



**SFI 2022 ~~Chain-of-Custody~~Chain-of-Custody
Standard
(Section 4)**

March 1, 2021

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SFI Inc. is an independent, non-profit, charitable organization dedicated to promoting sustainable forest management in North America and supporting responsible procurement globally. The SFI Board is a three-chamber Board of Directors representing environmental, social and economic interests equally, and the program addresses local needs through its grassroots network of 34 SFI Implementation Committees across North America. SFI Inc. directs all elements of the SFI program including the SFI forest management, fiber sourcing, and chain-of-custody standards, labeling and marketing.

Consumers in growing numbers want assurance that their buying decisions represent a sound environmental choice. They are asking for proof that wood, paper and packaging products are made with raw materials from certified forest content or certified sourcing. The SFI 2022-15-2019 Chain-of-Custody Standard and Associated Labels, implemented together with certification to the SFI 2022-15-2019 Forest Management and Fiber Sourcing Standards and the SFI Rules For Use of On Product Labels and Off Product Marks, delivers a reliable and credible mechanism so businesses can provide this assurance to customers.

Program Participants Certified Organizations practice responsible forestry on the lands they manage and, once they are successfully audited by an independent SFI certification body, they can make claims about SFI forest management certification and access SFI certified content labels. They also need to achieve a separate third-party chain-of-custody certification.

Chain-of-custody is an accounting system process that tracks wood fiber through the different stages of production. Companies can make claims about how much of their product comes from certified lands, how much contains post-consumer recycled content, and how much is responsibly sourced fiber through unique SFI fiber sourcing certification. These claims can be made based on either the physical separation or percentage-based methods of tracking certified forest content and certified sourcing.

The SFI program addresses the fact that only 10 percent of the world's forests are certified through procurement requirements in the SFI 2022-15-2019 Fiber Sourcing Standard requiring that Program Participants Certified Organizations establish adequate measures to ensure all the fiber they source is from legal and responsible sources, regardless of whether it is from certified or uncertified forests. The SFI program meets guidelines on environmental claims in product advertising and communication issued by the U.S. Federal Trade Commission and guidelines on environmental labeling and advertising issued by the Competition Bureau of Canada.

Studies have shown that consumers appreciate the value of forest certification in helping them identify wood and paper products from legal, responsible sources.

The fact that the SFI program can deliver a steady supply of fiber from well-managed forests is especially important at a time when there is increasing

Part 1: General

1.1 Scope

What the ~~Chain-of-Custody~~ **Chain-of-Custody** Standard Does

The ~~SFI 2022-15-2019 Chain-of-Custody~~ *Chain-of-Custody Standard* is an accounting system that tracks forest fiber content through production and manufacturing to the end product. Companies can use ~~chain-of-custody~~ **Chain-of-Custody** certification to track and communicate how much of their product comes from certified lands, certified *fiber sourcing*, *recycled content* and/or non-certified *forest content*.

What the ~~Chain-of-Custody~~ **Chain-of-Custody** Standard Covers

The ~~SFI 2022-15-2019 Chain-of-Custody~~ *Chain-of-Custody Standard* applies to any organization that sources, processes, manufactures, handles, trades, ~~converts~~ **converts**, or prints forest-based products.

~~A wood producer delivering roundwood or field chips direct from the forest to a manufacturing facility does not need to be certified to the SFI 2022-Chain-of-Custody~~ **Chain-of-Custody Standard.**

~~A certified organization~~ **An SFI-certified organization (such as a warehouse or distribution center) that passes on SFI certified material/product does not need an SFI chain-of-custody** ~~Chain-of-Custody~~ system provided the SFI certified material/product is in its original packaging and the material/product is identified with an SFI ~~chain-of-custody~~ **Chain-of-Custody on-product label.**

Geographic Application of the ~~Chain-of-Custody~~ **Chain-of-Custody** Standard

The ~~SFI 2022-15-2019 Chain-of-Custody~~ *Chain-of-Custody Standard* applies to any organization globally.

1.2 Additional Requirements

Primary producers must also conform to the ~~SFI 2022-15-2019~~ *Fiber Sourcing Standard*.

~~Primary and secondary producers with a valid SFI 2022-Chain-of-Custody~~ **Chain-of-Custody certificate can use their chain-of-custody** ~~Chain-of-Custody~~ procedures to make SFI-~~c~~ **Certified s** ~~Sourcing~~ claims or apply the SFI-~~c~~ **Certified s** ~~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~~ **SFI on-product labels** and claims shall follow Section ~~65~~ **Rules for Use of SFI On-Product Labels and Off-Product Marks** as well as ISO 14020:2000.

Commented [SFI 1]: Edit calling out the ability of primary or secondary producers with SFI CoC to use their CoC to apply Certified Sourcing claims or labels to product.

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 Guide 65:1996 General Requirements for bodies operating product certification systems
- ii. ISO/IEC 17065:2012 ~~—~~ Conformity Assessment ~~—~~ Requirements for bodies certifying product, process, and services
- iii. ISO/IEC Guide 2:2004 Standardization and related activities ~~—~~ General vocabulary
- iv. ISO 14020:2000 Environmental labels and declarations ~~—~~ General principles
- v. Section 2 ~~—~~ *SFI 202215-2019 Forest Management Standard*
- vi. Section 3 ~~—~~ *SFI 202215-2019 Fiber Sourcing Standard*
- vii. [Section 4 ~~—~~ *SFI 2022 Chain-of-CustodyChain-of-Custody Standard*](#)
- viii. [Section 5 ~~—~~ *SFI 2022 Certified Sourcing Standard*](#)
- ixvii. Section ~~65~~ ~~—~~ Rules for Use of *SFI*-On-Product Labels and Off-Product Marks
- xviii. Section ~~87~~ ~~—~~ *SFI Policies*
- xi. Section ~~109~~ ~~—~~ Appendix 1: Audits of Multi-Site Organizations
- xj. Section ~~124~~ ~~—~~ Public Inquiries and Official Complaints
- xij. Section ~~143~~ ~~—~~ SFI Definitions

For the purposes of this standard, the relevant definitions given in ISO/IEC Guide 2:2004 and ISO 9000:2005 apply, together with the definitions in the SFI Definitions (Section ~~143~~).

Informative References

- i. ISO 9000:2005 Quality management systems ~~—~~ Fundamentals and vocabulary
- ii. ISO 9001:20~~1508~~ Quality management systems ~~—~~ Requirements
- iii. ISO 14001:20~~1504~~ Environmental Management Systems ~~—~~ Specification with guidance for use

- iv. PEFC ST 2002:2020~~13~~ ~~Chain-of-Custody~~Chain-of-Custody -of Forest-Based Products ~~---~~ Requirements, ~~February~~May 24 2020~~13~~
- v. Section 76 ~~---~~Guidance to SFI 2022~~15~~-2019 Standards
- vi. Section 109 ~~---~~SFI 202~~15~~-2019 Audit Procedures and Auditor Qualifications and Accreditation

Part 2: Requirements for Chain of Custody Process—Physical Separation Method

2.1 General Requirements for Physical Separation

- 2.1.1 The ~~SFI-certified organization~~ ~~certified organization~~ applying the physical separation method shall ensure that the *certified forest content* is separated or controlled to ensure it is not mixed with or replaced by uncertified content.
- 2.1.2 The ~~SFI-certified organization~~ ~~certified organization~~ whose *certified forest content* and *recycled content* inputs are not mixed with other raw material, should use physical separation as the preferred option.
- 2.1.3 An ~~SFI-certified organization~~ ~~n-certified organization who that~~ makes SFI claims or uses the SFI ~~on~~On-product ~~Product label~~Label in association with *non-timber forest products* shall apply the physical separation method to ensure *non-timber forest products* are sourced from SFI-certified lands.

Commented [SFI 2]: Moved sections so all methods are under one section and claims and inputs under another section.

Commented [SFI 3]: Edit to restore the title “Physical Separation Method” to align with title in Part 3.

2.2 Identification of the *Origin*

2.2.1 Identification at Delivery Level

The *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*;
- i. — *SFI Certified Forest Content* — Raw material from a forest certified to an *acceptable forest management standard* constitutes a claim of 100 percent *certified forest content*
- ii. — *SFI Certified Sourcing*
- iii. — *Post-Consumer Recycled*
- iv. — *Pre-Consumer Recycled*
- v. — *SFI Recycled Content*
- e. — The supplier's chain-of-custody number, if applicable.

This information can be documented in the form of, but not limited to, an invoice, bill of lading, shipping document, letter, or other forms of communications between the *organization* and the next entity in the supply chain.

Note 1: The categories of the *origin* of raw material are specified in the *SFI Definitions* (Section 13):

Note 2: An *organization* (e.g., printer or lumberyard) that uses the physical separation method and sources inputs from a supplier that uses the percentage-based method must know the percentage of *certified content* if it wants to label products or make claims about them.

2.2.2 Identification at Supplier Level

The *organization* shall obtain or access confirmation documentation for all suppliers of the *certified forest content*, which proves that the criteria set for the supplier have been met.

Commented [SFI 4]: Moved to new section after Part 2 Requirements for Chain-of-Custody Process.

2.2 Separation of the *Certified Content*

- 2.2.1** *Certified content* shall remain clearly identifiable throughout the entire sourcing production, trading and sales process. This shall be achieved by:
- physical separation in terms of production and storage space or
 - physical separation in terms of time; or
 - permanent identification of the *certified content*.

2.2.2 Verification that *certified content* is controlled during the production, trading, and sales process to ensure it is not replaced by uncertified material.

2.4 Sale of Certified Content Products

2.4.1 At the point of sale or transfer of the certified products to another entity, the *organization* shall provide the next entity in the chain with written information confirming the supplier's certification status and an official *SFI* claim statement providing a clear indication of input category. This can be in the form of, but not limited to, an invoice, bill of lading, shipping document, letter or other forms of communications available to the customer at the time of the sale of the product.

2.4.2 The *organization* shall ensure that documentation of the certified products clearly states at least the following information

- organization's identification;
- quantity of delivery;
- date of delivery / delivery period / accounting period;
- an official *SFI* claim;
 - SFI X% Certified Forest Content
 - SFI X% Recycled Content
 - SFI X% Pre-Consumer Recycled
 - SFI X% Post-Consumer Recycled
 - SFI X% Certified Sourcing
(Note: Percentages of any combination of the above are permissible.)
 - SFI at Least X% Certified Forest Content
- the organization's chain-of-custody number.

2.4.3 If the *organization* uses the off-product mark or on-product label, both on-product and off-product usage shall be carried out according to the terms and conditions of the *Office of Label Use and Licensing* and the *Rules For Use of SFI On-Product Labels and Off-Product Marks* (Section 5 in the *SFI 2015-2019 Standards and Rules*).

Commented [SFI 5]: Moved to new section after Part 2. Requirements for Chain-of-Custody Process.

Part 3: Requirements for Chain-of-Custody Process – Mixing of Inputs – Average Percentage Method and Volume Credit Method (Mixed Inputs)

Commented [SFI 6]: Comments asking to adopt PEFC terminology for CoC Methods – Percentage and Credit Methods

3.1 General Requirements for Mixed Input of Inputs

Commented [SFI7R6]: Subgroup decided that adopting PEFC terminology for Percentage Method and Credit Method were a positive change. Closer alignment with PEFC CoC.

The percentage-based method applies to *SFI-certified organizations certified organizations* with facilities where *certified content* is mixed with non-certified forest inputs that cannot be clearly identified in the output products. *Where certified content is*

mixed with non-certified forest inputs that cannot be clearly identified in the output products, ~~SFI-certified organizations certified organizations~~ shall use either the Average Percentage Method or the Volume Credit Method.

Commented [SFI 8]: Edit to make direct reference to the Avg. Percentage or Vol. Credit Methods.

3.2 Definition of the *Product Group*

3.2.1 The ~~certified organization SFI-certified organization~~ shall implement the requirements for the ~~chain-of-custody Chain-of-Custody~~ process of this standard for the specific *product group*.

3.2.2 The ~~SFI-certified organization certified organization~~ shall identify its *product group(s)* based on the following criteria:

- raw material included in the products covered by the *product group*;
- production site at which the products covered by the *product group* have been produced;
- time period over which the products covered by the *product group* have been produced, ~~or~~ sold ~~or~~ transferred.

3.2.3 The *product group* shall be associated with (i) a single product or (ii) a group of products, which consist of the same or similar input raw material based on, for example, species, sort or substitutability within products (e.g., SPF lumber contains multiple tree species but may be treated as a single *product group*).

3.2.4 The ~~SFI-certified organization certified organization~~ shall identify an entity within the organization for which the *product group* is defined and only products produced or controlled by that entity shall be included within the *product group*. The *product group* may cover several sites.

Note: The entity may be a standalone manufacturing facility, a forest contractor with multiple harvest sites, a trader or distributor with multiple suppliers, a remanufacturing facility supplied by multiple primary manufacturers or a centralized sales department within an organization with responsibility for multiple manufacturing units.

Commented [SFI 9]: Edit to make this text part of the main clause.

Commented [SFI10R9]: Group decided to retain the use of NOTE to align with PEFC and to provide context.

Applies to all references to NOTE below.

3.2.5 For credibility purposes the maximum *claim period* is three months.

3.2.6 The ~~SFI-certified organization certified organization~~ shall identify all products included in the *product group* covered by the ~~chain-of-custody Chain-of-Custody~~ *claim period* so it is possible to determine the *product group* to which the products belong. The identifier can be a unique number or a name that all products within the *product group* belong to.

Note: Physical on-product identification of the *product group* is not required if the certification percentage is applied to sold or transferred products as the *product group* identification is evident from the sale or delivery documents. However, products that carry the SFI on-product label must be accompanied by the associated claim statement.

~~3.3 Identification of the Origin~~

~~3.3.1 Identification at Delivery/Receipt Level~~

~~The organization shall identify and verify the category of origin of all procured raw material that is received. Associated documents with delivery and receipt of raw material shall include at least:~~

- ~~a. supplier identification,~~
- ~~b. quantity of delivery,~~
- ~~c. date of delivery / delivery period / claim accounting period,~~
- ~~d. category of origin,~~
- ~~i. SFI Certified Forest Content — Raw material from a forest certified to an acceptable forest management standard constitutes a claim of 100 percent certified forest content~~
- ~~ii. SFI Certified Sourcing~~
- ~~iii. Post-Consumer Recycled~~
- ~~iv. Pre-Consumer Recycled~~
- ~~v. SFI Recycled Content~~
- ~~e. the supplier's chain-of-custody number, if applicable.~~

~~This information can be documented in the form of, but not limited to, an invoice, bill of lading, shipping document, letter, or other forms of communications between the organization and the customer.~~

~~Note: The categories of the origin of raw material are specified in SFI Definitions (Section 13):~~

~~3.3.2 Identification at Supplier Level~~

~~The organization shall verify the validity and scope of the forest management, fiber sourcing or chain-of-custody certificate.~~

Commented [SFI 11]: Nearly duplicate language - Identification of the Origin section moved after Part 2 Requirements for COC Process.

~~3.34 Calculation of the Certified Percentage~~

- ~~3.34.1 The certified organization SFI-certified organization shall calculate the certification percentage separately for each claim period according to the following formula:~~

$$Pc = \frac{Vc}{Vc + Vo} \times 100$$

$$P_c [\%] = \frac{V_c}{V_c + V_o} \cdot 100$$

P_c Certification percentage
V_c *Certified content*
V_o Other raw material (*certified sourcing*)

~~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~~Chain-of-Custody tracking.

3.34.2 The ~~SFI-certified organization~~ *certified organization* shall calculate the certification percentage based on a single measurement unit used for all raw material covered by the calculation. The ~~Chain-of-Custody~~ *certified organization* shall use only official conversion ratios and methods. If a suitable official conversion ratio does not exist, the organization shall define and use a reasonable and credible internal conversion ratio.

~~Note:~~ The Conversion Factor/Ratio is calculated by dividing the output (volume or weight) by the input (volume or weight) and is applied to each individual input component of a *product group*.

3.34.3 If the procured raw material includes only a proportion of *certified content*, then only the quantity corresponding to the actual certification percentage claimed by the supplier can enter the calculation formula as *certified content*. The rest of that raw material shall enter the calculation as other raw material.

3.34.4 The ~~SFI-certified organization~~ *certified organization* shall calculate the certification percentage either as a simple or rolling *average* percentage. Refer to Appendix 1 of this document for the definitions of simple and rolling *average percentage* calculations.

3.34.5 The ~~SFI-certified organization~~ *certified organization* applying the simple certification percentage shall base the calculation of P_c (the certification percentage) for each *product group* on the figures for V_c (*certified content*) and V_o (other raw material) for that specific *product group*. As a result, it is necessary for the organization applying this method to know the percentage of *certified content* before any product of the *product group* is sold or transferred.

The *claim period* shall not exceed three months of production.

3.34.6 The ~~SFI-certified organization~~ *certified organization* applying the rolling *average certification* percentage shall base the calculation of P_c (the certification

percentage) for each *product group* and *claim period* on the figures for Vc (*certified content*) and Vo (other raw material) for a specified number of prior *claim period*.

The time period covered by the specified number of prior *claim periods* shall not exceed 12 months.

3.45 Average Percentage Method

3.45.1 The ~~SFI-certified organization~~ *SFI-certified organization* applying the *average percentage method* can claim all the products covered by the *claim period*, provided that the *percentage of certified content* is clearly communicated. ~~In order to~~ *To* use the SFI label, the organization must meet a ~~70-percent-% certified content~~ *70-percent-% certified content* threshold. ~~The following label may be used.~~ *If recycled content is not used, then the label must just state, "Promoting Sustainable Forestry."*



3.45.2 If an ~~SFI-certified organization~~ *SFI-certified organization* falls below the ~~70-percent-% certified content~~ *70-percent-% certified content* threshold, the organization shall be transparent and communicate the actual percentage of *certified content*. ~~The following two labels may be used.~~

3.56 Volume Credit Method

3.56.1 The ~~certified organization~~ *SFI-certified organization* shall apply the *volume credit method* for a single claim. The *organization* receiving a single delivery of material with more than one claim relating to the category of *origin* shall either use it as a single inseparable claim (e.g., *SFI/PEFC certified content*) or shall only use one from the received claims (*SFI* or *PEFC certified*) for calculating the *volume credits*. The *volume credits* shall be distributed to the output products from the *volume credit account* in a way that all products sold as certified are sold as ~~100-percent-% certified~~ *100-percent-% certified*.

3.56.2 The ~~certified organization~~ *SFI-certified organization* shall recognize *volume credits* in a single measurement unit used for all raw material inputs and shall enter the *volume credits* into the credit account. The credit account may be established for individual product types of the *product group* or for the whole *product group* where the same measurement unit is applied to all product types.

3.56.3 The ~~certified organization~~ *SFI-certified organization* shall calculate the *volume credits* using either:

Commented [SFI 12]: Comments to align methods terminology with PEFC CoC terminology – Percentage Method

Commented [SFI13R12]: Subgroup decided that adopting PEFC terminology is a positive change.

Commented [SFI 14]: label use examples moved from this section. Only claims are listed. Labels are all included in Section 5.

Commented [SFI 15]: Edit to align with PEFC CoC terminology – Credit Method

- a. ~~_____~~ certification percentage (clause 3.34) and volume of output products (clause 3.56.4) or
- b. ~~_____~~ input material (*certified forest content / pre-consumer recycled / post-consumer recycled*) and input/output ratio (clause 3.56.5).

3.56.4 The ~~certified organization~~*SFI-certified organization* applying the certification percentage shall calculate the ~~volume~~ credits by multiplying the volume of output products of the *product group* by the certified percentage.

3.56.5 The ~~certified organization~~*SFI-certified organization* must demonstrate a verifiable ratio between the input material and output products. The ~~volume~~ credits may be calculated directly from the input certified material by multiplying the volume of the input certified material by the input/output ratio and accounting for manufacturing losses.

3.56.6 The labels used for the ~~Volume~~ Credit method are shown in Section 6. Rules for Use of SFI On-Product Labels and Off-Product Marks. ~~shall be as follows:~~

3.56.7 The ~~certified organization~~*SFI-certified organization* can accumulate the *SFI* Certified Credits or Recycled Credits by creating a ~~volume~~ credit account, which can be used for the next *claim period*.

a. The total quantity of credits cumulated at the credit account cannot exceed the sum of credits entered into the credit account during the last ~~12~~ *24* months.

b. ~~An certified organization~~*SFI-certified organization* ~~that is using the Volume Credit method but has yet to complete its initial certification using the Volume Credit method~~ can start counting all eligible credit after the completion of a successful internal audit of the ~~chain of custody~~Chain-of-Custody system and completion of a management review of the ~~chain of custody~~Chain-of-Custody system performance. Eligible credits can be accumulated up to 365 days prior to the initial registration audit. Accumulated credits can be utilized for the sale of products only after successful completion of the registration audit and receipt of the ~~chain of custody~~Chain-of-Custody certificate from their certification body.

Commented [SFI 16]: Alignment with PEFC.

Commented [SFI 17]: Edit made to clarify when the credit accumulation can begin.

Commented [SFI 18]: This was moved from guidance (Section 6 - 14.4) into the COC standard.

3.7 Sale of Products

3.7.1 ~~At the point of sale or transfer of the certified products to the next entity in the supply chain, the organization shall provide customers with written information confirming the supplier's certified status and an official SFI claim statement. This can be in the form of, but not limited to, an invoice, bill of lading, shipping document, letter, or other forms of communications available to the customer at the time of the sale of the product.~~

3.7.2 The ~~organization~~ shall ensure that documentation of the certified products clearly states at least the following information:

- a. ~~organization's identification,~~
- b. ~~quantity of delivery,~~
- c. ~~date of delivery / delivery period / claim period~~
- d. ~~an official SFI claim statement:~~
 - i. ~~Average Percentage Users:~~
 - X% ~~Certified Forest Content~~
 - X% ~~Recycled Content~~
 - ii. ~~Volume Credit Users:~~
 - SFI Volume Credit or 100% as calculated under the volume credit method.
- e. ~~the organization's chain-of-custody number.~~

3.7.3 If the ~~organization~~ uses the logo, both on product and off-product usage shall be carried out according to the terms and conditions of the *Office of Label Use and Licensing* and the **Section 5 – Rules for Use of SFI On-Product Labels and Off-Product Marks**, in the *SFI 2015-2019 Standards and Rules document*.

Part 4: Identification of the Origin

42.1 2-1 Identification at Delivery Level

The ~~certified organization~~ *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,~~
 - i. ~~100X% SFI X% Certified Forest Content – Raw material from a forest certified to an acceptable forest management standard constitutes a claim of 100-percent 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 Volume Credit or 100% as calculated under the volume 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-percent-% certified forest content*

Commented [SFI 19]: Moved into sales section below.

Commented [SFI20]: New separate section following Requirements for COC Process.

Commented [SFI 21]: Edit to align with 100% in claim text.

Commented [SFI22R21]: Edit accepted.

Commented [SFI 23]: Edit to align with 100% in claim text.

Commented [SFI24]: Group decided to allow both options: SFI Credit or 100% as calculated under the Credit Method **OR** permit the use of Volume Credit as before.

This will be addressed in Section 6 – Rules for Labels Use – clarify that the two options are equivalent. Both are acceptable. Timeline for change over needs to account for Company process, etc.

Commented [SFI25]: New – non timber forest products claim

Commented [SFI26]: Directly from SFI Forest management certified organization.

Commented [SFI27]: Categories of origin arranged to align with list of SFI Claims.

e. ~~The supplier's SFI 2022 Forest Management Standard or SFI 2022 Chain of Custody Chain-of-Custody Standard certificate~~ chain-of-custody number, as if applicable.

Commented [SFI 28]: Edit to recognize that a FM supplier can supply 100% certified forest content.

This information can be documented in the form of, but not limited to, an invoice, bill of lading, shipping document, letter, or other forms of communications between the ~~certified-organization~~ SFI-certified organization and the next entity in the supply chain.

Note 1: The categories of the origin of raw material are specified in the SFI Definitions (Section 14).

Note 2: An ~~non-certified-organization~~ SFI-certified organization (e.g., printer or lumberyard) that uses the physical separation method and sources inputs from a supplier that uses the percentage-based method must know the percentage of *certified content* if it wants to label products or make claims about them.

4.2.2-2 Identification at Supplier Level

The ~~certified-organization~~ SFI-certified organization shall obtain or access confirmation documentation for all suppliers of the ~~certified forest content~~, which proves that the criteria set for the supplier have been met.

Commented [SFI 29]: Edit made – should be “certified content”.

Part 5: Sale of Certified Content Products

Commented [SFI30]: Moved from 2.4 under physical separation. Merged with 3.7 under mixed inputs.

5.1 At the point of sale or transfer of the certified products to another entity, the ~~certified organization~~ SFI-certified organization shall provide the next entity in the chain with written information confirming the supplier's certification status and an official SFI claim statement providing a clear indication of input category. This can be in the form of, but not limited to, an invoice, bill of lading, shipping document, letter or other forms of communications available to the customer at the time of the sale of the product.

5.2 The ~~certified-organization~~ SFI-certified organization shall ensure that documentation of the certified products clearly states at least the following information

- a. certified organization's identification,
- b. quantity of delivery,
- c. date of delivery / delivery period / accounting period,
- d. an official SFI claim,
 - i. SFI X% Certified Forest Content
 - ii. SFI X% Recycled Content
 - iii. SFI X% Pre-Consumer Recycled
 - iv. SFI X% Post-Consumer Recycled
 - v. SFI X% Certified Sourcing or SFI Certified Sourcing
(Note: Percentages of any combination of the above are permissible.)

Commented [SFI31]: Claim alignment. 'SFI' portion of claim not required.

- vi. SFI Volume Credit or 100% as calculated under the volume credit method.
- vii. SFI at Least X% Certified Forest Content
- viii. SFI 100% from a Certified Forest
- ix. SFI 100% Certified Forest Content
- e. the ~~certified organization~~ *SFI-certified organization's chain-of-custody* Chain-of-Custody number.

Commented [SFI32]: Group decided to allow both options: SFI Credit or 100 % as calculated under the Credit Method **OR** permit the use of Volume Credit as before.

This will be addressed in Section 6 – Rules for Labels Use – clarify that the two options are equivalent. Both are acceptable. Timeline for change over needs to account for Company process, etc.

Commented [SFI33R32]: SFI is aligning Section 6, Part 3, 3.1 SFI Chain-of-Custody Labels and Claims with task group recommendations to Section 4 on credit and methods and claims. Guidance will be developed to clarify expectations re. transition timeline for switching to use of Credit and dropping Volume Credit in claims / labels.

Commented [SFI34]: New – “non timber forest products” claim

Commented [SFI35]: Directly from SFI Forest management certified organization.

Commented [SFI36]: Moved from under physical separation because this applies to all input process types.

5.3 If the ~~certified organization~~ *SFI-certified organization* uses the off-product mark or on-product label, both on-product and off-product usage shall be carried out according to the terms and conditions of the *Office of Label Use and Licensing* and the Rules For Use of *SFI On-Product Labels* and *Off-Product Marks* (Section 6 in the *SFI 202215-2019 Standards and Rules*).

Part 6: Reporting Requirements

6.1 Primary or secondary producers outside the United States and Canada must submit to the *SFI Office of Label Use and Licensing*.

Specific examples of proposed *SFI* on-product label use and related promotional literature to the *Office of Label Use and Licensing*, in keeping with the Rules For Use of *SFI On-Product Labels* and *Off-Product Marks* (Section 6 in the *SFI Standards and Rules* document).

Commented [SFI37]: New section and requirement. Aligns with approach from Certified Sourcing Standard.

Part 24: Due Diligence System to Avoid Controversial Sources

24.1 Definition of Controversial Sources

- a. Forest activities which are not in compliance with applicable state, provincial, federal, or international laws.
- b. Forest activities ~~which~~ that 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 *International Labour Organization (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.

Commented [SFI38]: Aligns with new DDS for fiber sourcing and certified sourcing.

Commented [SFI 39]: Edit requesting addition of AZE and KBAs as examples of special sites requiring protection.

- h. ~~Conflict Timber~~
- i. ~~Genetically modified trees via forest tree biotechnology~~

Commented [SFI 40]: New definition of controversial sources – aligns with PEFC definition.

- a. ~~Forest-based products which are not in compliance with applicable state, provincial or federal laws, particularly as they may relate to: conversion sources, legally required protection of threatened and endangered species, requirements of CITES (The Convention on International Trade in Endangered Species of Wild Fauna and Flora) legally required management of areas with designated high environmental and cultural values, labor regulations relating to forest workers, Indigenous Peoples' property, tenure and use rights~~
- b. ~~Forest-based products from illegal logging~~
- c. ~~Forest-based products from areas without effective social laws~~

74.2 Verification of Purchased Product(s) Access to Information Access to Information

~~To avoid controversial sources, the organization shall obtain and verify the scope of an SFI Section 2 (SFI 2015–2019 Forest Management Standard), Section 3 (SFI 2015–2019 Fiber Sourcing Standard), Section 4 (SFI 2015–2019 Chain of Custody Standard), or other credible chain of custody standard certificate. Verification shall ensure that the facility and the purchased product(s) are directly associated with the certification. This can be achieved through the following:~~

- a. ~~On a valid SFI Section 2 (SFI 2015–2019 Forest Management Standard), Section 3 (SFI 2015–2019 Fiber Sourcing Standard), Section 4 (SFI 2015–2019 Chain of Custody Standard), or other credible chain of custody standard certificate or appendix to the certificate.~~
- b. ~~On a publicly available product group listing, or~~
- c. ~~By other means of verification.~~

~~Where inspection of the certificate and other supporting evidence can demonstrate that the facility and product groups are within scope of the certificate, then the organization purchasing that product group can credibly conclude that the products being sourced are low risk of coming from controversial sources.~~

74.2.1 ~~The certified organization~~ *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.

- 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 or region of harvest of the material.

Commented [SFI 41]: Replaces former 4.2 Verification of Purchased Products

74.2.2 The ~~certified organization~~*SFI-certified organization* can consider forest based products low risk and exempt from further 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~~Chain-of-Custody Standard)*, or other *credible ~~chain-of-custody~~Chain-of-Custody standard* certificate ~~and/or the due diligence system~~;
- d. Procured ~~from a supplier~~ with a valid *SFI Section 5 (SFI Certified Sourcing Standard)* certificate ~~and/or the due diligence system~~; or
- e. Sourced from recycled forest-based products.

Commented [SFI 42]: Clarifying edit in response to comment. See a. – e.

Commented [SFI143]: Avoidance of Controversial Sources Subgroup edit.

74.3 Conducting a Risk Assessment ~~Develop and Implement a Due Diligence System~~

74.3.1 The ~~certified organization~~*SFI-certified organization* shall develop and implement a Due Diligence System (DDS) to ~~assess and~~ manage the risk of sourcing forest-based products from *controversial sources* in accordance with the requirements of this standard.

Commented [SFI144]: Avoidance of Controversial Sources Subgroup edit.

Commented [SFI145]: Avoidance of Controversial Sources Subgroup edit.

74.3.2 The DDS risk assessment shall classify material into ~~“low-”~~ and ~~“high-”~~ risk categories

74.3.3 The risk assessment shall be carried out at the regional level unless risk is consistent at the national level.

74.3.4 The ~~certified organization~~*SFI-certified organization* shall review, and if necessary, revise its risk ratings on at least an annual basis.

74.3.5 The ~~certified organization~~*SFI-certified organization* shall conduct a risk assessment before the first time of delivery for each new region of supply.

~~When forest-based products, excluding recycled content, are procured without a valid SFI Section 2 (SFI 2015–2019 Forest Management Standard), Section 3 (SFI 2015–2019 Fiber Sourcing Standard), Section 4 (SFI 2015–2019 Chain-of-Custody Standard), or other credible chain-of-custody standard certificate, the 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. The Organization’s Due Diligence System shall~~

~~4.3.1 Conduct a risk assessment of sourcing forest-based products which are not in compliance with applicable state, provincial or federal laws, particularly as they may relate to:~~

~~conversion sources,~~

~~legally required protection of threatened and endangered species, requirements of CITES (The Convention on International Trade in Endangered Species of Wild Fauna and Flora)~~

~~legally required management of areas with designated high environmental and cultural values,~~

~~labor regulations relating to forest workers,~~

~~Indigenous Peoples’ property, tenure and legally established use rights~~

~~The risk assessment shall be carried out at the national level and where risk is not consistent, at the appropriate regional level.~~

~~4.3.2 Conduct a risk assessment of sourcing forest-based products from illegal logging~~

~~4.3.3 Conduct a risk assessment of sourcing forest-based products from areas without effective social laws addressing the following:~~

~~a. workers’ health and safety;~~

~~b. fair labor practices;~~

~~c. Indigenous Peoples’ rights;~~

~~d. anti-discrimination and anti-harassment measures;~~

~~e. prevailing wages; and~~

~~f. workers’ right to organize.~~

Commented [SFI 46]: Replaced with updated DDS to align with PEFC.

74.4 Substantiated Concerns Due to Organization’s Risk Assessment

Implementing Program to Address Risk

~~Where the risk assessment conducted under 4.3 determines other than low risk, the organization shall implement a program to mitigate such risk and~~

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~~require a signed contract and/or self-declaration that the supplied forest-based product does not originate from controversial sources;~~

74.4.1 The ~~-certified organization~~*SFI-certified organization* shall have a *program* to assess any substantiated concern. A substantiated concern is information supported by proof or evidence, indicating that forest-based material originates in *controversial sources*. Substantiated concerns can be concerns by third parties, as well as concerns of the ~~-certified organization~~*SFI-certified organization* itself.

Commented [SFI 47]: Replaced by new 7.5.

74.4.2 The ~~-certified organization~~*SFI-certified organization* shall update its risk assessment to reflect substantiated concerns associated with a region of origin identified through internal data or public data.

Commented [SFI 48]: New requirements to add substantiated concerns – alignment with the PEFC requirements.

74.5 Management of “High”-Risk Forest-Based Products

74.5.1 Where the risk assessment determines high risk, the ~~-certified organization~~*SFI-certified organization* shall implement a *program* to mitigate such risk and require a signed contract and/or self-declaration that the supplied forest-based product does not originate from *controversial sources*.

74.5.2 For each supply source where the risk is high, the risk assessment shall also identify the specific verifiable controls that the ~~-certified organization~~*SFI-certified organization* has in place to substantially reduce the risk of sourcing forest-based products from *controversial sources*.

74.5.3 Where an ~~-certified organization~~*SFI-certified organization* receives forest-based products, and then learns these forest-based products ~~may be~~ *from controversial sources, if possible, these forest-based products shall must be* segregated and prevented from entering the ~~chain-of-custody~~*Chain-of-Custody system. If avoidance is not achieved* If forest-based product has already entered the ~~chain-of-custody~~*Chain-of-Custody system and cannot be segregated additional corrective measures shall must be implemented to avoid future controversial sources. If subsequent verification demonstrates that the risk of this fiber originating from controversial sources is low, these forest-based products can re-enter the chain-of-custody**Chain-of-Custody system.*

Commented [SFI49]: Avoidance of Controversial Sources Subgroup edit.

Commented [SFI50]: Avoidance of Controversial Sources Subgroup edit.

74.5.4 The ~~-certified organization~~*SFI-certified organization* shall identify the verifiable measures that the ~~-certified organization~~*SFI-certified organization* must implement 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:

- Assessing the operating effectiveness of verifiable measures, through field-based verification.
- For direct sources, include field and document verification of *controversial sources* risk factors back to the forest units from which fiber is sourced.
- 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.

74.5.5 Where sampling is conducted as part of the verification program, the sampling program shall be risk based to draw valid conclusions across all fiber inputs.

74.6 Avoidance of Controversial Sources

74.6.1 Where the verifiable measures 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.

Part 85: Minimum Management System Requirements

85.1 General Requirements

The ~~certified organization~~SFI-certified organization shall operate a management system in accordance with the following elements of the ~~SFI 2022-2019 Chain-of-Custody~~Chain-of-Custody Standard, which ensure correct implementation and maintenance of the ~~chain-of-custody~~Chain-of-Custody process. The management system shall be appropriate to the type, range and volume of work performed.

Note: An ~~n-certified organization~~SFI-certified organization's quality (ISO 9001:2015) or environmental (ISO 14001:2015) management system can be used to meet the minimum requirements for the management system defined in this standard.

85.2 Responsibilities and Authorities for Chain-of-Custody

85.2.1 The ~~certified organization~~SFI-certified organization's top management shall define and document its commitment to implement and maintain the ~~chain-of-custody~~Chain-of-Custody requirements, and make this available to its personnel, suppliers, customers, and other interested parties.

85.2.2 The ~~certified organization~~SFI-certified organization's top management shall appoint a member of the management who, irrespective of other responsibilities, shall have overall responsibility and authority for the ~~chain of custody~~Chain-of-Custody.

85.2.3 The ~~certified organization~~SFI-certified organization's top management shall carry out a regular periodic review of the ~~chain-of custody~~Chain-of-Custody and its compliance with the requirements of this standard.

85.2.4 The ~~certified organization~~ *SFI-certified organization* ~~organization~~ shall demonstrate its commitment to comply with the social, health and safety requirements defined in this standard, including the spirit of ILO Declaration on Fundamental Principles and Rights at Work (1998).

Commented [SFI 51]: Added to align with PEFC CoC Standard requirement 4.10

85.2.54 The ~~certified organization~~ *SFI-certified organization* ~~organization~~ shall identify personnel performing work affecting the implementation and maintenance of the ~~chain of custody~~ *Chain-of-Custody*, and establish and set responsibilities and authorities relating to the ~~chain of custody~~ *Chain-of-Custody* process:

- a. raw material procurement and identification of the *origin*;
- b. product processing covering physical separation, ~~or~~ percentage calculation, ~~or~~ *volume credit* and transfer into output products;
- c. product sale and labeling;
- d. record keeping; and
- e. internal audits and nonconformity control.

Commented [SFI 52]: Edit made as per comment for improved clarity.

Note: The responsibilities and authorities for the chain of custody given above can be cumulated.

Commented [SFI53]: Group decided this is redundant with the text above.

8.2.6 *SFI-certified organizations* ~~The certified organizations~~ shall have a system to comply with all applicable social laws at the federal, provincial, state, and local levels in the country in which the *SFI-certified organization* ~~SFI-Certified Organization~~ operates. This includes having a policy demonstrating compliance with social laws, such as those covering civil rights, equal employment opportunities, 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.

Commented [SFI 54]: This was an interpretation which is now incorporated into the Standard. (Interpretation #1, Part 3).

85.3 Documented Procedures

The ~~certified organization~~ *SFI-certified organization's* ~~organization's~~ procedures for the ~~chain of custody~~ *Chain-of-Custody* shall be documented, and include at least the following elements:

- a. description of the raw material flow within the production process;
- b. organization structure, responsibilities and authorities relating to ~~chain of custody~~ *Chain-of-Custody*; and
- c. procedures for the ~~chain of custody~~ *Chain-of-Custody* process covering all requirements of this standard.

85.4 Record Keeping

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

- a. records of all suppliers of forest-based ~~raw~~ material, including information to confirm requirements at the supplier level are met;

Commented [SFI 55]: Edit to reflect that "inputs" are not just direct from the forest.

- b. records of all purchased forest-based raw material, including information on its *origin*;
- c. records that demonstrate how the certification percentage for each *product group* was calculated;
- d. records of all forest-based products sold and their claimed *origin*, including, as applicable, records of movements in *volume* credit accounts;
- e. records of internal audits, nonconformities ~~which that~~ occurred and corrective actions taken; and
- f. records of top management's periodic review of compliance with ~~chain-of-custody~~Chain-of-Custody requirements.

85.4.2 The ~~certified organization~~SFI-certified organization -organization shall maintain the records for a minimum period of three years unless stated otherwise by law.

85.5 Resource Management

85.5.1 Human Resources/Personnel:

The ~~certified organization~~SFI-certified organization -organization shall ensure that all personnel performing work affecting the implementation and maintenance of the ~~chain-of-custody~~Chain-of-Custody shall be competent ~~on the basis of~~based on appropriate training, education, ~~skills~~skills, and experience.

85.5.2 Technical Facilities:

The ~~certified organization~~SFI-certified organization -organization shall identify, ~~provide~~provide, and maintain the infrastructure and technical facilities needed for effective implementation and maintenance of the organization's ~~chain-of-custody~~Chain-of-Custody to meet the requirements of this standard.

85.6 Internal Audit and Management Review

- 8.6.1** The ~~certified organization~~ SFI-certified organization -shall conduct internal audits at ~~least annually, and prior to the initial certification audit, intervals of no more than 18 months~~ covering all requirements of this standard and establish corrective and preventive measures if required, ~~provided they have discussed this approach with their certification body and received prior approval and it agrees.~~ The following requirements shall apply:
- a. ~~for a single site or facility, the internal audit shall be completed prior to the next third party audit.~~
 - b. ~~for a site or facility within the scope of a multi-site certificate, the internal audit shall be completed prior to the third party audit of the central office including the results of the management review of the internal audit of the multi-site certificate.~~
 - c. ~~the internal audit shall address the requirements of 8.6.2 – 8.6.4 and 9.1 – 9.56.~~

85.6.2 The ~~certified organization~~ SFI-certified organization -organization shall conduct the internal audit in accordance with the following requirements:

Commented [SFI56]: Edited to align with PEFC approach to internal audit cycle. Also, aligns with ISO 19011 requirements.

- a. The internal audit shall be undertaken by personnel that have adequate knowledge of the *SFI 2022-2019 Chain-of-Custody* ~~Chain-of-Custody Standard~~;
- b. Off-site interviews and desk audits are permissible; ~~appropriate to the scope and scale of the organization~~;
- c. If there have been no inputs or outputs for a site or manufacturing facility over the past year, internal audits are not required;
- d. If a site or manufacturing facility has had no sales of SFI-certified products over that past year, internal audits are not required;
- e. Internal audits are to assess overall organizational conformance and internal audit documentation can consist of one consolidated internal audit checklist and/or report; and
- f. Where nonconformities are identified during the internal audit process, a Corrective Action Plan shall be developed at the site and/or organizational level.

~~5.6.3 Where the organization has outsourced activities within the scope of its chain of custody, the organization shall develop procedures for the audit of these contractors.~~

~~5.6.4 The internal audit of outsource contractors may be conducted remotely.~~

~~5.6.5 Where there are sufficient outsource contractors the internal audit may use a sampling approach for these contractors.~~

~~5.6.6 The internal audit of outsource contractors shall:~~

- a. ~~determine the level of risk associated with the outsourced activities as determined by Part 6 Outsourcing Agreements.~~
- b. ~~include within the scope of the internal audit those outsourced activities assessed as high risk.~~

Commented [SFI 57]: Moved to Outsourcing.

~~85.6.37~~ The ~~SFI-certified organization-certified organization~~ organization shall have its rationale for remote audits and its sampling procedure audited by its third-party certifier.

~~85.6.48~~ The results of internal audits shall be reported to management for review during the annual management review.

~~8.7 The organization shall establish procedures for dealing with complaints from suppliers, customers, and other parties relating to its chain-of-custodyChain-of-Custody system.~~

Commented [SFI 58]: Subgroup edit. Aligns with PEFC COC requirement re complaints.

Part 96: Outsourcing Agreements

Commented [SFI 59]: 9.1 – 9.2 taken from PEFC ST 2002-2020 clause 4.9 Outsourcing (except Note 1) PEFC definition of outsourcing.

96.1 The ~~certified organization~~ *SFI-certified organization* may outsource activities covered by its ~~SFI chain-of-custody~~ *Chain-of-Custody* to another entity.

96.2 Through all stages of outsourcing the ~~certified organization~~ *SFI-certified organization* shall be responsible for ensuring that all outsourced activities meet the requirements of this standard, including management system requirements. The ~~certified organization~~ *SFI-certified organization* shall have a written agreement with all entities to whom activities have been outsourced, ensuring that:

- a. The material/products covered by the ~~certified organization~~ *SFI-certified organization's SFI chain-of-custody* *Chain-of-Custody* are clearly identified ~~physically separated from other material or products.~~
- b. The ~~certified organization~~ *SFI-certified organization* has access to the entity's site(s) for internal and external auditing of outsourced activities for conformity with the requirements of this standard.
- c. Internal audits of outsourced activities should be conducted at least annually and before the outsourced activity starts.
- d. ~~Records of inputs/outputs are available.~~

Commented [SFI 60]: Edit to recognized that fiber can be separated in other ways other than physical separation,

Commented [SFI 61]: Recommended edit to strengthen the requirement.

Commented [SFI62]: Subgroup edit.

6.1 Outsourcing Agreements

~~Chain-of-custody certificate holders who outsource processing or manufacturing activities on a flexible basis to any one of a number of potential contractors may apply for inclusion of the outsourced process within the scope of their SFI 2015-2019 Chain-of-Custody Standard certificate.~~

Organizations that wish to include outsourcing within the scope of their *SFI 2015-2019 Chain-of-Custody Standard* certificate shall ensure the following:

- a. the organization has legal ownership of all input material to be included in outsourced processes;
- b. the organization does not relinquish legal ownership of the materials during outsourced processing;
- c. the organization has an agreement or contract covering the outsourced process with each contractor. This agreement or contract shall include a clause reserving the right of the *SFI* accredited *certification body* to audit the outsourcing contractor or operation;
- d. the organization has a documented control system with explicit procedures for the outsourced process which are shared with the relevant contractor.

The organization shall issue the final claim statement and documentation for the processed or produced *SFI* certified material following outsourcing. The documentation shall state the certificate holder's *SFI 2015-2019 Chain-of-Custody Standard* certificate number and formal claim statement.

6.2 Assessing Risk for Outsource Contractors

As per the requirements of 5.6.6 outsourced activities shall be risk ranked in accordance with the following criteria:

~~6.2.1~~ Low Risk: outsource contractor receives the certified material from the organization and material is physically segregated from other non-certified material and contractor returns the material back to the organization after the outsourced work is completed.

~~6.2.2~~ High Risk: one or more of the following would indicate high-risk scenarios

- ~~The outsourced contractor lacks the procedures to prevent the mixing of the organization's certified material with that of other companies' materials that are unrelated to the outsourced process.~~
- ~~The outsource contractor receives certified material purchased by the organization for the process directly from the supplier on the organization's behalf and ships finished product to the end customer on the organizations behalf.~~

~~The outsource contractor applies the organization's SFI label to the finished product and ships the product direct to the customer.~~

~~96.3~~ Where the ~~certified organization~~ *SFI-certified organization* has outsourced activities within the scope of its ~~chain-of-custody~~ *Chain-of-Custody*, the ~~certified organization~~ *SFI-certified organization* shall develop procedures for the audit of these contractors.

~~96.4~~ The internal audit of outsource contractors may be conducted remotely.

~~96.5~~ Where there are sufficient outsource contractors the internal audit may use a sampling approach for these contractors.

~~9.6.6~~ The internal audit of outsource contractors shall:

- ~~determine the level of risk associated with the outsourced activities as determined by Part 9 — Outsourcing Agreements.~~
- ~~include within the scope of the internal audit those outsourced activities assessed as high risk.~~

Commented [SFI 63]: Replaced with new Outsourcing Requirements to align with PEFC.

Commented [SFI 64]: This clause deleted as the outsource contractor no longer has a level of risk associated with it. This aligns with the PEFC approach to outsourcing.

Appendix 1: Calculation of the Certification Percentage (Informative)

Definition of the *Product Group*

The organization shall identify *product group(s)* for which the certification percentage is calculated. The *product group* shall be identified for specific products or groups of products (e.g., paper). Only products that consist of the same or similar raw material can be included in one *product group*. SFI 2022 ~~Chain-of-Custody~~ *Chain-of-Custody Standard* at Part 3.2 and Appendix 1 allows an organization to define the *product group(s)* for which the certification percentage is calculated. The *product group* should be identified for specific products or groups of products. The organization should include in one *product group* only products which consist of the same raw material. For example, a printer could identify as a *product group* the paper usage for all inserts, order-forms, offset body, gravure body, and cover products being bound or stitched together into the final product of a magazine or catalog.

Other examples are listed in Table 1.

Table 1: Example of ~~chain-of-custody~~ *Chain-of-Custody* product group

| Output products | Input raw material | Chain-of-custody <i>Chain-of-Custody</i> product group | Units for credit account |
|-----------------------------|---------------------------------|---|--|
| Spruce lumber A | Spruce, Pine, Fir (SPF) sawlogs | Spruce, Pine, Fir (SPF) -products | Tons of Spruce, Pine, Fir (SPF) sawlogs |
| Pine lumber B | | | |
| Fir lumber C | | | |
| Fir/Spruce/Pine (SPF) chips | | | |
| Alder lumber A | Alder sawlogs | Alder products | Tons of Alder sawlogs |
| Alder lumber B | | | |
| Alder lumber C | | | |
| Alder chips | | | |
| Alder/Pine/Spruce sawdust | Alder/Spruce/Pine sawlogs | Residue products | Tons of Alder/Spruce, Pine Fir (SPF) sawlogs |
| Alder/Pine/Spruce bark | | | |

Calculation of the Certification Percentage

The company can use two methods to calculate the certification percentage (simple percentage or rolling *average* percentage):

Simple Percentage

The certification percentage for the specific *product group* is calculated from the material included in that specific *product group*. As a result, the organization applying this method must know the percentage of *certified content* before any product from that *product group* is sold or transferred.

Rolling Average Percentage

The rolling *average* percentage is obtained by using the quantity of raw material procured in the specified previous period. As a maximum, the rolling *average percentage* can be applied over the last 12 months.

Example of a Three-Month Rolling Percentage Average

The certification percentage for the *product group* is calculated from volumes of certified and other raw material procured during the previous three-month period (excluding the current *product group*).

Note: When the organization starts the *chain-of-custodyChain-of-Custody* and the time period used in rolling *percentage average* calculation is longer than the time period the *chain-of-custodyChain-of-Custody* has been in place, the calculation of the rolling *percentage average* is carried out from the volumes procured since the *chain-of-custodyChain-of-Custody* was established. An example is given in Table 2: The first rolling *percentage average* (month 1) is calculated only from volumes procured in month 1, the second rolling *percentage average* (month 2) is calculated only from volumes procured in months 1 and 2.

Table 2: Example of three-month rolling *percentageaverage calculation*

| 1 | 2 | 3 | 4 | 5 | 6 |
|---------------------------------------|---|--|---|---|--|
| No. of the 1-month calculation-period | Volume of certified raw material procured (tons) * | Volume of other raw material (tons) * | Sum of volumes of certified raw material for previous 3 months (tons) | Sum of volumes of other raw material for previous 3 months (tons) | 3-month rolling average percentage |
| j=i | V _c | V _o | V _{c(3)} | V _{o(3)} | P _{c(3)} |
| | | | $V_{c(3)} = \sum_{j=i}^{i-2} V_{C_i}$ | $V_{o(3)} = \sum_{j=i}^{i-2} V_{O_i}$ | $P_c = \frac{V_{c(3)}}{V_{c(3)} + V_{o(3)}}$ |
| 1 | 11 | 90 | 11 | 90 | 10.89% |
| 2 | 12 | 90 | 23 | 180 | 11.33% |
| 3 | 13 | 90 | 36 | 270 | 11.76% |
| 4 | 14 | 90 | 39 | 270 | 12.62% |

| | | | | | |
|-----------|----|----|----|-----|--------|
| 5 | 15 | 90 | 42 | 270 | 13.46% |
| 6 | 16 | 90 | 45 | 270 | 14.29% |
| 7 | 17 | 90 | 48 | 270 | 15.09% |
| 8 | 18 | 90 | 51 | 270 | 15.89% |
| 9 | 19 | 90 | 54 | 270 | 16.67% |
| 10 | 20 | 90 | 57 | 270 | 17.43% |
| 11 | 21 | 90 | 60 | 270 | 18.18% |
| Continues | | | | | |

* The volume figures given in the table above are only examples

Example of calculation given in Table 2:

- a. [column 4] Volume of certified raw material is calculated as sum of volumes of certified raw material procured in the previous 3 months.
 $Vc(3)_6 = Vc_6 + Vc_5 + Vc_4$; $Vc(3)_6 = 16 + 15 + 14 = \mathbf{45}$ [tons]
- b. [column 5] Volume of other raw material is calculated as sum of volumes of other raw material procured in the previous 3 months.
 $Vo(3)_6 = Vo_6 + Vo_5 + Vo_4$; $Vo(3)_6 = 90 + 90 + 90 = \mathbf{270}$ [tons]
- c. [column 6] The rolling ~~average~~ percentage is calculated according to the formula of chapter 3.3.1: $Pc = Vc / [Vc + Vo]$
 $Pc_6 = 100 * Vc(3)_6 / [Vc(3)_6 + Vo(3)_6]$; $Pc_6 = 100 * 45 / [45 + 270] = \mathbf{14.29\%}$

Note: The *product group* period does not need to be equal to the calculation period ~~as long as if~~ it does not exceed the length of the calculation period.

Volume-Credit Accumulation

The organization can establish a **volume** credit account for the input raw material used in the specific *product group* or for specific products of the *product group* if 3.54.2-4 applies.

Table 3: Example of **volume credit accumulation (in tons)**

| 1 | 2 | 3 | 4 | 5 |
|--|--|----------------|------------------------|--------------|
| Number of 1 month's <i>product group</i> | Credit volume for the <i>product group</i> | Credit account | Maximum credit account | Used credits |

| I | | $= [3]_{i-1} - [5]_{i-1} + [2]_i$ | $\sum_{i=1}^{i-1} [2]$ | |
|----|-------|-----------------------------------|------------------------|-----|
| | | condition: $[3]_i \leq [4]_i$ | | |
| 1 | 0 | 0 | 0 | 0 |
| 2 | 7.78 | 7.78 | 7.78 | 0 |
| 3 | 8.17 | 15.95 | 15.95 | 0 |
| 4 | 8.56 | 24.51 | 24.51 | 0 |
| 5 | 9.28 | 33.79 | 33.79 | 0 |
| 6 | 9.99 | 43.78 | 43.78 | 0 |
| 7 | 10.70 | 54.48 | 54.48 | 0 |
| 8 | 11.41 | 65.89 | 65.89 | 0 |
| 9 | 12.12 | 78.01 | 78.01 | 0 |
| 10 | 12.83 | 90.84 | 90.84 | 0 |
| 11 | 13.54 | 104.39 | 104.39 | 0 |
| 12 | 14.25 | 118.64 | 118.64 | 0 |
| 13 | 14.96 | 133.61 | 133.61 | 0 |
| 14 | 15.68 | 141.50 | 141.50 | 5 |
| 15 | 16.38 | 149.72 | 149.72 | 10 |
| 16 | 17.09 | 156.81 | 158.25 | 50 |
| 17 | 17.80 | 124.62 | 166.78 | 50 |
| 18 | 18.51 | 93.13 | 175.30 | 100 |

Example of calculation given in Table 3 for the *product group* of month 14:

- d. [column 2] Includes **volume**-credit calculated for 1 month *product group*. (Values for months 1-11 are taken from Table 2.)
- e. [column 3] Credit account is calculated as a result of the credit account in the previous month [column 3, month 14] minus **volume**-credits used in the previous month [column 5, month 14] plus **volume**-credit calculated for the current month [column 2, month 15].
 $[3]_{14} - [5]_{14} + [2]_{15} = 141.50 - 5 + 16.38 = 152.88$ **[tons]**

Total quantity accumulated in the credit account cannot exceed **volume** credits entered into the **volume**-credit in the previous **twelve-12** months [column 4 = 149.72] (chapter 3.4.2.4)

152.88 > 149.72, therefore credit account is **149.72 [tons]**

- f. [column 4] Maximum credit account is calculated as a sum of **volume** credits entered into the credit account during the last ~~twelve~~12 months [column 2, month 4-15].
- $$\begin{aligned}
 [4] &= [2]_4 + [2]_5 + [2]_6 + [2]_7 + [2]_8 + [2]_9 + [2]_{10} + [2]_{11} + [2]_{12} + \\
 & [2]_{13} + [2]_{14} + [2]_{15} = \\
 &= \\
 & 8.56+9.28+9.99+10.70+11.41+12.12+12.83+13.54+14.25+14.96+15.6 \\
 & 8+16.38 = \\
 & = \mathbf{149.72 [tons]}
 \end{aligned}$$

Use of the **Volume-Credit Account**

The **volume**-credit account shall be drawn down as certified sales are made. The number of **volume** credits removed from the account shall be based on the ratio of input/output volume for the specific products sold as certified. Table 4 shows an example of the drawdown of the **volume** credit account for different product sales.

Table 4: Example of drawdown of the **volume-credit account for different product sales**

| Credit account balance (raw material credits) | Product | Input/output ratio | Volume of certified sales | Reduction to credit account balance |
|---|---------|--------------------|---------------------------|-------------------------------------|
| 200 | A | 1/1 | 20 | 20 |
| 180 | B | 4/1 | 40 | 160 |
| 20 | C | 2/1 | 10 | 20 |
| 0 | - | - | - | - |

Appendix 2: ~~SFI Chain-of-Custody Certificate Requirements~~

~~(Informative) Certificate Statement: The X company or facility has been independently certified by Y, an SFI certification body accredited to perform SFI program audits that conform to the SFI 2015-2019 Chain-of-Custody Standard.~~

Commented [SFI 65]: Moved to Audit Procedures and Auditor Qualifications and Accreditation (Section 9) and provide guidance on FM and FS certificates.

~~2. Certificate Meaning: The certificate holder has been independently certified by an SFI certification body accredited to perform audits to the, SFI 2015-2019 Chain-of-Custody Standard, and has received a license from the SFI Office of Label Use and Licensing authorizing use of the SFI service marks.~~

~~2.1 Certificate Content: All SFI chain-of-custody certificates shall have the following information, at a minimum, on the certificate:~~

~~a. Chain of custody number: The numbering system will have a three letter abbreviation of the SFI certification body's name, followed by "SFI-COC," followed by the audit number.~~

The audit number can be unique to the *SFI certification body*. (Example for certification body XYZ completing its 20th chain of custody audit: XYZ-SFICOC-0020.)

b. The *SFI* off-product logo service mark (see below) must be placed on the certificate.



c. The logo of the accreditation firm (ANABSI or SCC) for the *SFI certification body* conducting the chain of custody certification must be placed on the certificate.

3. Eligible Entities: Any company or facility that manufactures or distributes forest-based manufactured or printed products and wants to document that the material in the products was manufactured by a company certified to the *SFI 2015-2019 Chain of Custody Standard* is eligible to obtain an *SFI 2015-2019 Chain of Custody Standard* certificate (except as provided for in the *SFI Policy on Illegal Logging* in Section 7 of the *SFI* requirements document).

4. Application for *SFI* Label Use: The certified company and/or the *SFI certification body* will inform the *Office of Label Use and Licensing* of a successful completion along with a copy of the chain of custody certificate.

5. Issuance of License and Certificate

5.1. Issuance of License. The *Office of Label Use and Licensing* shall issue the license to use the *SFI* off-product marks to the applicant upon written confirmation of successful completion of the chain of custody audit.

5.2. Certificate. The *SFI certification body* provides the written documentation of a successful completion of an audit.

6. Availability of On-Product Label: Holders of *SFI 2015-2019 Chain of Custody Standard* certificates may also qualify for use of an *SFI* on-product label and may receive authorization from the *SFI Office of Label Use and Licensing*.

Appendix 23: Criteria for the Evaluation of Chain-of-Custody Certification Standards for Use in the *SFI* Program

Objective

This appendix is intended to evaluate whether or not the chain-of-custody standards have credible systems for tracking wood flows from *SFI*-certified land-bases. The intent is not to recognize or include other provisions on “controlled wood,” “good wood” or any other forest management provisions.

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Criteria

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1. The standard contains elements which address scope, references and definitions.

Commented [SFI66]: This is covered by the term, “other credible Chain-of-Custody standards” defined in SFI Section 14 – Definitions.

2. ~~The standard defines minimum requirements for the management system, including:~~
3. ~~The standard contains specific requirements for each chain of custody method allowed under the standard (physical separation, percentage-based, volume credit, batch in/batch out, procurement system), including but not limited to:~~
 - ~~supplier identification/verification or *origin* of wood flows;~~
 - ~~inventory control and accounting of wood flows;~~
 - ~~separation of material (if necessary); and~~
 - ~~calculation of the certified percentage.~~
4. ~~The standard is consistent with the requirements of national and international standards and conformity assessment forums such as International Organization of Standardization (ISO) or the International Accreditation Forum.~~
5. ~~The standard requires the use of *certification bodies* accredited by ANABSI, Standards Council of Canada, or an equivalent body recognized by the International Accreditation Forum to conduct a Chain of Custody (CoC) Conformity Assessment based on ISO/IEC Guide 65:1996 or ISO/IEC 17065:2012.~~