

UK Government Timber Procurement Policy

Criteria for Assessing Certification Schemes (First Edition)

Assessment of the Sustainable Forestry Initiative (SFI)

18th October 2004

Source documents

2002-2004 Edition Sustainable Forestry Initiative (SFI) Program

- SFI Program Overview
- SFI Standard (SFIS)
- SFI Verification/Certification Principles and Procedures (SFI-V-CPP)
- SFI Qualification Criteria for Verifiers

SFI Program On-Product Label Use Requirements (April 2003)

AF&PA Guidance Document on Wood Flow Accounting & Legality (May 2003) Wood Flow Accounting (Chain-of-Custody) Required Under the SFI

SFI Standard and Audit Documents DRAFT 2:2005-2009 SFIS

Forests With Exceptional Conservation Value Enhancements & Guidance (July 2002)

Draft 3: 2005-2009 SFI Program: Overview, Governance, Guidance and Historical Information

DRAFT 2: 2005-2009 SFI Audit Procedures and Qualifications

Crosswalk Template for the SFI Program Standard Review Version for SFIS – DRAFT (Pinchot Institute 2004)

Comparing Certification Systems and the Montreal Process Criteria & Indicators (Pinchot Institute 2001)

Bylaws of the Sustainable Forestry Board Inc, July 9 2004

1. Forest Standards

1.1. Content of standards for legal compliance

Criteria	Findings	Score	L¹	S
1.1.1 The standard requires that the forest owner/manager holds legal	Fully addressed - not explicitly detailed in Principles, Objectives or Performance Measures but implicit in introductory text to	2	✓	

¹ L: required to meet requirements for legal, S: required to meet requirements for sustainable variant

Criteria	Findings	Score	L ¹	S
use rights to the forest	SFIS Section 3 Principles for Sustainable Forestry. Only for use in north America where there is a mature and functioning legislative system and existing administrative structures.			
1.1.2 The standard requires compliance from both the forest management organisation and any contractors with local and national laws and codes of practice including those relevant to: <ul style="list-style-type: none"> • Forest management • Environment • Labour and welfare • Health & safety 	Fully addressed - SFIS 3 Principles for Sustainable Forestry 3.5 Legal Compliance – <i>To comply with applicable federal, state or local forestry and related environmental laws and regulations.</i> Noted ‘forestry and related’ scope but taken to cover all legislation relevant to SFI Participants’ activities. Included in introductory text - SFI Participants must comply with federal, state and local regulations and acknowledges external mechanisms that ensure conformance.	2	✓	
1.1.3 The standard requires payment of all relevant royalties and taxes	Fully addressed - not explicitly stated but implicit in compliance with laws and regulations within the context of north American legislative system and existing administrative structures.	2	✓	
1.1.4 The standard requires compliance with the requirements of CITES.	Fully addressed - not explicitly stated but implicit in compliance with laws and regulations within the context of north American legislative system and existing administrative structures. US and Canada CITIES signatories since 1974 and 1975 respectively.	2	✓	

1.2. Content of standards for sustainable variant

Criteria	Findings	Score	L	S
1.2.1 Certification standards must be based on a widely accepted set of international principles and criteria defining sustainable or responsible forest management at the forest management unit level, such as: <ul style="list-style-type: none"> • Intergovernmental 	The SFI Overview document Section 2 History of the SFI Program notes that standard development was initiated in 1990 when the American Forest Council convened a process which resulted in the 1992 10 Forest Management Principles. In 1994, the American Forest & Paper Association (AF&PA) process led to the creation of the original SFI Principles and Implementation Guidelines. There is no international interpretation of the	1		✓

Criteria	Findings	Score	L	S
<p>processes designed for use at FMU level</p> <ul style="list-style-type: none"> • ITTO Criteria • FSC P&C 	<p>Montreal process requirements for use at the FMU level in the US. Although not based specifically on the Montreal C&I Draft 3: 2005-2009 SFI Program: Overview, Governance, Guidance and Historical Information notes that the development and improvements were '<i>significantly influenced by the emerging processes to define international principles and criteria for forest conservation and sustainable development such as the Montreal Process that began in 1993</i>'.</p> <p>There is also increasing convergence between the SFIS and Montreal C&I as seen in the Pinchot Institute comparison of 2001 and more recently in the <i>Crosswalk Template</i> and the draft 2005-2009 SFIS.</p>			
1.2.2 The standard should be performance-based.	Fully addressed - SFIS includes a range of performance based criteria.	2		✓
<p>1.2.3 The standard must ensure that harm to ecosystems is minimised. In order to do this the standard should include requirements for:</p> <ul style="list-style-type: none"> i. Appropriate assessment of impacts and planning to minimise impacts; ii. Protection of soil, water and biodiversity; iii. Controlled and appropriate use of chemicals and use of Integrated Pest Management wherever possible. iv. Proper disposal of wastes to minimise any negative impacts. 	<p>i) SFIS Principle 3.1 Sustainable Forestry – includes conservation of soil, air and water quality. Principle 3.2 Responsible Practices – includes sustainable forestry practices that are environmentally responsible.</p> <p>4.1.1.1 Core SFI indicator #2 long-term resource analysis to guide forest management planning. Other indicators #2 – training programmes to address significant impacts. Assessment of impacts included as training programmes, but not specifically included in the management planning core indicator.</p> <p>The Draft 2005-2009 SFIS includes issue-specific requirements on assessment of impacts such as 4.1.5 (representation of cover types and habitat) and 5.1 (manage impact of harvesting on visual quality) – the revised SFIS should be re-assessed for appropriate coverage.</p> <p>ii) Adequately addressed - 4.1.3 Objective 3 Protect the water quality in stream, lakes and other water bodies. 4.1.2.1.4 - management practices to protect and maintain forest and soil productivity. 4.1.4 Objective 4 - manage the quality and distribution of wildlife habitats and contribute to the conservation of biological diversity by developing and implementing standlevel and landscape level</p>	1		✓

Criteria	Findings	Score	L	S
	<p>measures that promote habitat diversity and the conservation of forest plants and animals including aquatic fauna. SFIS Principle 3.1 Sustainable Forestry. Principle 3.2 Responsible Practices.</p> <p>iii) Adequately addressed - 4.1.2.1.3 - minimise chemical use required to achieve management objectives. Core SFI Indicator #4 calls for IPM where feasible</p> <p>iv) Adequately addressed - Waste disposal not specified in SFIS but included in compliance with laws and regulations within the context of north American legislative system and existing administrative structures.</p>			
<p>1.2.4 The standard must ensure that productivity of the forest is maintained. In order to do this the standard should include requirements for:</p> <ul style="list-style-type: none"> i. Management planning and implementation of management activities to avoid significant negative impacts on forest productivity. ii. Monitoring which is adequate to check compliance with all requirements, together with review and feedback into planning. iii. Operations and operational procedures which minimise impacts on the range of forest resources and services. iv. Adequate training of all personnel, both employees 	<p>i) Adequately addressed - SFIS Principle 3.1 Sustainable Forestry - requirement to practice sustainable forestry. SFIS Principle 3.2 Responsible Practices - use environmentally, economically and socially responsible practices. SFIS Principle 3.3 Forest Health and Productivity - protect forest from damaging agents to maintain and improve long-term health and productivity. 4.1.2 Objective 2 - ensure long-term forest productivity and conservation.</p> <p>4.1.1.1.1 - policies to implement and achieve SFIS Principles and Objectives Core SFI Indicators #1 written policies for achieving SFIS and #2 long-term analysis to guide forest management planning.</p> <p>ii) Adequately addressed - 4.4.1 Objective 11- requirement to promote continual improvement in the practice of sustainable forestry and monitor, measure and report performance in achieving the commitment to sustainable forestry. 4.4.1.1.1 - establish a management review system to examine findings and progress in implementing the SFI Program and policies.</p> <p>iii) Adequately addressed - 4.1.2.1.4 - requirement to implement management practices to protect and maintain forest and soil productivity. 4.1.5 Objective 5 - manage the visual impact of harvesting and other forest operations.</p> <p>iv) Adequately addressed - 4.1.3.1.4 - BMP</p>	2		✓

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Criteria	Findings	Score	L	S
<p>and contractors.</p> <p>v. Harvest levels that do not exceed the long-term production capacity of the forest, based on adequate inventory and growth and yield data.</p>	<p>training for employees in forest management.</p> <p>v) Adequately addressed - 4.1.1.1.4 - requirement to ensure long-term harvesting levels are sustainable and consistent with appropriate growth and yield models and written plans.</p>			
<p>1.2.5 The standard must ensure that forest ecosystem health and vitality is maintained. In order to do this the standard should include requirements for:</p> <p>i. Management planning which aims to maintain or increase the health and vitality of forest ecosystems</p> <p>ii. Management of natural processes, fires, pests and diseases.</p> <p>iii. Adequate protection of the forest from unauthorised activities such as illegal logging, mining and encroachment.</p>	<p>i) Adequately addressed - forest health covered in a number of performance measures and indicators. Forest ecosystem vitality has limited specific coverage, but can be inferred from other requirements. 4.1.2 Objective 2 - ensure long term forest productivity and conservation of forest resources. 4.2.4.1.3 - manage wildlife habitat and contribute to conservation of biological diversity.</p> <p>ii) Adequately addressed - Principle 3.3 Forest Health and Productivity - requires protection from damaging agents to maintain and improve long-term health and productivity. 4.1.2.1.5 - protect forests from damaging agents to maintain and improve forest health, productivity and economic viability.</p> <p>iii) Adequately addressed - protection from unauthorised activities seen as included in SFIS Principle 3.5 Legal Compliance within the context of north American legislative system and existing administrative structures.</p>	2		✓
<p>1.2.6 The standard must ensure that biodiversity is maintained. In order to do this the standard should include requirements for:</p> <p>i. Implementation of safeguards to protect rare, threatened and endangered</p>	<p>i) Adequately addressed - Section 1B of the SFIS - Forests With Exceptional Conservation Value (FECV) and Forests With Exceptional Conservation Value Enhancements & Guidance includes requirements for protection of forests with exceptional conservation value and protect species and communities that are identified as critically imperiled or imperiled.</p> <p>4.1.4 Objective 4 - manage the quality and distribution of wildlife habitats and contribute</p>	2		✓

Criteria	Findings	Score	L	S
<p>species.</p> <p>ii. The conservation/set-aside of key ecosystems or habitats in their natural state.</p> <p>iii. The protection of features and species of outstanding or exceptional value.</p>	<p>to the conservation of biological diversity.</p> <p>ii) Adequately addressed - 4.1.4.1.3 – manage wildlife habitat and contribute to conservation of biological diversity. 4.1.6.1.1 - requires development, support of or participation in plans or programmes for conserving old growth and other native forests (but does not specify in natural state).</p> <p>iii) Adequately addressed - FECV requirements (as noted above). SFIS Principle 3.4 Protecting Special Sites – managing forests and lands of special significance in a manner that takes into account their unique qualities. 4.1.6 Objective 6 – manage lands of ecologic, geologic, cultural or historic significance in a manner that recognises their special qualities.</p>			

1.3. Standard-setting process

Criteria	Findings	Score	L	S
<p>1.3.1 The standard-setting process should meet the requirements of <i>ISO Guide 59: Code of Good Practice for Standardisation</i>, the <i>ISEAL Code of Good Practice for Setting Social and Environmental Standards</i> or equivalent.</p>	<p>Compliance with ISO Guide 59 or ISEAL Code is not specifically required.</p> <p>Although the AF&PA is an ANSI accredited standards development organisation – this accreditation covers:</p> <ul style="list-style-type: none"> • The development and maintenance of guidelines and requirements for structural design of lumber and lumber products, and their connectors. • The development and maintenance of wood design standards including the design of wood members and their connectors <p>However, the requirements set out in SFI Program Overview and SFI Standard documents, though less detailed than ISO Guide 59, are broadly compatible.</p>	<ul style="list-style-type: none"> • 2 	✓	✓
<p>1.3.2 The standard-setting body must include balanced representation of economic, environmental and social interest categories.</p>	<p>The SFI Program was originally an initiative of US forest products companies through the AF&PA and its predecessor organizations. Other groups involved in development of the programme included private non-industrial forest landowners, loggers, foresters, federal and state natural resource agencies, and environmental and</p>	2		✓

Criteria	Findings	Score	L	S
	<p>other NGOs.</p> <p>In 1995 establishment of the External Review Panel (ERP), formalized stakeholder involvement and included eighteen natural resources professionals from government agencies, conservation groups and academic institutions provided their review to the SFI program.</p> <p>In 2000 the Sustainable Forestry Board (SFB) was established with responsibility for the SFIS. The SFB Bylaws note that the SFB is comprised of 15 members within three membership sectors made up of:</p> <ul style="list-style-type: none"> • 5 from the forest, paper and wood products industry all members of AF&PA • 5 from nonprofit environmental/conservation organisations • 5 from other stakeholder groups including but not limited to county, state and federal agencies, logging professionals and organised labour, scientific and academic groups, forest product consumers and non-industrial forest landowners. 			
<p>1.3.3 The decision-making process adopted by the standard-setting body should ensure:</p> <ul style="list-style-type: none"> • no individual person or organisation can veto the process; • no single interest can dominate the process; • no decision can be made in the absence of agreement from the majority of an interest category. 	<p>Decision making within the SFB is detailed within the SFB Bylaws Article, I Item 5 Voting - <i>'Except where provided otherwise by law or by these Bylaws, it shall take a minimum of eighty percent (80%) of those present which must include at least two representatives of each membership sector to approve any action of the Board'</i></p> <p>This ensures that no individual organisation or person can veto the process and no single interest can dominate the process. However, these rules do allow the potential for decisions to be made without the majority agreement from all membership sectors.</p>	1		✓

2. Certification

Criteria	Findings	Score	L	S
<p>2.1 Certification is undertaken by an individual or body whose organisation, systems and procedures conform to appropriate ISO guidance, or publicly available equivalent. ISO guidance includes:</p> <p>iv. ISO Guide 62:1996 General requirements for bodies operating assessment and certification/registration of quality systems</p> <p>v. ISO Guide 65: 1996 General Requirements for bodies operating product certification systems</p> <p>vi. ISO Guide 66: 1999 General requirements for bodies operating assessment and certification/registration of environmental management systems (EMS) or equivalent.</p>	<p>SFI-V/_CPP Section 5.4 Approval of Verifiers to Conduct SFI Certifications notes that SFI verification can be carried out by firms or individual lead auditors.</p> <p>SFI-V/_CPP Section 5.4 Approval of Verifiers to Conduct SFI Certifications – requires all firms or lead auditors to operate in accordance with the ISO series of standards for environmental auditing (14010, 14011, 14012) or equivalent.</p> <p>SFI Qualification Criteria for Verifiers (SFI-QCV) Section 4 Education Training and Formal Experience notes – to conduct third party verification the lead verifier to be a registered EMS lead auditor and the lead verifier’s organization or firm may also be appropriately accredited to conduct ISO 14001 certification.</p> <p>Nationally accredited certification bodies (for ISO 14001 certification) will have had their organisation, systems and procedures checked for compliance against ISO Guide 66 by the national accreditation body (ANSI-RAB NAP or SCC). However SFI verifier companies need not be accredited and therefore not assessed for compliance with ISO Guidance 66 or equivalent.</p> <p>Individual EMS Lead auditors, although registered by a national accreditation body against ISO 14010 and 14011 will not have had a full compliance check with the requirements for running a certification/registration system in ISO Guide 66.</p> <p>DRAFT 2005-2009 SFI Audit Procedures and Qualifications (APQ) Section 7.4 Education, work experience, auditor training, and audit training and experience – will eliminate the use of individual auditors by requiring the lead auditor’s organisation or firm to be appropriately accredited to conduct ISO 14001 certification/registration by ANSI/RAB or equivalent. The revised APQ should be reviewed once finalised.</p>	1	✓	✓

Criteria	Findings	Score	L	S
<p>2.2 Certification is undertaken by an individual or body which is accredited to evaluate against forest management standards.</p>	<p>Adequately addressed - accreditation within the SFI Program carried out at two levels:</p> <ul style="list-style-type: none"> • Compulsory national accreditation of EMS Lead auditors by RAB or CEAA, and discretionary national accreditation of certification bodies for 14001 certification by ANSI-RAB NAP or SCC • Compulsory approval by SFB Verifiers Accreditation Subcommittee of all verifiers (individuals or organisation) for carrying out verification against the SFIS. <p>SFI-V/CPP Section 5.4 Approval of Verifiers to Conduct SFI Certifications - SFB Verifiers Accreditation Subcommittee approves verifiers to conduct certifications. Prospective SFI certifiers are required to provide copies of all required accreditation, training credentials and relevant work experience to the SFB Verifiers Accreditation Subcommittee. SFI website maintains a list of SFI third-party auditors. The Sustainable Forestry Initiative Qualification Criteria for Verifiers (SFI-QCV) Section 4 Education, Formal Training and Experience requires:</p> <ul style="list-style-type: none"> • Lead verifiers to be certified as an EMS Lead Auditor by national accreditation body (RAB or CEAA). • The Lead verifier's organisation <u>may</u> also be appropriately accredited to conduct ISO 14001 certification (ANSI-RAB NAP or SCC). • Minimum technical education/training and relevant work experience for verifiers and Lead verifiers. <p>DRAFT 2005-2009 SFI Audit Procedures and Qualifications (APQ) Section 7.4 Education, work experience, auditor training, and audit training and experience - will eliminate the use of individual auditors by requiring the lead auditor's organisation or firm to be appropriately accredited to conduct ISO 14001 certification/registration by ANSI/RAB or equivalent.</p>	2	✓	✓
<p>2.3 The certification audit must include assessment of systems and</p>	<p>Adequately addressed - SFI-V/CPP Section 6 Verification Procedures and Section 7 Verification contain details of how SFI</p>	2	✓	✓

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documentation together with verification of outcomes in the forest adequate to ensure that both system and performance requirements in the standard are being met.	certification is to be carried out. Section 6.1 Verification Objectives - notes that verification shall establish whether management system and on-the-ground activities meet the requirements of the SFIS. Section 7.6 Collection of Verification Evidence - notes that evidence should be compiled by examining procedures and documents etc, field performance and meetings with people and organisations. The section requires sampling and measurement procedures to be of 'highest quality'.			
2.4 The certification audit must include sufficient consultation with external stakeholders to ensure that all relevant issues are identified relating to compliance with the requirements of the standard.	Section 7.6 Collection of Verification Evidence - <i>'evidence should be compiled...through meetings with employees, contractors and other third parties (e.g., government agencies, community groups, conservation organisations), as appropriate, to determine conformance to the Standard'</i> .	2		✓
2.5 A summary of the results of the certification audit (excluding confidential information) is publicly available to interested parties.	Adequately addressed - SFI Overview Section 4 Reporting and Transparency – certified Program Participants must provide a public summary of their findings to interested parties. 4.3.1 Objective 9 requires public reporting of Program Participants' progress in fulfilling their commitment to sustainable forestry. SFI-V-CPP Section 5.10 Verification Report – requires the Program participant to work with the verifying organisation to prepare an audit summary for public disclosure.	2		✓
2.6 There is an accessible and functioning mechanism for dealing with complaints and disputes which is open to any interested party.	Adequately addressed - SFI-V-CPP Section 8 Interpretation, Feedback and Disputes/Appeals – this process is open to any person with information or claims about practices of a Program Participant. The first stage is for a complaint to be made in writing to Program Participant, who must respond within 45 days. Unresolved issues are to be forwarded to the State Implementation Committee Inconsistent Practices Program (SIC established in 38 States and 5 Canadian Provinces), or if an SIC is not in existence to the SFI National Inconsistent Practices office via the External Review Panel	2	✓	✓

Criteria	Findings	Score	L	S
	<p>Secretariat.</p> <p>Disputes over entire certifications follow the same initial step and if unresolved are referred to the SFB Executive Director for consideration by the SFB Certification Appeals Subcommittee.</p>			

3. Accreditation

Criteria	Findings	Score	L	S
<p>3.1 Accreditation must be undertaken by a national or international body whose organisation, systems and procedures conform to ISO Guide 61: 1996 General Requirements for Assessment and Accreditation of Certification Bodies or equivalent.</p>	<p>The SFI Program effectively incorporates a two level accreditation process – national accreditation of verifying organisations and Lead verifiers for EMS auditing; and accreditation by the SFB Verifiers Accreditation Subcommittee for SFI-specific verification.</p> <p>As detailed in 2.1 and 2.2 certification may be carried out by verifiers who can be individuals or organisations. All verifiers are required by SFI-V/ CPP Section 5.4 to comply with ISO environmental auditing standards or equivalent, but organisations need not be accredited for ISO 14000 certification. Lead verifiers must be EMS Lead auditors registered by a national accreditation body such as RAB in the US and CEAA in Canada.</p> <p>Therefore all individual Lead verifiers will have been registered by a national accreditation body, however verifying organisations may not.</p> <p>The US (ANSI-RAB NAP) and Canadian (SCC) accreditation bodies are IAF members and Multilateral Recognition Arrangement (MLA) Signatories for Quality Management Systems and therefore have had peer evaluation of their compliance with international and IAF requirements.</p> <p>DRAFT 2005-2009 SFI Audit Procedures and Qualifications (APQ) Section 7.4 Education, work experience, auditor training, and audit training and experience – will eliminate the use of individual auditors by requiring the lead auditor’s organisation or firm to be appropriately accredited to conduct ISO 14001 certification/registration by ANSI/RAB or equivalent. The revised APQ should be reviewed once finalised.</p>	1	✓	✓

4. Chain of custody

4.1. Criteria relating to all products

Criteria	Findings	Score	L	S
4.1.1 Assessment of chain of custody must be undertaken by a certification body or auditor operating in accordance with ISO Guide 65 or equivalent and accredited by an accreditation body operating in accordance with ISO Guide 61 or equivalent.	<p>As detailed in 2.1, 2.2 and 3.1. Accreditation is carried out at two levels by national accreditation bodies (for EMS certification); and accreditation by SFB Verifiers Accreditation Subcommittee for verification against SFIS.</p> <p>Nationally accredited certification bodies will meet ISO Guide 65 or equivalent, registered EMS Lead auditors will not have been assessed against ISO 62, 65 or 66.</p> <p>National accreditation bodies, ANSI-RAB NAP in US and SCC in Canada, are members of IAF and Multilateral Recognitive Arrangement (MLA) Signatories for Quality Management Systems since 1998 and therefore have their compliance with ISO Guide 61 assessed through peer review as part of the MLA process.</p> <p>SFB Verifiers Accreditation Subcommittee compliance with ISO Guide 61 – see 3.1.</p> <p>DRAFT 2005-2009 SFI Audit Procedures and Qualifications (APQ) Section 7.4 Education, work experience, auditor training, and audit training and experience – will eliminate the use of individual auditors by requiring the lead auditor’s organisation or firm to be appropriately accredited to conduct ISO 14001 certification/registration by ANSI/RAB or equivalent. The revised APQ should be reviewed once finalised.</p>	1	✓	✓
4.1.2 There must be a certified chain of custody in place from the forest of origin to the final product.	<p>Requirements for chain of custody are detailed in SFIS and SFI Program On-Product Label Use Requirements.</p> <p>The SFI approach is distinct from other forest certification systems. The SFI Program has a procurement system or wood flow approach based on Program Participants rather than a chain of custody based approach. This does not include provision to differentiate between products sourced from specific certified forests and products containing material from mixed</p>	1	✓	✓

Criteria	Findings	Score	L	S
	certified and non-certified sources. All SFI material must therefore be recognised as a mixed certified and non-certified product.			
4.1.3 There is a clearly defined mechanism for controlling all claims made about the certified nature of products which ensures that claims are clear and accurate and that action is taken to prevent any false or misleading claims.	Adequately addressed - defined in SFI Program On-Product Label Use Requirements Section 6 Process for Label Use – Primary and Secondary Producers. Label rules and procedures have been developed by the Office of Label Use and Licensing.	2	✓	✓

4.2. Criteria for certified and non-certified mixed products

Criteria	Findings	Score	L	S
4.2.1 If recycled material is used there must be a verifiable system in place to ensure that recycled material is from the following categories: <ul style="list-style-type: none"> • Pre-consumer recycled wood and wood fibre or industrial by-products but excluding sawmill co-products • Post-consumer recycled wood and wood fibre • Drift wood 	Adequately addressed - recycled material is covered in SFI Program On-Product Label Use Requirements Section 3.6 Neutral Sources. Neutral sources: Recovered wood fibre and recovered paper and sawdust or dry shavings produced as a by-product of a primary or secondary manufacturing process. 3.6.1.1 Recovered Paper is paper and paper byproducts that have been separated, removed or diverted from solid waste and are intended for sale, use, reuse or recycling, excluding the virgin content of mill broke.	2		
4.2.2 If mixing of certified and uncertified material is permitted then there must be a verifiable system in place which ensures that all uncertified material used is from legal sources to meet the contract requirements for legal timber.	All SFI certified material is potentially a mixed certified and non-certified product as the SFI Program defines independently third party certified sources as including material that is sourced from specific forest areas managed in accordance with SFIS (or other acceptable standards – only the ATFS) confirmed through independent third party verification, or through a procurement system certified to be in compliance with the SFIS. This can include from north American forests	2	✓	

Criteria	Findings	Score	L	S
	<p>not SFI or ATFS certified and other credible sources (sources outside the U.S. or Canada) that are harvested:</p> <ul style="list-style-type: none"> • In compliance with generally accepted sustainable forestry practices • In a manner that does not constitute illegal logging practices as defined in section 5.32 of the SFI Standard. <p>The Program includes the following to avoid illegal sources:</p> <ul style="list-style-type: none"> • SFIS 4.2.1.1.7 requires Program Participants to define and implement policies which ensure procurement practices do not compromise SFIS Principles. • SFIS 4.2.1.1.8 – requires procurement practice which contributes to elimination of illegal logging. • Sections 4.4.3 and 5.3.2.6 of the On-Product Label Use Requirements notes that inclusion of non-acceptable sources would preclude approval for label use. (Non-acceptable sources are those not meeting the requirements for independently third-party certified, neutral, conversion, agricultural or other credible sources). 			
<p>4.2.3 If mixing of certified and uncertified material is permitted then there must be a system in place which ensures that all uncertified material used is from sustainable sources to meet the variant specification requirements for sustainable timber.</p>	<p>There is no requirement for a verifiable system to ensure that the forests of origin of all uncertified material meet the requirements of clauses 2.1.3 - 2.1.6.</p>	0		✓