

cpet

Central Point of Expertise on Timber

Evaluation of Category A Evidence

Obsolète

Assessment Results **Sustainable Forestry Initiative**

September 2005

SFI 2005

This document is provided for historical reference. A more recent report is now available

Executive Summary

Date of Current Assessment: September 2005

Date of Previous Assessment: November 2004

Anticipated Date of Next Assessment: 2006

Current Status

Meets requirements for legality.

Meets requirements for sustainability, provided products contain 70% or more material from certified forests (must follow CoC system).

Changes from last assessment

Now meets requirements for sustainability.

Obsolete

1. Introduction

The UK Government's procurement policy on timber and timber products was announced in July 2000¹. This policy requires all Government departments and their agencies to actively seek to buy timber products from legal and sustainable sources. In 2003 the Government issued a model contract specification for the supply of timber and timber products that required timber to come from legal sources. The model contract also included a variant specification for timber from sustainable sources.

A key requirement of the contract and variant specification is that suppliers must be able to provide evidence to the Government that the wood or wood products they supply are from legal and, if promised by the supplier, sustainable sources. A number of ways were identified for achieving this. One of the most straightforward is to supply products from certified sources², provided that the certification scheme involved delivers the Government's requirements for legality or sustainability. As there are a number of different timber certification schemes available, the Government recognised that it needed a framework for assessing which ones deliver its timber policy, incorporating the requirements contained in the new contract and variant specifications.

Therefore, a study was carried out through the Central Point of Expertise in Timber (CPET) to review the contract and variant specifications and to assess the five certification schemes identified by procurement staff as the most commonly encountered in the UK wood supply chain to establish which of them deliver UK Government requirements for legal and sustainable timber. These five schemes were:

- The Canadian Standards Association scheme (CSA), which is applicable in Canada.
- The Forest Stewardship Council system (FSC), which is international in scope.
- The Malaysian Timber Certification Council scheme (MTCC), which is applicable in Malaysia.
- The Programme for the Endorsement of Forest Certification schemes (PEFC), which is international in scope.
- The Sustainable Forestry Initiative (SFI), which is applicable in the US and Canada.

The results of this study were released through the report *Assessment of Five Forest Certification Schemes, CPET Phase 1 Final Report*, in November 2004. This announced that of the five forest certification schemes assessed against Government contract requirements only two (FSC and CSA) gave assurance of legal and sustainable timber sources. The other three (PEFC, SFI and MTCC) assured legal sources.

¹ http://www.press.dtlr.gov.uk/pns/DisplayPN.cgi?pn_id=2000_0516

² It is important to note that the UK Government has no intention of requiring suppliers to supply only certified products. It is simply one of the ways in which evidence of legality or sustainability can be delivered. Any other adequate form of evidence will be equally acceptable.

Following changes to the SFI certification scheme, in April 2005, the SFI Board requested that the scheme should be submitted for re-assessment against the UK Government requirements.

This report details the results of a re-assessment carried out by CPET.

2. The methodology for assessing schemes

2.1 Methodology

The assessment was carried out against the criteria set out in *UK Government Timber Procurement Policy: Criteria for Assessing Certification Schemes, 15 September 2004*.

The assessment was made based on publicly available documentation from the scheme. For each criterion, relevant scheme requirements were identified together with a note of whether these constituted inadequate, partial or full compliance with the criterion. The assessment focussed on changes made to the scheme subsequent to, and in response to, the initial assessment in November 2004.

The draft assessment findings were then sent to the scheme with an invitation to review the findings and, wherever appropriate, to provide further information or comment on the draft findings.

Comments, together with additional information, was submitted by the scheme and discussions were held to clarify particular issues. The draft assessment findings were reviewed on the basis of this additional input and proposed changes to the re-assessment findings were drafted. These proposed changes, together with all of the comments submitted by the scheme, were sent for internal Government review. Based on all the input received from this process, the findings were then finalised, and submitted to DEFRA. Following acceptance by DEFRA, the completed re-assessment findings were sent to the scheme.

2.1.1 Information sources

As discussed above, the assessment for each scheme was carried out based on publicly available documentation from the scheme, together with direct discussions with some scheme personnel. ***No assessment of the actual outcome of certification in the forest was made***, as this was not part of the terms of reference for the assessment. Details on the sources are available in Appendix 1.

2.1.2 Scoring system used

For each scheme compliance with the requirements of each criterion was scored on a 3-point scale:

0: Inadequately addressed and not acceptable.

1: Partially addressed.

2: Fully addressed.

As a result of having only three possible scores, the score of 1 applied to a wide range of situations, but this was considered a better option than trying to divide partial compliance into a number of different levels which carries a significant risk of becoming subjective.

To achieve recognition as delivering requirements for legality the scheme must achieve a score of at least 1 for each criterion applicable to legality.

To achieve recognition as delivering requirements for sustainability the scheme must achieve a score of at least 1 for each criterion applicable to sustainability as well as an overall score equal to 75% of the total possible.

Therefore, a score of zero for any criterion prevents a scheme from being recognised for the category.

2.1.3 Addressing products containing certified and uncertified material

All of the certification schemes examined allow mixing of certified and uncertified raw material in certified products. As a result, two types of certified product exist:

- 100% certified products: these products contain only material which originated in certified forests. For these products it is only necessary to assess the control of certified material.
- Mixed source products: these products contain material from a range of sources including certified forests, uncertified forests and recycled. Therefore, it is necessary to assess the control not only of certified material, but also of uncertified and recycled material to establish whether it meets the contract conditions and variant specification.

Therefore, although the bulk of the analysis deals with the control of certified material, it is also necessary to decide what is adequate control of the uncertified material in a mixed source product. This was determined as follows:

Legal compliance: the requirements of the certification scheme must be adequate to ensure that there is a verifiable system in place to check that all uncertified material is from a legal source. It is recognised that this is less rigorous than the requirements for the certified material and provides less of a guarantee that the material is from a legal source. However, it was considered that this was adequate to demonstrate due diligence provided the certification schemes included mechanisms to enforce the requirement.

Sustainable: the Government variant specifications and the criteria used to assess schemes set out rigorous requirements which must be met in the forest in order to ensure that forest management is sustainable. Therefore, if uncertified material is to be considered as coming from sustainable sources, it is necessary to have in place a system which ensures similarly rigorous requirements are met for the uncertified material. In practice, such requirements exist only for certified material and currently are not met by any scheme for uncertified raw material.

1. Results

The full findings, scores and results for the SFI assessment can be found in Appendix 1.

1.1. Legal

The assessment indicated that the SFI scheme is adequate to ensure that certified forests meet UK Government requirements for legal timber. In addition, the requirements for control of uncertified material in mixed source products are adequate to deliver legality. Therefore, all SFI-certified products deliver UK Government requirements for legality.

1.2. Sustainable

The assessment indicated that the SFI scheme is adequate to ensure that certified forests meet UK Government requirements for sustainable timber, subject to the following note on chain of custody:

- SFI allows the use of two approaches to product traceability wood flow accounting and chain of custody. The wood flow accounting approach does not provide information on the proportion of material from SFI certified forests and is not acceptable.
- Only products produced in accordance with the voluntary chain of custody approach as set out in Section 12.1 *X Percent Content Label* and Section 12.2 *100% Content Label* of the SFI On-Product Label Use Requirements, which can identify the percentage of certified material from forests independently certified to the SFI Standard meet the UK Government requirements for sustainability. In common with all schemes, uncertified material cannot be guaranteed as coming from sustainable sources. Therefore, SFI-certified products containing 70% or more material from certified forests deliver UK Government requirements for sustainability.

Appendix 1. Full results of the Assessment for SFI

This appendix contains the full results of the assessment of the SFI forest certification scheme against the UK Government criteria.

The results are presented in the form of a table with five columns containing the following information:

Criteria: This sets out the UK Government criteria for assessing forest certification schemes which a scheme must meet.

Findings: This contains notes from the assessment process summarising the objective evidence compiled from the scheme documentation to justify the score given. *It should be noted that the text in this column is in the form of notes to summarise the information to be used in making an assessment and may in some cases be ambiguously or imperfectly worded. It was not designed to replace original scheme wording nor to be quoted in isolation.*

Score: This sets out the score given for the degree of compliance with the scheme with each criterion. See Section 2.2.3 for notes on the scoring system used.

L: A tick in this column indicates that the criterion relates to meeting UK Government requirements for legality.

S: A tick in the column indicates that the criterion relates to meeting UK Government requirements for sustainability.

Source Documents

Sustainable Forestry Initiative Standard (SFIS) 2005-2009 Edition.

Sustainable Forestry Initiative Audit Procedures and Qualifications (SFI APQ) 2005-2009 Edition.

Sustainable Forestry Initiative (SFI) Program On-Product Label Use Requirements (April 2005).

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

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

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**

1. Forest Standards

1.1. Content of standards for legal compliance

Criteria	Findings	Score	L ³	S
1.1.1 The standard requires that the forest owner/manager holds legal use rights to the forest	Fully addressed - not explicitly detailed in Principles, Objectives or Performance Measures but implicit in preamble to Principles of Forestry. Only for use in north America where there is a mature and functioning legislative system and existing administrative structures.	2	✓	
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: Forest management Environment Labour and welfare Health & safety	Fully addressed: Principle 8. Legal Compliance - <i>to comply with applicable federal, provincial, state, and local forestry and related environmental laws, statutes, and regulations.</i> Objective 11. <i>Commitment to comply with applicable federal, provincial, state, or local laws and regulations.</i>	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 CITES signatories since 1974 and 1975 respectively.	2	✓	

³ L: required to meet requirements for legal, S: required to meet requirements for sustainable variant

1.2. Content of standards for sustainable variant

Criteria	Findings	Score	L	S
<p>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:</p> <p>Intergovernmental processes designed for use at FMU level</p> <p>ITTO Criteria</p> <p>FSC P&C</p>	<p>The SFIS Overview document Section 6 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.</p> <p>There is no international interpretation of the Montreal process requirements for use at the FMU level in the US. Although not based specifically on the Montreal C&I, the SFIS History of the SFI Programme 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> for the SFIS standard review.</p>	1		✓
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> <p>Appropriate assessment of impacts and planning to minimise impacts;</p> <p>Protection of soil, water and biodiversity;</p> <p>Controlled and appropriate use of chemicals and use of Integrated Pest</p>	<p>i) Partially addressed. SFIS Objective 2. <i>To ensure long-term forest productivity and conservation of forest resources through prompt reforestation, soil conservation, afforestation, and other measures.</i> Objective 3. <i>To protect water quality in streams, lakes, and other water bodies.</i></p> <p>Objective 1 Indicator 1 <i>A long-term resource analysis to guide forest management planning at a level appropriate to the size and scale of the operation</i></p> <p>The SFIS 2005-2009 does not include a specific requirement for the assessment of impacts and planning to minimise impacts. It</p>	1		✓

Criteria	Findings	Score	L	S
<p>Management wherever possible.</p> <p>Proper disposal of wastes to minimise any negative impacts.</p>	<p>does however include a number of issue-specific requirements on assessment of impacts such as 4.1.5 (representation of cover types and habitat), 5.1 (manage impact of harvesting and other operations on visual quality), and 2.1.5 (artificial reforestation programs that consider potential ecological impacts of a different species or species mix).</p> <p>ii) Adequately addressed - Objective 3 Protect the water quality in stream, lakes and other water bodies. Performance Measure 2.3 - management practices to protect and maintain forest and soil productivity. Objective 4 - manage the quality and distribution of wildlife habitats and contribute to the conservation of biological diversity by developing and implementing stand level and landscape level measures that promote habitat diversity and the conservation of forest plants and animals including aquatic fauna. SFIS Principle 1 Sustainable Forestry. Principle 2 Responsible Practices.</p> <p>iii) Adequately addressed - Performance Measure 2.2 - minimise chemical use required to achieve management objectives. 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> <p>i. Management planning and implementation of management activities to avoid significant negative impacts on forest productivity.</p>	<p>i) Adequately addressed - SFIS Principle 1 Sustainable Forestry - requirement to practice sustainable forestry. SFIS Principle 2 Responsible Practices - use environmentally, economically and socially responsible practices. SFIS Principle 3 Reforestation and Productive Capacity- to provide for regeneration after harvest and maintain the productive capacity of the forestland base. SFIS Principle 4 Forest Health and Productivity - protect forest from damaging agents to maintain and improve long-term health and productivity. Objective 2 - ensure long-term forest productivity and conservation.</p>	2		✓

Criteria	Findings	Score	L	S
<p>Monitoring which is adequate to check compliance with all requirements, together with review and feedback into planning.</p> <p>Operations and operational procedures which minimise impacts on the range of forest resources and services.</p> <p>Adequate training of all personnel, both employees and contractors.</p> <p>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>Performance Measure 1.1. Program Participants shall ensure that long-term harvest levels are sustainable and consistent with appropriate growth and-yield models and written plans.</p> <p>ii) Adequately addressed - Performance Measure 13.1. <i>Program Participants shall establish a management review system to examine findings and progress in implementing the SFI Standard, to make appropriate improvements in programs, and to inform their employees of changes.</i></p> <p>iii) Adequately addressed - Performance Measure 2.3 - requirement to implement management practices to protect and maintain forest and soil productivity. Objective 5 - manage the visual impact of harvesting and other forest operations.</p> <p>iv) Adequately addressed - Performance Measure 10.1. Program Participants shall require appropriate training of personnel and contractors so that they are competent to fulfil their responsibilities under the SFI Standard.</p> <p>v) Adequately addressed - Performance Measure 1.1. Program Participants shall ensure that long-term harvest 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>ii. Management planning which aims to maintain or increase the health and vitality of forest ecosystems</p> <p>Management of natural processes, fires, pests and diseases.</p>	<p>i) Adequately addressed - forest health covered in a number of performance measures and indicators. Forest ecosystem vitality has limited specific coverage (Objective 9 Performance Measure 9.1, Indicator 1; Objective 4, Performance Measure 4.2, Indicator 2), but can be inferred from other requirements. Objective 2 - ensure long term forest productivity and conservation of forest resources. Objective 4 - manage wildlife habitat and contribute to conservation of biological diversity. SFIS Principle 4. Forest Health and Productivity - <i>To protect forests from uncharacteristic and economically or environmentally undesirable wildfire, pests, diseases, and other damaging agents and thus maintain and improve long-</i></p>	2		✓

Criteria	Findings	Score	L	S
<p>Adequate protection of the forest from unauthorised activities such as illegal logging, mining and encroachment.</p>	<p><i>term forest health and productivity.</i></p> <p>ii) Adequately addressed - Performance Measure 2.4. <i>Program Participants shall manage so as to protect forests from damaging agents, such as environmentally or economically undesirable wildfire, pests, and diseases, to maintain and improve long-term forest health, productivity and economic viability.</i> 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 Principle 8 and Objective 11 within the context of north American legislative system and existing administrative structures.</p>			
<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>iii. Implementation of safeguards to protect rare, threatened and endangered species.</p> <p>The conservation/set-aside of key ecosystems or habitats in their natural state.</p> <p>The protection of features and species of outstanding or exceptional value.</p>	<p>i) Adequately addressed - 2005-2009 SFIS Principle 7 and Objective 4. SFIS Guidance Document provides additional detail and definition on biodiversity hotspots and major tropical wilderness areas, forests with exceptional conservation value, invasive exotic species, BMP monitoring and surveillance audits, 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>Objective 4 – manage the quality and distribution of wildlife habitats and contribute to the conservation of biological diversity.</p> <p>ii) Adequately addressed - Objective 4 – manage wildlife habitat and contribute to conservation of biological diversity. Performance Measure 4.1, Indicator 3 <i>Plans to locate and protect known sites associated with viable occurrences of critically imperiled and imperiled species and communities.</i> Indicator 6 ... <i>participation in plans or programs for the conservation of old-growth forests in the region of ownership.</i> (but does not specify in natural state).</p> <p>iii) Adequately addressed - FECV requirements (as noted above). SFIS Principle</p>	2		✓

Criteria	Findings	Score	L	S
	7 7. Protection of Special Sites and Biological Diversity managing forests and lands of special significance in a manner that takes into account their unique qualities. Objective 6 – manage lands of ecologic, geologic, cultural or historic significance in a manner that recognises their special qualities.			

1.3. Standard-setting process

Criteria	Findings	Score	L	S
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>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>	2	✓	✓
1.3.2 The standard-setting body must include balanced representation of economic, environmental and social interest categories.	<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 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</p>	2		✓

Criteria	Findings	Score	L	S
	sectors made up of: 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.			
1.3.3 The decision-making process adopted by the standard-setting body should ensure: <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. 	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> 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.	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>ISO Guide 65: 1996 General Requirements for bodies operating product certification systems</p> <p>ISO Guide 66: 1999 General requirements for bodies operating assessment and certification/registration of environmental management systems (EMS) or equivalent.</p>	<p>SFI® Audit Procedures and Qualifications (SFI APQ) 2005-2009 Edition Section 2. Normative Reference <i>Audit firms must follow International Standard ISO 19011:2002, Guidelines for Quality and/or Environmental Management Systems Auditing, in auditing to the SFI Standard.</i></p> <p>Section 7 Competence of SFI Audit Firms, Audit Teams, and Auditors 7.1. Qualifications of Audit Firms - <i>Firms that conduct SFI audits must be environmental management system (EMS) registrars and accredited by the American National Standards Institute or the Standards Council of Canada.</i></p> <p>Section 7.4 Qualifications of Lead Auditors - <i>The lead auditor's organization or firm shall be accredited to conduct ISO 14001 certifications by the American National Standards Institute or be listed by the Registrar Accreditation Board, or equivalent.</i></p>	2	✓	✓
<p>2.2 Certification is undertaken by an individual or body which is accredited to evaluate against forest management standards.</p>	<p>Adequately addressed:</p> <ul style="list-style-type: none"> • Compulsory national accreditation of certification bodies for 14001 certification by ANSI-RAB NAP or SCC – SFI APQ Section 7.1. Qualifications of Audit Firms • SFI APQ Section 7.2. Qualifications of Audit Teams, 7.3. Qualifications of Auditors, 7.4. Qualifications of Lead Auditors and 7.5. Maintenance and Improvement of Competence • SFI APQ Section 5. SFI Audit Program Monitoring – specific quality control by SFB of the auditors and audit procedures through annual peer review 	2	✓	✓

Criteria	Findings	Score	L	S
2.3 The certification audit must include assessment of systems and documentation together with verification of outcomes in the forest adequate to ensure that both system and performance requirements in the standard are being met.	<p>Adequately addressed - SFI-APQ Section 6 SFI Audit Activities, contains details of how SFI certification is to be carried out.</p> <p>Section 6.1.2. Objectives and Scope for SFI Audits - notes that the audit team should ensure objectives and scope of the audit allow for accurate field determination of conformance for the entire operating unit; and that verification shall establish whether management system and on-the-ground activities meet the requirements of the SFIS.</p> <p>Section 6.2 Determination of Conformance notes - <i>The certification team must ensure that all sampling and measurement procedures are of high quality.</i></p>	2	✓	✓
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.	<p>Adequately addressed.</p> <p>SFI Audit Procedures and Qualifications Section 6.2 Determination of Conformance - <i>Evidence shall 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></p>	2		✓
2.5 A summary of the results of the certification audit (excluding confidential information) is publicly available to interested parties.	<p>Adequately addressed</p> <p>SFI APQ Section 8. Public Communication and Claims, 8.1. Preparing and Submitting a Public Report - if a programme participant wishes to make any public claims or statements about its SFI certification a public report will be posted on the SFB website and available for public review 5.10 Verification Report - requires the Program participant to work with the verifying organisation to prepare an audit summary for public disclosure.</p>	2		✓
2.6 There is an accessible and functioning mechanism for dealing with complaints and disputes which is open to any interested party.	<p>Adequately addressed - SFIAPQ Section 9. Interpretations, Feedback, and Disputes and Appeals 8- 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</p>	2	✓	✓

Criteria	Findings	Score	L	S
	<p>and 5 Canadian Provinces), or if an SIC is not in existence to the SFI National Inconsistent Practices office via the External Review Panel Secretariat – SFI APQ Section 9.3.1. Disputes or Appeals Regarding a Single Instance or Claim of Nonconformance.</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 – SFI APQ Section 9.3.2. Disputes or Appeals Questioning the Validity of a Certification.</p>			

3. Accreditation

Criteria	Findings	Score	L	S
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>Adequately addressed - Section 7 Competence of SFI Audit Firms, Audit Teams, and Auditors 7.1. Qualifications of Audit Firms - <i>Firms that conduct SFI audits must be environmental management system (EMS) registrars and accredited by the American National Standards Institute or the Standards Council of Canada.</i></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>	2	✓	✓

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	<p>Adequately addressed - Section 7 Competence of SFI Audit Firms, Audit Teams, and Auditors 7.1. Qualifications of Audit Firms - <i>Firms that conduct SFI audits must be environmental management system (EMS) registrars and accredited by the American National Standards Institute or the Standards Council of Canada.</i></p> <p>The US (ANSI-RAB NAP) and Canadian (SCC) accreditation bodies are IAF members and</p>	2	✓	✓

Criteria	Findings	Score	L	S
with ISO Guide 61 or equivalent.	Multilateral Recognition Arrangement (MLA) Signatories for Quality Management Systems and therefore have had peer evaluation of their compliance with international and IAF requirements.			
4.1.2 There must be a certified chain of custody in place from the forest of origin to the final product.	<p>Adequately addressed for product with a full chain of custody providing information on the percentage from certified forests. Product labelled under the wood flow accounting approach is not acceptable.</p> <p>Requirements for chain of custody are detailed in SFIS and SFI Program On-Product Label Use Requirements. Two approaches are allowed - wood flow accounting or chain of custody.</p> <p>The wood flow accounting approach does not provide information on the proportion of material from SFI certified forests and is not acceptable.</p> <p>Sections 12.1.4 and 12.2.4 note that programme participants who wish to make a claim regarding the percentage of certified material from a forest independently certified to the SFI Standard are required to use the chain of custody certification procedures set out in Annex 4 of the PEFC Council Technical Document. Product using this approach is acceptable.</p>	2	✓	✓
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 Office of Label use and licensing, Section 10 Application requirements and Section 12.1 X Percent Content Label, and Section 12.2 100% Content Label.	2	✓	✓

4.2. Criteria for certified and non-certified mixed products

Criteria	Findings	Score	L	S
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Criteria	Findings	Score	L	S
<p>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:</p> <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 	<p>Adequately addressed - recycled material is covered in SFI Program On-Product Label Use Requirements Section 3.6 Neutral Sources.</p> <p>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.</p>	2	✓	✓
<p>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.</p>	<p>Adequately addressed - for percentage label use mixing of certified and uncertified material dealt with in Section 12.1.4 - which requires use of chain of custody certification procedures set out in Annex 4 of the PEFC Council Technical Document.</p> <p>The Program includes the following to avoid illegal sources:</p> <p>SFIS Performance Measure 8.3 requires Program Participants to define and implement policies which ensure procurement activities do not compromise the principles of sustainable forestry.</p> <p>When sourcing outside of the US and Canada SFIS Performance Measure 8.5 requires participants to ensure that their procurement programs support efforts to thwart illegal logging.</p> <p>On-Product Label Use Requirements Section 3.7 Non-acceptable Sources - 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>	2	✓	

Criteria	Findings	Score	L	S
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.	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.	0		✓

Obsolete