2022 Chain of Custody*, Part 3.3 Calculation of the Certified Percentage

The following guidance supports SFI Chain of Custody Standard Requirement *3.3 Calculation of the Certified Percentage*; *3.3.1 The SFI-certified organization shall calculate the certification percentage separately for each claim period according to the following formula.*

<u>Mixed inputs: Percentage Method</u> $Pc = Vc / (Vc + Vo) \times 100$	<u>Pc</u> <i>Certification percentage</i> <u>Vc</u> <i>Certified content</i> <u>Vo</u> <i>Other raw material</i> <u>Vn</u> <i>Neutral material¹</i>
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A organization may use the calculation of the certified percentage to determine percentage output claims for recycled and certified forest content portions. Otherwise said, the formula is applied to each content claim separately to calculate the Pc (certification percentage).

<u>Official SFI Claims Using Percentage Method</u>	<u>Application of the calculation formula²</u>		
	<u>Vc</u>	<u>Vn</u>	<u>Vo</u>
<u>SFI X% Certified Forest Content</u> <u>SFI at Least X% Certified Forest Content</u> <i>(note: to be used when organization does not make claims on recycled)</i>	<u>Certified Forest Content</u>	<u>Recycled (both pre- and post-consumer)</u> <u>Non-forest material</u>	<u>Other than Vc and Vn</u>
<u>SFI X% Certified Forest Content</u> <u>SFI at Least X% Certified Forest Content</u> <i>(note: to be used when organization makes claims on recycled)</i>	<u>Certified Forest Content</u>	<u>Non-forest material</u>	<u>Other than Vc and Vn</u>
<u>SFI X% Recycled Content</u>	<u>Recycled content</u>		<u>Other than Vc and Vn</u>
<u>SFI X% Pre-Consumer Recycled¹</u>	<u>Pre-consumer recycled content</u>		<u>Other than Vc</u>
<u>SFI X% Post-Consumer Recycled</u>	<u>Post-consumer recycled content</u>		<u>Other than Vc</u>
<u>SFI X% Certified Sourcing</u>	<u>SFI certified sourcing</u>		<u>Other than Vc</u>
<u>PEFC Claims Using Percentage Method</u>			
<u>X% PEFC Certified</u>	<u>100% PEFC Certified</u>	<u>Recycled (both pre- and post-consumer)</u>	<u>Other than Vc</u>

Calculation Example A: Without Neutral Materials *SFI-certified organization* has 30 tons of raw material. 5 tons qualify for recycled content (following post and pre recycled definitions in Section 14 of the SFI 2022 Standards), 10 tons are SFI *Certified Forest Content* and the remaining 15 tons qualify as SFI *Certified Sourcing* content.

¹ Neutral sources: Raw material that is not counted towards or against the calculation of the certified content percentages in chain-of-custody tracking or certified sourcing tracking in SFI Sections 3 and 4. Below are the acceptable neutral sources.

- Agricultural products (e.g., cotton or other non-wood fibers and biomass from wood fiber legally classified as agricultural by state, provincial or local government) and agricultural residues.
- Post-consumer recycled content and pre-consumer recycled content may be tracked as a neutral source when not making post-consumer or pre-consumer claims about the product.

² The calculation formula used in the SFI COC Standard is consistent with international standard recycled content calculations where the recycled content is calculated from the total mass of the product (input material).

<u>SFI CERTIFIED FOREST CONTENT RAW MATERIAL</u> <u>SFI Certified Forest Content % = 10 tonnes/(10 tonnes + 20 tonnes) x 100</u>	<u>33% Certified Forest Content</u>
<u>RECYCLED CONTENT RAW MATERIAL</u> ⁵ <u>Recycled Content% = 5 tonnes/(5 tonnes + 25 tonnes) x 100</u>	<u>17% Recycled Content</u>
<u>SFI CERTIFIED SOURCING</u> <u>SFI Certified Sourcing % = 15 tonnes/(15 tonnes + 15 tonnes) x 100</u>	<u>50% Certified Sourcing</u>

Calculation Example B: With Neutral Materials *SFI-certified organization* has 30 tons of raw material. 5 tons qualify for certified sourcing content, 10 tons are SFI *Certified Forest Content* and the remaining 15 tons are neutral sources⁶.

<u>SFI CERTIFIED FOREST CONTENT RAW MATERIAL</u> <u>SFI Certified Forest Content % = 10 tonnes/(10 tonnes + 5 tonnes) x 100</u>	<u>67% Certified Forest Content</u>
<u>SFI CERTIFIED SOURCING CONTENT RAW MATERIAL</u> <u>Recycled Content% = 5 tonnes/(5 tonnes + 10 tonnes) x 100</u>	<u>33% Certified Sourcing</u>
<u>NEUTRAL SOURCES</u> <u>Neutral sources 15 tonnes are not counted towards or against the calculation of the certified content percentages</u>	<u>n/a</u>

⁴ Note: When making claims about pre- and post-consumer recycled content, both can count as certified content and the amount must be disclosed to the customer. For organizations choosing not to count pre- and post-consumer recycled content, the pre- and post-consumer recycled content is neutral and shall not be included in the calculation of the certified content percentages in Chain-of-Custody tracking.

⁵ Recycled content includes both Pre-consumer recycled content and post-consumer recycled content. SFI-certified organization may use this formula specific to pre- or post-consumer recycled content for specific pre- and/or post-consumer recycled content claims.

⁶ Neutral sources: Raw material that is not counted towards or against the calculation of the certified content percentages in chain-of-custody tracking or certified sourcing tracking in SFI Sections 3 and 4. Below are the acceptable neutral sources.

- Agricultural products (e.g., cotton or other non-wood fibers and biomass from wood fiber legally classified as agricultural by state, provincial or local government) and agricultural residues.
- Post-consumer recycled content and pre-consumer recycled content may be tracked as a neutral source when not making post-consumer or pre-consumer claims about the product.

Section 9 – Standards Development and Interpretations Process

- 1.4 Procedures – This part was edited to update the standards development procedures to better reflect the processes SFI used for the SFI 2022 Standards Development.

1.4 Procedures

... The Sustainable Forestry Initiative Standards setting process shall be on a five-year cycle, which is consistent with international protocols for forest certification standard revision cycles. The SFI Standards development process is open, transparent and consensus based and SFI Inc. Board decisions regarding final changes to the SFI standards shall be consistent with PEFC ST 1001: 2017 for consensus-based decision making. The SFI Standards setting review process shall begin with a public notice to all stakeholders prior to the start of the process. This announcement will include the end date of the review process and the effective date for the new standards. The start of the review process will be within five years of the SFI Board approval date of the current SFI Standards and Rules (April 15, 2021) and will be communicated on the SFI website, in newsletters and emails to all stakeholders. ~~inviting comments.~~ SFI shall identify stakeholders relevant to the objectives and scope of the standard-setting work. Stakeholders will be requested to nominate their representative(s) or themselves to Task Groups and the request to disadvantaged stakeholders and key stakeholders shall be made in a manner that ensures that the information reaches intended recipients and in a format that is easy to understand.

... At the start of a review, SFI Inc. will evaluate the standard against appropriate PEFC International standards, national laws and regulations and other relevant standards to identify potential gaps in the standard. SFI Inc. will consider the latest scientific knowledge, research and relevant emerging issues. For the development of a new Standard SFI will development a standard proposal document that includes:

- i. the scope of the standard,
- ii. justification of the need for the standard,
- iii. description of the intended outcomes,
- iv. assessment of potential negative impacts arising from implementing the standard, such as:
 - a. factors that could negatively affect the achievement of the outcomes,
 - b. unintended consequences of implementation,
 - c. actions to address the identified risks, and
 - d. description of the stages of standard development and their expected timetable.

For a revision of a standard, SFI will develop a proposal that includes the scope of the standard and a description of the stages of the standards revision process.

... SFI Inc. will initiate ~~the a~~-periodic standards review process ~~five years from the date of the current standards approval~~ regardless of the information gathered from the gap analysis.

~~...SFI Inc. will review the standard-setting process based on feedback received in response to the public announcement.~~

... The process shall include an initial 30-day public comment period (the enquiry draft), a second 60-day public comment period (the working draft). The announcement of the 60-day comment period shall include the start and the end date, shall be posted to the SFI website before the start date, and shall be communicated by e-mail to SFI stakeholders identified by the SFI. and Aa final draft shall be sent to the SFI Board review period (the final draft) of at least 45 days in advance of their meeting as per SFI Inc. by-laws. for the SFI Inc. Board

... Broad public and *stakeholder* involvement is important to SFI. The *SFI standards* review process shall be conducted on a national level in Canada and in the United States. *Stakeholders*, including disadvantaged and key *stakeholders* and those from the environmental community, forest products industry, private forest landowners, customers, local and federal government agencies, Indigenous organizations, trade associations, landowner associations, academia and all

other *stakeholders* shall be invited to participate in the review process. The announcement of the start of the standards revision process and all subsequent public review periods shall be communicated publicly to all interested *stakeholders* with an invitation to provide comments on the standards and standard setting process. *SFI Inc. will review the standards and standard-setting process based on feedback received during the public comment periods.*

... Upon completion of the SFI Board 45-day advance review period the SFI standards shall be finalized and approved by the SFI Board and published to the SFI website. When approved standards are launched, they shall be posted to the SFI website with the effective date, a contact name and the address for SFI Inc. as the standard setting organization. The date of the start of the next periodic review of the standard will be posted to the SFI website. All Certified Organizations have one year to fully implement new and revised SFI standards elements adopted by the SFI Board of Directors. For PEFC endorsed standards, Certified Organizations shall have one year from the date of the SFI standard's launch to fully implement the new and revised SFI requirements.

Section 10 - SFI 2022 Audit Procedures and Auditor Qualifications and Accreditation

1. 5.4.3 Determination of Conformance – The requirement was edited to clarify that a major noncompliance identified during a surveillance audit must be closed within 90 days.

... If a *major nonconformity* is found, a certificate of conformance shall not be issued until the *certification body* verifies that corrective action approved by the *lead auditor* has been implemented. For major nonconformities identified at surveillance, the certification body must verify implementation of the corrective action(s) within 90 days. A revisit may be required to verify implementation of corrective actions.

2. 5.5 SFI Technical Report to the Certified Organization – Subparagraph d. and e. edited to clarify that these requirements are specific to reports for the SFI Forest Management Standard. Sub-paragraph f. was added to include a description of the SFI-certified organization's chain of custody program.

5.5 SFI Technical Report to the Certified Organization

ISO/IEC 17021-1 at clause 9.4.8 addresses audit report contents. In addition, the SFI audit report to the *Certified Organization* shall cover:

- a. the audit plan;
- b. a description of the audit process used;
- c. the number of *auditor* days used to conduct the audit, including both on-site and off-site audit activities;
- d. information regarding any meetings or correspondence between the *audit team* and government agencies, community groups, affected *Indigenous Peoples* and *conservation* organizations (*SFI 2022 Forest Management Standard*);
- e. documentation of the rationale for the substitution or modification of any *indicators* (*SFI 2022 Forest Management Standard*);
- f. description of the *Certification Organization's* chain of custody program (*SFI 2022 Chain of Custody Standard*);
- gf. a schedule for surveillance and recertification;
- hg. any specific focus areas for the next audit visit.

3. 6.1 Competence and Evaluation of Certification Bodies - Clarifying text was added to include audits of the *Small Lands Group Certification Module* and the *SFI Small Scale Forest Management for Indigenous Peoples and Families Module*. This ensures that the audit qualifications for audit teams auditing certified organizations for the SFI Modules align with those for Forest Management and Fiber Sourcing Standards.

For audits of SFI 2022 Sections 2 and 3 and audits of the *SFI Small Lands Group Certification Module* or the *SFI Small Scale Forest Management Module for Indigenous Peoples and Families*, the certification body shall select audit team members appropriate to the scope, scale and geography of the operation being audited. Additionally, at least one member of the audit team shall have knowledge of forestry operations in the region undergoing the audit, at least one member shall have knowledge of applicable laws and regulations, at least one member shall have knowledge of the socio-demographics and cultural issues in the region, and at least one member shall be a professional forester as defined by the Society of American Foresters (SAF), the Canadian Institute of Forestry (CIF-IFC), or licensed or registered by the state(s) or province(s) in which the certification is conducted where applicable. For forest management audits, the audit team shall have expertise that includes plant and wildlife ecology, silviculture, forest modeling, forest operations, occupational safety and health, international labor standards, and hydrology. One specialist per discipline is not required to meet any of the above requirements. It is possible to have all the necessary competencies in a single auditor.

4. Appendix 2 - 3.3.1 Functions and responsibilities of the Group Manager – This clause was edited to add the identification of affected stakeholders to the responsibilities of the group manager aligning with PEFC requirements for group certification.

3.3.1 Functions and responsibilities of the Group Manager

The following functions and responsibilities of the group manager shall be specified:

f.iii.iv. identification of affected stakeholders (for forest management group certification organizations),

f.iv.v. the implementation of an internal monitoring program, its review and any preventive and/or corrective actions taken;

5. Appendix 2: Group Certification Organizations 4.2 Internal Audits - Clause 4.2.5 was added to state that at least 25% of the audit sample must be selected at random aligning with PEFC requirements.

4.2.5 At least 25% of the audit sample should be selected at random with the remaining sites selected on the basis of a risk assessment.

Section 13 – Optional Modules

1. Small Scale Forest Management Module for Indigenous Peoples and Families – Following a review that considered the perspective of potential Indigenous users, the April 15 version of Module was restructured for readability and ease of use. While the Module was restructured the requirements remain unchanged. The SFI Forest Management Principles are now referenced in Part 1 of the Module. All applicable definitions are now in an Appendix 1, and a Forest Management Plan template is now in Appendix 2. Finally, the *group certification organization* requirements are in Appendix 3. The revised Module can be accessed [here](#).

Section 14 – SFI Definitions

1. The definition of *acceptable forest management standards* revised to include the two Modules and definition of the SFI Small Lands Group Certification Module added.

acceptable forest management standards: These standards are all endorsed in the United States and Canada by the Program for the Endorsement of Forest Certification schemes (PEFC).

- *SFI 2022 Forest Management Standard*
- [*SFI Small Lands Group Certification Module*](#)
- [*SFI Small Scale Forest Management Module for Indigenous Peoples and Families*](#)
- Canadian Standards Association (CAN/CSA-Z809)
- Canadian Standards Association (CAN/CSA-Z804)
- *American Tree Farm System* (ATFS) individual and group certification

2. The definition of the Small Lands Group Certification Module was added.

[SFI Small Lands Group Certification Module: A collaboratively developed group certification module based on the foundation of the *SFI 2022 Fiber Sourcing Standard* and incorporates the AFF Standards of Sustainability for Forest Management under the American Tree Farm System \("AFF Standards"\). The principles and requirements detail processes for forest management by *group certification organizations*.](#)