

# **Appendix 1a. Review of the Canadian Standards Association forest certification scheme**

This appendix contains the full results of the review of CSA 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.

### **Changes from last assessment**

N/A

## **Source Documents**

CAN/CSA-Z809-02 Sustainable Forest Management Requirements and Guidance, May 2003

CSA PLUS 1133 Guidelines for Sustainable Forest Management – General Audit Principles and Audit Procedures for Auditing Sustainable Forest Management, March 2003

PEFC Council Technical Document Annex 4 Chain of Custody of Forest Based Products – Requirements, 17 June 2005

CSA International: Specifications for Use of the CSA SFM Mark, March 2003

CSA-SDP-1-03 CSA Policy governing standardization – Code of good practice for standardization, December 2003

CSA-SDP-2.1-99 CSA Directives and guidelines governing standardization, Part 1: Participants and organizational structure, February 1999

CSA Application to PEFC Checklist and Reference, 29 March 2004

Standards Council of Canada (SCC) Management Systems Accreditation Program (MSAP) Handbook – Conditions and Procedures for the Accreditation of Organizations Certifying/ Registering Management Systems, April 2006

SCC CAN-P-14B (verbatim adoption of ISO/IEC Guide 66)

SCC CAN-P-1D: Accreditation of Standards Development Organisation

SCC The Sustainable Forest Management Industry Sector Program (SFMP) Handbook: Criteria, Procedures, and Conditions for Applicant and Qualified EMS Registration Bodies, July 2004.

# 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>Adequately addressed by CAN/CSA-Z809-02 in sections 7.3.1, 7.3.2 and 7.3.4:</p> <p>Section 7.3.1 Defined Forest Area (DFA): <i>'The organization shall designate a clearly defined forest area to which this Standard applies. The organisation shall define the geographic extent and the respective ownership and management responsibilities for the DFA.'</i></p> <p>Section 7.3.4 Rights and Regulations: <i>'The organisation shall demonstrate that relevant legislation and regulatory requirements that relate to ownership, tenures, and rights and responsibilities in the DFA have been identified and complied with.'</i></p>	2	✓	
<p>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:</p> <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 by CAN/CSA-Z809-02 in the following sections:</p> <p>Section 4.1 General requirements of sustainable forest management requirements: <i>'compliance with relevant legislation on the DFA'</i></p> <p>Section 7.2: policy commitment to meet or exceed all legal requirements</p> <p>Section 7.3.2 Ownership Rights and Responsibilities: <i>'The organisation shall respect the legal rights and responsibilities of other parties in the DFA that are not part of the registration applicant.'</i></p> <p>Section 7.3.4 Rights and Regulations: <i>'The organisation shall</i></p> <p><i>a) demonstrate that relevant legislation and regulatory requirements that relate to ownership, tenures, and rights and responsibilities in the DFA have been identified and complied with.</i></p> <p><i>b) demonstrate that Aboriginal and treaty rights have been identified and respected.</i></p>	2	✓	

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

Criteria	Findings	Score	L'	S
	<i>c) demonstrate that the legal and constitutional rights, and the health and safety of DFA-related workers, are respected and their contributions to SFM are encouraged. ‘</i>			
1.1.3 The standard requires payment of all relevant royalties and taxes	Adequately addressed by CAN/CSA-Z809-02 in the following sections:  Criterion 5 Multiple Benefits to Society: c) iii) <i>local taxation as determined by applicable assessment and appeal procedures;</i> c) iv) <i>revenues to the Crown and other landlords as determined by applicable stumpage or market rates.</i>	2	✓	
1.1.4 The standard requires compliance with the requirements of CITES.	Implicitly addressed by CAN/CSA-Z809-02 section 7.3.4 Rights and Regulations.  Canada is a CITES signatory and CITES is implemented through the Wild Animal and Plant Protection and Regulation of International and Inter-provincial Trade Act (WAPPRIITA). Environment Canada is the federal government department responsible for administering and enforcing CITES.	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.	Adequately addressed.  The Z809 requirements for SFM are based on an FMU level interpretation of the Helsinki and Montreal intergovernmental processes. This interpretation was undertaken by the Canadian Council of Forest Ministers (CCFM), an inter-provincial governmental body, for application only in Canada.  Z809 incorporates the CCFM SFM criteria. CSA SFM elements for compliance are defined under each CCFM criterion.	2		✓
1.2.2 The standard must be performance-based.	Partially addressed  CAN/CSA-Z809-02 section 6 sets out the performance requirements that the organisation needs to address. Specific performance thresholds for each element in section 6 must be defined as a result of the required public consultation process (section 5). However, evidence from certified organisations shows that	1		✓

Criteria	Findings	Score	L	S
	there is considerable scope for variability in these thresholds.			
<p>1.2.3 The standard must ensure that harm to ecosystems is minimised. In order to do this the standard must include requirements for:</p> <p>a. Appropriate assessment of impacts and planning to minimise impacts;</p> <p>b. Protection of soil, water and biodiversity;</p> <p>c. Controlled and appropriate use of chemicals and use of Integrated Pest Management wherever possible.</p> <p>d. Proper disposal of wastes to minimise any negative impacts.</p>	<p>a. Adequately addressed. CAN/CSA-Z809-02 does not contain specific requirements on impact assessments and planning to minimise impacts that are applicable to all applicants. However, sections 7.3.6 Setting DFA-Specific Performance Requirements and 7.3.7 SFM Plan contains requirements on evaluation and review to minimise impacts. In addition, the legal framework relating to forest management includes requirements for forest plans to adequately assess and minimise environmental impacts.</p> <p>b. Adequately addressed by CAN/CSA-Z809-02 requirements to minimise impacts on soil, water and biodiversity (see also criterion 1.2.6), in section 6, elements 1.1, 1.2, 1.3, 3.1. 3.2.</p> <p>c./d. Adequately addressed. CAN/CSA-Z809-02 does not include requirements on chemical controls and waste disposal. However, the legal framework relating to forest management includes requirements for forest plans to adequately assess and minimise environmental impacts, which includes chemical and waste issues. This is also covered in the Canadian Environmental Protection Act (1999) and the Pest Control Products Act.</p>	2		✓
<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>a. Adequately addressed by CAN/CSA-Z809-02 requirements for an SFM plan (section 7.3.7), and control of implementation &amp; operations (section 7.4).</p> <p>b. Adequately addressed. Monitoring is addressed by CAN/CSA-Z809-02 section 7.5.1 Monitoring and Measurement: <i>The organization shall establish and maintain documented procedures to monitor, on a regular basis, the key characteristics of its operations and activities that demonstrate progress towards SFM in the DFA....</i></p> <p>c. Adequately addressed. CAN/CSA-Z809-02 addresses operational procedures and controls to meet SFM requirements (section 7.4.6).</p> <p>d. Adequately addressed. CAN/CSA-Z809-02 contains requirements for training, awareness,</p>	1		✓

Criteria	Findings	Score	L	S
<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>qualifications and knowledge (section 7.4.2).</p> <p>e. Partially addressed. CAN/CSA-Z809-02 does not include specific requirements for control of harvest levels, based on the production capacity of the defined forest area. Although section 6 includes forest ecosystem productivity (element 2.2), there are no specific references to harvest levels. Element 5.1 requires the forest to be sustainably managed for an '<i>acceptable and feasible mix of timber and non-timber benefits</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 by CAN/CSA-Z809-02 CCFM Criteria 2 <i>Conserve forest ecosystem condition and productivity by maintaining the health, vitality, and rates of biological production</i> and requirements for an SFM plan (section 7.3.7).</p> <p>b. Adequately addressed by CAN/CSA-Z809-02 requirements relating to maintenance of ecosystem processes, in terms of species diversity (element 1.2), genetic diversity (element 1.3), forest ecosystem resilience (element 2.1), forest ecosystem productivity (element 2.2), carbon uptake and storage (element 4.1) and forest land conversion (element 4.2), such as CSA SFM Element 2.1 <i>Conserve ecosystem resilience by maintaining both ecosystem processes and ecosystem condition</i>.</p> <p>CAN/CSA-Z809-02 does not include specific references to fire, pests and diseases, apart from the general requirements for legal compliance. Legal requirements include provincial government fire prevention regulations (such as Fire Prevention New Brunswick, Forest Fire Prevention and Suppression Regulations in British Columbia).</p> <p>c. Adequately addressed. CAN/CSA-Z809-02 requirements concerning protection from unauthorised activities are implicit, although this is considered to be adequately addressed by the legal framework and interpretation of SFM elements during the public participation process.</p>	2		✓

Criteria	Findings	Score	L	S
<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 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>Maintenance of biodiversity is partially addressed in CAN/CSA-Z809-02 section 6 CCFM Criterion 1 Conservation of biological diversity:</p> <p>a) Partially addressed by Element 1.2 <i>Species Diversity</i> and element 1.3 <i>Genetic Diversity</i>. However, the protection of rare, threatened and endangered species is not explicit, and this depends on local values set by the public participation process. Although there are legal controls, these would not fully amount to the implementation of safeguards.</p> <p>b) Adequately addressed by Element 1.1 <i>Ecosystem Diversity</i>.</p> <p>c) Partially addressed by Element 1.4 <i>Protected Areas and Sites of Special Biological Significance</i>. However, the protection of species of exceptional value is not explicit, and depends on local values set by the public participation process.</p>	1		✓

### 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 equivalent.</p>	<p>Adequately addressed:</p> <p>CSA is accredited by SCC against the requirements of CAN-P-1D for standard setting. This incorporates ISO Guide 59 requirements.</p> <p>CSA-SDP-1-03 CSA Policy governing standardization – Code of good practice for standardization Section 0 states that ‘<i>The principles of ISO/IEC Guide 59:1994, Code of good practice for standardization, have been used as a basis for this policy document.</i>’</p>	2		✓
<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>	<p>Adequately addressed.</p> <p>The standard development process was managed by CSA, with considerable public consultation. The standard-setting forum is the CSA SFM Technical Committee (TC).</p> <p>CAN/CSA-Z809-02 section 0.2 states that ‘<i>One-quarter of the CSA SFM Technical Committee membership consisted of timber producers, including woodlot owners, while the remainder were scientists, academics, and representatives of the provincial and federal governments, as</i></p>	2		✓

Criteria	Findings	Score	L	S
	<p><i>well as environmental, consumer, union, and Aboriginal representatives.'</i></p> <p>In reviewing the original standard in 2000, CSA '<i>strengthened the conservation representation on its SFM Technical Committee, which now includes representatives from Wildlife Habitat Canada, the Canadian Wildlife Federation, and the Ontario Federation of Anglers and Hunters.'</i></p> <p>CSA-SDP-2.1-99 states that '<i>The composition (matrix) of SSCs and TCs shall be set with the objective of ensuring that all points of view pertinent to the subject matter are represented in reasonable proportion, and that any lack of balance of representation through attrition is immediately apparent.'</i> (section 3.3.1)</p> <p>Section 3.3.3.2 identifies four interest categories: producer interest, user interest, regulatory authority and general interest. Section 3.3.3.3 states that '<i>Different description of interest categories or categories additional to the above, or both, may be required.'</i></p> <p>According to CSA application document for PEFC endorsement, the TC is broken down into four categories: Environmental &amp; General Interest, Government/ Regulatory, Industry and Academic/ Consultant.</p> <p>3.3.4 states that '<i>Balance of representation means that the actual number of voting members in any one interest category is not more than the sum of the actual number of voting members in the two smallest interest categories.'</i></p>			
<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. CAN/CSA-Z809-02 Preface, Note (3), which states that '<i>this publication was developed by consensus, which is defined by CSA Policy governing standardization –Code of good practice for standardization as “substantial agreement. Consensus implies much more than a simple majority, but not necessarily unanimity.”</i></p> <p>According to CSA application checklist for PEFC endorsement, the final document was approved unanimously by the TC 32 voting members.</p> <p>CSA directives ensure that no single interest can</p>	1		✓

Criteria	Findings	Score	L	S
	<p>dominate the process. Specifically, this is effected through the four-chamber system, and the requirement that the number of affirmative votes must be at least 50% of the total number of voting members and 2/3 of the votes cast. CSA-SDP-2.1-99 section 10.6.9.5.1 requires that <i>'A motion shall be declared carried if the affirmative vote constitutes</i></p> <p><i>a) at least two-third of the votes cast; and</i></p> <p><i>b) at least 50% of the total voting membership.'</i></p> <p>However, this decision-making rule does not ensure that the CSA TC would require agreement from a majority of each interest category.</p>			

## 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 through the following:</p> <p>SFMP Handbook specifies that <i>'A Registration Body's SFM qualification is achieved through a SCC assessment of conformance to the requirements of the Canadian National Standard System procedural documents CAN-P-14B (ISO/IEC Guide 66), CAN-P-1518, IAF Guidance on the application of ISO/IEC Guide 66 and the SFMP Handbook requirements.'</i></p> <p>The Handbook also requires that certification bodies must demonstrate conformity to ISO Guide 62 and/ or ISO Guide 66 (Section 1.2 The MSAP)</p>	2	✓	✓
2.2 Certification is undertaken by a body which is accredited to evaluate against forest management standards.	<p>Adequately addressed:</p> <p>SCC operates an SFM industry sector programme for accreditation of certification bodies to assess against Z809. Accreditation for EMS certification under CAN-P-1518 is a prerequisite. SFM is then added as a specific scope of accreditation.</p> <p>SFMP Handbook specifies that <i>'SCC formally qualifies the expertise of a Registration Body to perform CAN/CSA-Z809-2002: A Sustainable Forest Management: Requirements and Guidance registrations under the Sustainable Forest Management</i></p>	2	✓	✓

Criteria	Findings	Score	L	S
	<p><i>Industry Sector Program.</i></p> <p>In addition, CAN/CSA-Z809-02 Annex A (although not a mandatory part of the standard) A.1 states <i>'an audit undertaken by a third-party independent registrar accredited by the Standards Council of Canada.'</i></p>			
<p>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.</p>	<p>Adequately addressed:</p> <p>CAN/CSA-Z809-02 Annex A states that <i>'The audit ensures that the SFM requirements are met and includes an on-site audit of the DFA, including field inspections of forest sites.'</i> (A.1 General).</p> <p><i>'A high proportion of the audit time is spent in the DFA assessing actual forest conditions, operations, and the organisation's field interpretation and implementation of values, objectives and indicators.'</i> (A.2.3 Certification audit)</p> <p>In addition, ISO Guide 66 specifies that first stage of audit <i>'shall be based on, but not limited to, document review....Stage 2 shall take place at the location of the organization, and is the audit performed to evaluate the implementation of the organization's EMS.'</i> Additional guidance is provided by CSA PLUS 1133.</p>	2	✓	✓
<p>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>	<p>Partially addressed.</p> <p>ISO Guide 66 does not include any requirements for stakeholder consultation during the certification audit. CSA PLUS 1133 Section 6.1 Audit Objectives specifies that an SFM audit should determine <i>'whether the SFM requirements have been properly implemented and maintained...'</i> but does not specifically require consultation during the certification audit.</p> <p>CAN/CSA-Z809-02 requires public participation as a component of the SFM standard:</p> <p>Section 5 Public Participation Requirements specifies requirements and rules on public participation process.</p> <p>CSA SFM Element 6.3 Public Participation: <i>Demonstrate that the SFM public participation</i></p>	1		✓

Criteria	Findings	Score	L	S
	<p><i>process is designed and functioning to the satisfaction of the participants.</i></p> <p>These requirements for public consultation must be checked during an SFM audit.</p>			
<p>2.5 A summary of the results of the certification audit (excluding confidential information) must be publicly available to interested parties.</p>	<p>Adequately addressed through the following:</p> <p>CAN/CSA-Z809-02 section 7.4.3.1 requires the organisation to</p> <p>c) <i>'make the SFM plan publicly available</i></p> <p>d) <i>make an annual report on its performance in meeting and maintaining the SFM requirements publicly available</i></p> <p>e) <i>make the results of independent certification and surveillance audit reports publicly available.'</i></p> <p>CSA PLUS 1133 Section 7.4.3 Distribution of audit report requires that <i>'The contents of the audit report are made available to the public by the auditee or in accordance with any applicable requirements.'</i></p>	2		✓
<p>2.6 There is an accessible and functioning mechanism for dealing with complaints and disputes which is open to any interested party.</p>	<p>Adequately addressed.</p> <p>CAN/CSA-Z809-02 Annex A A.2.8 Dispute resolution states <i>'Appeals, complaints, and disputes regarding an organisation's accredited certification to this Standard can be filed by any interested party, including those involved in the public participation process.'</i></p> <p>ISO Guide 66 includes requirements on dealing with complaints and disputes:</p> <p>Section 4.1.2 p: <i>have policies and procedures for the resolution of complaints, impartial and independent resolution of appeals, and disputes received from organization or other parties about the handling of certification/ registration or any other related matters.</i></p> <p>Section 4.4 Appeals, complaints and disputes also include requirements on dealing with complaints.</p>	2	✓	✓

### 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>Accreditation is undertaken by SCC. MS Handbook section 1.1 Conformity assessment requires that '<i>SCC Conformity Assessment programs operate in accordance with ISO/IEC 17011:2004 - Conformity Assessment - General requirements for accreditation bodies accrediting conformity assessment bodies. Accordingly, the SCC policies and procedures are designed to meet the impartiality, non-discriminatory and conflict of interest requirements of the standard.</i>'</p> <p>In addition, SCC is a signatory to the International Accreditation Forum (IAF) Multilateral Recognition Agreement (MLA). This provides international recognition that SCC's accreditation systems are 17011 compliant.</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>Adequately addressed.</p> <p>SCC has now (May 2006) launched an accreditation programme for PEFC Annex 4 requirements for chain of custody, open to certification bodies that are accredited for CAN/CSA Z809.</p> <p>Certification bodies that are accredited for CAN/CSA Z809 operate in accordance with the following:</p> <p>SFMP Handbook specifies that '<i>A Registration Body's SFM qualification is achieved through a SCC assessment of conformance to the requirements of the Canadian National Standard System procedural documents CAN-P-14B (ISO/IEC Guide 66), CAN-P-1518, IAF Guidance on the application of ISO/IEC Guide 66 and the SFMP Handbook requirements.</i>' The Handbook also requires that certification bodies must demonstrate conformity to ISO Guide 62 and/ or ISO Guide 66 (Section 1.2 The MSAP).</p> <p>Accreditation is undertaken by SCC. MS</p>	2	✓	✓

Criteria	Findings	Score	L	S
	<p>Handbook section 1.1 Conformity assessment requires that <i>'SCC Conformity Assessment programs operate in accordance with ISO/IEC 17011:2004 – Conformity Assessment – General requirements for accreditation bodies accrediting conformity assessment bodies. Accordingly, the SCC policies and procedures are designed to meet the impartiality, non-discriminatory and conflict of interest requirements of the standard.'</i></p> <p>In addition, SCC is a signatory to the International Accreditation Forum (IAF) Multilateral Recognition Agreement (MLA). This provides international recognition that SCC's accreditation systems are 17011 compliant.</p>			
<p>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>	<p>Adequately addressed through PEFC Technical Document Annex 4, which sets out the requirements and approaches for chain of custody: <i>'This standard specifies requirements for chain of custody which the organisation must meet if its declarations and/ or labels referring to the origin of raw material used in the products sold/ transferred is to be recognised as credible and reliable.'</i></p> <p><i>This standard specifies two optional approaches for chain of custody, namely physical separation and percentage-based methods.'</i></p>	2	✓	✓
<p>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>	<p>Adequately addressed by the following:</p> <p>PEFC Technical Document Annex 4 section 3.6:</p> <p>3.6.1 <i>'The organisation shall establish adequate measures to ensure that the certified products do not include raw material from controversial sources.'</i></p> <p>3.6.2 <i>The organisation shall require from all suppliers of the forest based raw material, which is not classified as certified raw material, at least a signed self-declaration that the supplied raw material does not originate from a controversial source. The organisation, which has signed contracts with its suppliers, shall include such a declaration in the contracts.'</i></p> <p>3.6.3 <i>The organisation shall evaluate the potential risk of procuring raw material from controversial sources and establish a sampling</i></p>	2	✓	

Criteria	Findings	Score	L	S
	<p><i>based programme of second or third party verification of the suppliers self-declarations if a high risk exists that raw material originates from controversial sources.'</i></p> <p>Controversial sources are defined as '<i>illegal or unauthorised harvesting</i>' (section 1.3 definitions)</p> <p>Specifications for Use of the CSA SFM Mark section 14.0 Controversial sources:</p> <p><i>'Products marked with the CSA SFM Mark must not contain any wood or wood raw material from illegal or unauthorised harvesting such as harvesting in forest areas protected law...Organisations shall have access to, or require from all suppliers of wood or wood raw material or purchased products at least a signed self-declaration (e.g. as part of the contract) that supplied wood or wood raw material or purchased products do not contain any wood raw material from 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 sections 2.1.3 – 2.1.6 above.</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>Adequately addressed by section 21.0 Use and misuse of the CSA SFM Mark and section 24.0 Misleading/ false claims in Specifications for Use of the CSA SFM Mark.</p>	2	✓	✓
<p>4.6 If recycled material is used</p>	<p>Adequately addressed.</p>	2	✓	✓

Criteria	Findings	Score	L	S
<p>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>PEFC Technical Document Annex 4 Appendix 1, states that <i>'The definition of the origin defined by this Appendix shall be used together with the requirements of this standard when organisation establishes a chain of custody to use the PEFC logo and/ or declarations.'</i></p> <p>Annex 4 sets out the requirements for chain of custody related to identification of origin: <i>'The organisation shall identify and verify the category of the origin of all procured raw material.'</i> (sections 2.2.1, 3.2.1).</p> <p>Neutral raw material is defined as including <i>'Recycled wood and recycled fibres'</i> which is further defined (section 1.3.15) as <i>'post consumer wood and fibres and pre-consumer byproducts'</i>.</p> <p>CSA International's Specifications for the Use of the CSA SFM Mark state that <i>'recycled wood or fibre is excluded from the determination of certification percentage. CSA International is developing a policy to make provisions for recycled wood/fibre.'</i> (Section 12.0).</p>			