

# **Appendix 1e. Review of the Sustainable Forestry Initiative forest certification scheme**

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

## **Executive Summary**

Date of Current Assessment: May 2006 (published December 2006)

Anticipated Date of Next Assessment: May 2008

### **Current Status**

Meets requirements for legality.

Meets requirements for sustainability, provided the Chain of Custody system is used.

### **Changes from last assessment**

N/A

## **Source Documents**

Sustainable Forestry Initiative Standard (SFIS) 2005-2009 Standard

SFI Audit Procedures and Qualifications (SFI APQ) 2005-2009 Standard

The Sustainable Forestry Initiative Program: Requirements for Fiber Sourcing, Chain of Custody and Product Labels, 15 June 2006

Sustainable Forestry Initiative Program 2005-2009 SFI Standard Overview: Overview, Governance, and Historical Information.

Bylaws of the Sustainable Forestry Board Inc, 15 July 2004

SFI Application for PEFC Assessment and Endorsement, June 2005

# 1. Forest Standards

## 1.1. Content of standards for legal compliance

Criteria	Findings	Score	L <sup>1</sup>	S
1.1.1 The standard requires that the forest owner/manager holds legal use rights to the forest	<p>Partially addressed.</p> <p>The SFIS does not include a specific reference to legal use rights in the SFIS Principles or Objectives for Forest Management.’</p> <p>However, this is addressed through SFIS Objective 11 Legal and Regulatory Compliance within the context of US and Canadian legislative systems and existing administrative structures.</p>	1	✓	
1.1.2 The standard requires compliance from both the forest management organisation and any contractors with local and national legal requirements including those relevant to: <ul style="list-style-type: none"> <li>• Forest management</li> <li>• Environment</li> <li>• Labour and welfare</li> <li>• Health &amp; safety</li> <li>• Other parties’ tenure and use rights</li> </ul>	<p>Adequately addressed.</p> <p>SFIS Objective 11 <i>Commitment to comply with applicable federal, provincial, state, or local laws and regulations</i></p> <p>SFIS Performance Measure 11.1 <i>Program Participants shall take appropriate steps to comply with applicable federal, provincial, state, and local forestry and related environmental laws and regulations.</i></p> <p>SFIS Performance Measure 11.2 <i>Program Participants shall take appropriate steps to comply with all applicable social laws at the federal, provincial, state, and local levels in the country in which the Program Participant operates.</i></p> <p>Performance Measure 11.2 Indicator 1 <i>Written policy demonstrating commitment to comply with social laws, such as those covering civil rights, equal employment opportunities, antidiscrimination and antiharassment measures, workers’ compensation, indigenous peoples’ rights, workers and communities’ right to know, prevailing wages, workers’ right to organize, and occupational health and safety.</i></p>	2	✓	
1.1.3 The standard requires payment of all relevant royalties and taxes	<p>Partially addressed.</p> <p>Not an explicit requirement in SFIS, but implicit in compliance with (Objective 11) laws and</p>	1	✓	

<sup>1</sup> L: required to meet requirements for legal, S: required to meet requirements for sustainable variant

Criteria	Findings	Score	L'	S
	regulations within the context of US and Canadian legislative systems and existing administrative structures.			
1.1.4 The standard requires compliance with the requirements of CITES.	<p>Adequately addressed.</p> <p>Not an explicit requirement in SFIS, but implicit in compliance with (Objective 11) laws and regulations within the context of US and Canadian legislative systems and existing administrative structures.</p> <p>The US and Canada are CITES signatories (ratified 14/01/1974 and 10/04/1975 respectively).</p>	2	✓	

## ***1.2. Content of standards for sustainable variant***

Criteria	Findings	Score	L	S
1.2.1 Certification standards must be consistent with a widely accepted set of international principles and criteria defining sustainable or responsible forest management at the forest management unit level.	<p>Adequately addressed.</p> <p>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 &amp; Paper Association (AF&amp;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.</p> <p>Although not based specifically on the Montreal C&amp;I, the 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>SFI Application to PEFC states that <i>'During the revision process to produce the SFI 2005-2009 Standard there were specific revisions that were made to the Standard to better align it with the PEFC endorsement requirements as set out in the most recent version of the PEFC Memorandum Requirements Checklist dated 2003/04/02. Most</i></p>	2		✓

Criteria	Findings	Score	L	S
	<i>of the revisions were around alignment with Montreal Process C&amp;I to provide for a tighter alignment with the PEOLG and other social aspects of forestry.'</i>			
1.2.2 The standard must be performance-based.	Adequately addressed.  SFIS includes a range of performance based criteria addressing the requirements in 1.2.3 – 1.2.6.	2		✓
1.2.3 The standard must ensure that harm to ecosystems is minimised. In order to do this the standard must include requirements for:  a. Appropriate assessment of impacts and planning to minimise impacts;  b. Protection of soil, water and biodiversity;  c. Controlled and appropriate use of chemicals and use of Integrated Pest Management wherever possible.  d. Proper disposal of wastes to minimise any negative impacts.	a. Partially addressed.  The SFIS 2005-2009 does not include a specific requirement for the assessment of impacts and planning to minimise impacts applicable to all participants. It does however include a number of issue-specific requirements on assessment of impacts such as SFIS Performance Measure 4.1 Indicator 5 (forest cover types and habitat), SFIS Performance Measure 5.1 (managing impact of harvesting and other operations on visual quality), and SFIS Performance Measure 2.1 Indicator 5 (artificial reforestation programs that consider potential ecological impacts of a different species or species mix).  b. Adequately 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>  SFIS Objective 3 <i>To protect water quality in streams, lakes, and other water bodies.</i>  SFIS Objective 4 <i>To manage the quality and distribution of wildlife habitats and contribute to the conservation of biological diversity...</i>  c. Adequately addressed  SFIS Performance Measure 2.2 <i>Program Participants shall minimize chemical use required to achieve management objectives while protecting employees, neighbors, the public, and the environment.</i>  Indicator 1: <i>Minimized chemical use required to achieve management objectives.</i>  Indicator 2: <i>Use of least-toxic and narrowest-spectrum pesticides necessary to achieve management objectives.</i>	1		✓

Criteria	Findings	Score	L	S
	<p>Indicator 5: <i>Use of integrated pest management where feasible.</i></p> <p>d. Adequately addressed</p> <p>Waste disposal not specified in SFIS but included in compliance with laws and regulations (SFIS Objective 11) within the context of US and Canadian legislative systems and existing administrative structures.</p>			
<p>1.2.4 The standard must seek to ensure that productivity of the forest is maintained. In order to do this the standard must include requirements for:</p> <p>a. Management planning and implementation of management activities to avoid significant negative impacts on forest productivity.</p> <p>b. Monitoring which is adequate to check compliance with all requirements, together with review and feedback into planning.</p> <p>c. Operations and operational procedures which minimise impacts on the range of forest resources and services.</p> <p>d. Adequate training of all personnel, both employees and contractors.</p> <p>e. 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>a. Adequately addressed</p> <p>SFIS Principle 3 Reforestation and Productive Capacity: <i>to provide for regeneration after harvest and maintain the productive capacity of the forestland base.</i></p> <p>SFIS Principle 4 Forest Health and Productivity: <i>to protect forest from damaging agents and maintain and improve long-term forest health and productivity.</i></p> <p>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></p> <p>SFIS Performance Measure 2.3 <i>Program Participants shall implement management practices to protect and maintain forest and soil productivity.</i></p> <p>b. Adequately addressed</p> <p>SFIS Objective 13 <i>To promote continual improvement in the practice of sustainable forestry and monitor, measure, and report performance in achieving the commitment to sustainable forestry.</i></p> <p>c. Adequately addressed</p> <p>SFIS Performance Measure 2.3 <i>Program Participants shall implement management practices to protect and maintain forest and soil productivity.</i></p> <p>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></p> <p>SFIS Objective 5 <i>To manage the visual impact of harvesting and other forest operations.</i></p>	2		✓

Criteria	Findings	Score	L	S
	<p>d. Adequately addressed</p> <p>SFIS Objective 10 <i>To improve the practice of sustainable forest management by resource professionals, logging professionals, and contractors through appropriate training and education programs.</i></p> <p>e. Adequately addressed</p> <p>SFIS Performance Measure 1.1 <i>Program Participants shall ensure that long-term harvest levels are sustainable and consistent with appropriate growth-and-yield models and written plans.</i></p>			
<p>1.2.5 The standard must seek to ensure that forest ecosystem health and vitality is maintained. In order to do this the standard must include requirements for:</p> <p>a. Management planning which aims to maintain or increase the health and vitality of forest ecosystems</p> <p>b. Management of natural processes, fires, pests and diseases.</p> <p>c. Adequate protection of the forest from unauthorised activities such as illegal logging, mining and encroachment.</p>	<p>a. Adequately addressed</p> <p>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></p> <p>SFIS Objective 4 <i>To manage the quality and distribution of wildlife habitats and contribute to the conservation of biological diversity by developing and implementing stand- and landscape-level measures that promote habitat diversity and the conservation of forest plants and animals, including aquatic fauna.</i></p> <p>b. Adequately addressed</p> <p>SFIS Performance Measure 2.4 <i>Program Participants shall manage so as to protect forests from damaging undesirable wildfire, pests, and diseases, to maintain and improve long-term forest health, productivity and economic viability.</i></p> <p>c. Adequately addressed</p> <p>Unauthorised activities not specifically addressed in SFIS but included in compliance with laws and regulations (SFIS Objective 11) within the context of US and Canadian legislative systems and existing administrative structures.</p>	2		✓
<p>1.2.6 The standard must seek to ensure that biodiversity is maintained. In order to do this the standard must include requirements for:</p> <p>a. Implementation of</p>	<p>a. Adequately addressed</p> <p>SFIS Objective 4 <i>To manage the quality and distribution of wildlife habitats and contribute to the conservation of biological diversity by developing and implementing stand- and landscape-level measures that promote habitat</i></p>	2		✓

Criteria	Findings	Score	L	S
<p>safeguards to protect rare, threatened and endangered species.</p> <p>b. The conservation/set-aside of key ecosystems or habitats in their natural state.</p> <p>c. The protection of features and species of outstanding or exceptional value.</p>	<p><i>diversity and the conservation of forest plants and animals, including aquatic fauna.</i></p> <p>SFIS Performance Measure 4.1 indicator 2 <i>Program to protect threatened and endangered species</i></p> <p>SFIS Performance Measure 2.2 indicator 6k: <i>use of methods to ensure protection of threatened and endangered species.</i></p> <p>b. Adequately addressed</p> <p>SFIS Objective 4 <i>To manage the quality and distribution of wildlife habitats and contribute to the conservation of biological diversity by developing and implementing stand- and landscape-level measures that promote habitat diversity and the conservation of forest plants and animals, including aquatic fauna.</i></p> <p>SFIS 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></p> <p>c. Adequately addressed</p> <p>SFIS Objective 4 <i>To manage the quality and distribution of wildlife habitats and contribute to the conservation of biological diversity by developing and implementing stand- and landscape-level measures that promote habitat diversity and the conservation of forest plants and animals, including aquatic fauna.</i></p> <p>SFIS Objective 6 <i>To manage Program Participant lands that are ecologically, geologically, historically, or culturally important in a manner that recognizes their special qualities</i></p>			

### 1.3. Standard-setting process

Criteria	Findings	Score	L	S
<p>1.3.1 The standard-setting process must be consistent with the requirements of <i>ISO Guide 59: Code of Good Practice for Standardisation</i> or the <i>ISEAL Code of Good Practice for Setting Social and Environmental Standards</i> or</p>	<p>Adequately addressed.</p> <p>Section 3.0 of The SFI Program Enhancement Process of Sustainable Forestry Initiative Program: Overview, Governance, and Historical Information states that '<i>The SFI Standard setting process is consistent with the International Organization for Standardization (ISO) Guide 59, "Code of good practice for standardization"</i></p>	2		✓

Criteria	Findings	Score	L	S
equivalent.	<p>Compliance with ISO Guide 59 or ISEAL Code is not specifically required.</p> <p>Although the AF&amp;PA is an ANSI accredited standards development organisation – this accreditation covers:</p> <ul style="list-style-type: none"> <li>• The development and maintenance of guidelines and requirements for structural design of lumber and lumber products, and their connectors.</li> <li>• The development and maintenance of wood design standards including the design of wood members and their connectors</li> </ul> <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>			
1.3.2 The standard-setting process must seek to ensure balanced representation and input from the economic, environmental and social interest categories.	<p>Partially addressed.</p> <p>The Sustainable Forestry Board (SFB) was chartered as an independent body in July 2000 to oversee development and continuous improvement of the SFI Program Standard, certification processes and procedures and program quality control mechanisms. the SFB <i>‘shall have sole responsibility for the Sustainable Initiative Standard and the verification process...’</i> (Bylaws of the Sustainable Forestry Board), The 15-member Board consists of</p> <ul style="list-style-type: none"> <li>• 5 from Program Participants (forest industry)</li> <li>• 5 from conservation and environmental organizations</li> <li>• 5 from broader forestry community representation (state and/or federal agencies; professional/ academic groups; non-industrial landowners)</li> </ul> <p>The 3 chamber approach seeks to reflect the full range of stakeholder groups. However, submissions from interested parties have noted that the full range of stakeholder groups are not involved, such that some stakeholder groups in the social interest category are not currently represented on the SFB.</p> <p>The turnover in SFB membership should allow</p>	1		✓

Criteria	Findings	Score	L	S
	access to groups that are not currently represented on the Board. The SFB has a number of voluntary working committees to maintain the SFI standard; appointments to sub-committees are not limited to SFB member organisations, which should allow other opportunities for input.			
<p>1.3.3 The standard-setting and decision-making process adopted must seek to ensure:</p> <ul style="list-style-type: none"> <li>No single interest can dominate the process;</li> <li>No decision can be made in the absence of agreement from the majority of an interest category.</li> </ul>	<p>Partially addressed</p> <p>Section 5 of Bylaws of the Sustainable Forestry Board requires that <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 single interest can dominate the process. However, these rules do theoretically allow the potential for decisions to be made without the majority agreement from all membership sectors. In practice, SFB has to date operated on the basis of achieving consensus for all decision-making.</p>	1		✓

## 2. Certification

Criteria	Findings	Score	L	S
2.1 Certification must be undertaken by a body whose organisation, systems and procedures conform to applicable ISO guidance, or publicly available equivalent.	<p>Adequately addressed</p> <p>SFI Audit Procedures and Qualifications Section 7 Competence of SFI Audit Firms, Audit Teams, and Auditors 7.1 Qualifications of Audit Firms requires that <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>	2	✓	✓
2.2 Certification is undertaken by a body which is accredited to evaluate against forest management standards.	<p>SFI Audit Procedures and Qualifications Section 7 Competence of SFI Audit Firms, Audit Teams, and Auditors 7.1 Qualifications of Audit Firms requires that <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>	2	✓	✓

Criteria	Findings	Score	L	S
	In addition, a specific accreditation programme for certification against the SFI 2005 - 2009 has been developed by the ANSI - ASQ National Accreditation Board (ANAB).			
2.3 The requirements for certification audits 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.	Adequately addressed  SFI APQ Section 6.1.2 requires that <i>'An SFI audit shall verify whether Program Participants has effectively implemented its SFI Standard program requirements on the ground.'</i>  SFI APQ Section 6.2 specifies that <i>'Evidence shall be compiled by examination of operating procedures, study of materials relating to forestry practices, and on-the-ground examination of field performance....'</i>	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.	Partially addressed  SFI APQ Section 6.2 requires that <i>'Evidence shall be compiled... through meetings with employees, contractors and other third parties (e.g. government agencies, community groups, conservation organizations), as appropriate, to determine conformance to the Standard.'</i>  This does not specifically require that stakeholder consultation must be designed to ensure the identification of all relevant issues.	1		✓
2.5 A summary of the results of the certification audit (excluding confidential information) must be publicly available to interested parties.	Adequately addressed  SFI APQ Section 8.1 Preparing and Submitting a Public Report requires that <i>'A Program Participants that wishes to make any public claims or statements about its SFI certification, recertification, or surveillance audit shall provide a report to the SFB not less than two weeks before making the public report. The public report will be posted on the SFB website and available for public review.'</i>	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 APQ Section 9 Interpretations, Feedbacks, and Disputes and Appeals - sets out the procedures for dealing with complaints and disputes:  9.3 Disputes or Appeals between an Auditor and a Program Participants: <i>'Auditors shall</i>	2	✓	✓

Criteria	Findings	Score	L	S
	<p><i>have an internal dispute resolution process.'</i></p> <p>9.3.1 Disputes or Appeals Regarding a Single Instance or Claim of Nonconformance: <i>'Any party with information or claims about a Program Participant's individual practices that may be in non-conformance may seek to have those claims investigated.... Within 45 days of receipts of the compliant, the Program Participants shall respond to the complainant and forward a copy of the complaint and its response to the Program Participant's auditor for future review via surveillance or certification audits. The auditor shall investigate the validity of the complaint and the Program Participant's response and resolution of the claim at the time of the next scheduled surveillance audit.'</i></p> <p>9.3.2 Disputes or Appeals Questioning the Validity of a Certification. This is also open to any parties and the Program Participant is required to respond to the complainant in writing and forward it to its auditor within 45 days.</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 are consistent with ISO 17011:2004 <i>Conformity assessment -- General requirements for accreditation bodies accrediting conformity assessment bodies</i> or equivalent.	<p>Adequately addressed.</p> <p>SFI Audit Procedures and Qualifications Section 7 Competence of SFI Audit Firms, Audit Teams, and Auditors 7.1 Qualifications of Audit Firms requires that 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.</p> <p>American National Standards Institute and Standards Council of Canada 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

Criteria	Findings	Score	L	S
4.1 Assessment of chain of custody must be undertaken by a certification body operating in accordance with ISO Guide 65 or equivalent and accredited by an accreditation body operating in accordance with ISO 17011 or equivalent.	<p>Fully addressed.</p> <p>SFI APQ Section 7.1 Qualifications of Audit Firms requires that <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 Sustainable Forestry initiative Program: Requirements for Fiber Sourcing, Chain of Custody and Product Labels; Annex 1 SFI Label Use and Fiber Sourcing Requirements; Appendix 1 Criteria for the evaluation of chain of custody certification standards for use in the SFI program. Criteria 5: <i>The standard requires the use of certification bodies accredited by ANSI or an equivalent body recognised by the International Accreditation Forum (IAF) to conduct Chain-of-Custody (CoC) Conformity Assessment based on ISO Guide 65.</i></p>	2	✓	✓
4.2 There must be a certified chain of custody in place from the forest of origin to the final certified product which provides a link between the certified material in the product or product line and certified forests.	<p>Adequately addressed</p> <p>The Sustainable Forestry Initiative Program: Requirements for Fiber Sourcing, Chain of Custody and Product Labels; Annex 1 SFI Label Use and Fiber Sourcing Requirements Section 6 Percent Content Labels, using Annex 2 SFI Chain of Custody Standard provides a means for linking certified material in the product or product line to SFI-certified land bases.</p> <p>Product labelled under the wood flow accounting approach is not acceptable.</p>	2	✓	✓
4.3 If mixing of certified and uncertified material in a product or product line is allowed, the uncertified material must be covered by a verifiable system which is designed to ensure that it is from legal sources.	<p>Adequately addressed</p> <p>SFIS Objectives for Procurement, Objective 8 <i>To broaden the practice of sustainable forestry through procurement programs.</i></p> <p>Performance Measure 8.5 <i>Program Participants shall ensure their procurement programs support the principles of sustainable forestry, including efforts to thwart illegal logging and promote conservation of biological diversity.</i></p> <p>8.5.1 <i>Process to assess the risk that the Program Participant's procurement program could acquire material from illegal logging. This process may include relying on the adequacy of</i></p>	2	✓	

Criteria	Findings	Score	L	S
	<p><i>legal protections in the United States and Canada, where laws against domestic illegal logging are enforced.</i></p> <p><i>8.5.2 Program to address any significant risk identified under 8.5.1</i></p> <p>The Sustainable Forestry Initiative Program: Requirements for Fiber Sourcing, Chain of Custody and Product Labels; Annex 2 SFI Chain of Custody Standard, Section 3.6 <i>Controversial sources.</i></p>			
<p>4.4 If mixing of certified and uncertified material in a product or product line is allowed and the proportion of uncertified material can exceed 30%, then the uncertified material must be covered by a verifiable system which ensures that it is from sustainable forest sources where the requirements for sustainability set out in criteria 1.2.3 – 1.2.6 above are being met.</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		✓
<p>4.5 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.</p>	<p>Fully addressed</p> <p>The Sustainable Forestry Initiative Program: Requirements for Fiber Sourcing, Chain of Custody and Product Labels; Annex 1 SFI Label Use and Fiber Sourcing Requirements Section 7 Office of Label Use &amp; Licensing, and Annex 3 Rules for Use of SFI Product Labels.</p>	2	✓	✓

Criteria	Findings	Score	L	S
<p>4.6 If recycled material is used there must be a verifiable system in place which is designed to ensure that recycled material is from the following categories:</p> <ul style="list-style-type: none"> <li>• Pre-consumer recycled wood and wood fibre or industrial by-products but excluding sawmill co-products</li> <li>• Post-consumer recycled wood and wood fibre</li> <li>• Drift wood</li> </ul>	<p>Fully addressed</p> <p>The Sustainable Forestry Initiative Program: Requirements for Fiber Sourcing, Chain of Custody and Product Labels; Annex 1 SFI Label Use and Fiber Sourcing Requirements Section 3.7. <i>Neutral sources: Recovered wood fiber and recovered paper and sawdust or dry shavings produced as a by-product of a primary or secondary manufacturing process.</i></p> <p>Annex 2 ('Chain of Custody Standard') sections 2.2 and 3.2 require that "the organisation shall identify and verify the category of the origin of all procured raw material."</p>	2	✓	✓