

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

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

Executive Summary

Date of Current Assessment: June 2008 (published November 2008)

Anticipated Date of Next Assessment: May 2010

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, December 2002 (Updated May 2003 to reflect approval as a National Standard of Canada).

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 Application to PEFC Checklist and Reference, 29 March 2004.

Standards Council of Canada (SCC) CAN-P-1517C Management Systems Accreditation Program (MSAP) Handbook – Conditions and Procedures for the Accreditation of Organizations Certifying/ Registering Management Systems, December 2006.

SCC CAN-P-16 (verbatim adoption of ISO/IEC 17021) Conformity Assessment Requirements for Bodies Providing Audit and Certification of Management Systems. December 2006.

SCC CAN-P-1E: Accreditation of Standards Development Organisation, December 2006.

Summary of Regulations Governing Controlled Use of Chemicals and Integrated Pest Management in Canada, Created: Sept 14 2008, submitted by CSA.

1. Forest Standards

1.1. Content of standards for legal compliance

Criteria	Findings	Score	L ¹	S
1.1.1 The standard requires that the forest owner/manager holds legal use rights to the forest.	<p>Fully addressed</p> <p>CAN/CSA-Z809-02 sections 7.3.1, 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> <p>The TP interprets 7.3.4 to mean that the owner/manager must have legal use rights to the forest.</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"> • Forest management • Environment • Labour and welfare • Health & safety • Other parties' tenure and use rights 	<p>Fully addressed</p> <p>CAN/CSA-Z809-02 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</i></p>	2	✓	

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

Criteria	Findings	Score	L'	S
	<p><i>and complied with.</i></p> <p><i>b) demonstrate that Aboriginal and treaty rights have been identified and respected.</i></p> <p><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></p>			
1.1.3 The standard requires payment of all relevant royalties and taxes	<p>Fully addressed</p> <p>CAN/CSA-Z809-02 sections:</p> <p>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></p>	2	✓	
1.1.4 The standard requires compliance with the requirements of CITES.	<p>Fully addressed</p> <p>Implicitly addressed by CAN/CSA-Z809-02 section 7.3.4 Rights and Regulations.</p> <p>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.</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>Partially addressed</p> <p>The Z809 requirements for SFM are based on an FMU level interpretation of the Helsinki and Montreal intergovernmental processes. There is no international interpretation of the Montreal process requirements for use at the FMU level. This interpretation was undertaken by the Canadian Council of Forest Ministers (CCFM), an inter-provincial governmental body, for application only in Canada.</p> <p>Z809 incorporates the CCFM SFM criteria. CSA SFM elements for compliance are defined under each CCFM criterion.</p>	1		✓

Criteria	Findings	Score	L	S
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 there is considerable scope for variability in these thresholds.	1		✓
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.	Fully addressed a. CAN/CSA-Z809-02 does not contain specific requirements on impact assessments and planning to minimise impacts that are applicable to all applicants. Sections 7.3.6 Setting DFA-Specific Performance Requirements and 7.3.7 SFM Plan contain requirements on evaluation and review to minimise impacts. The legal framework relating to forest management includes requirements for forest plans to adequately assess and minimise environmental impacts. b. CAN/CSA-Z809-02 section 6 Criterion 1 Conservation of biological diversity, Criterion 3 Conservation of soil and water resources. c. The document "Summary of Regulations Governing Controlled Use of Chemicals and Integrated Pest Management in Canada, Created: Sept 14 2008" cites Canadian federal and provincial policies and legislation governing pest management and the use of pesticides. d. The document "Summary of Regulations Governing Waste Management in Canada, Created: Sept 14, 2008" cites Canadian federal and provincial policies and legislation governing the management of waste. The Panel has reviewed a sample ² of the policies and regulations cited in the two documents in (c)	2		✓

² References reviewed:

- Fact Sheet on the Regulation of Pesticides in Canada. http://www.pmra-arla.gc.ca/english/pdf/fact/fs_pestreg-e.pdf
- How Canada Compares: an International Review of Forest Policy and Legislation. The link provided in the CSA document did not work. A summary of the report was located at http://www.fpac.ca/en/resource_centre/perspectives/index.php?edit_document=1 The summary does not say anything about pesticides or integrated pest management.
- Canadian Environmental Protection Act 1999. <http://laws.justice.gc.ca/en/c-15.31/225697.html>
- Pest Control Products Act 2002. <http://laws.justice.gc.ca/en/p-9.01/281990.html>
- Alberta Code of Practice for Pesticides. <http://www.qp.gov.ab.ca/Documents/CODES/PESTICID.CFM>
- British Columbia Integrated Pest Management Act 2002. <http://www.env.gov.bc.ca/epd/ipmp/regs/index.htm>
- Ministry Environment of British Columbia. Integrated Pest Management Regulation. Summary of Requirements and Explanatory Notes for Landscape Pest Managers. February, 2008. http://www.env.gov.bc.ca/epd/ipmp/regs/require_explan_landscape/index.htm

Criteria	Findings	Score	L	S
	and (d) above. On the basis of that sample the Panel concludes that the legislation by which forest management enterprises are bound adequately covers points c. and d. of the criterion.			
<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>Partially addressed</p> <p>a. CAN/CSA-Z809-02 requirements for an SFM plan (section 7.3.7), and control of implementation & operations (section 7.4).</p> <p>b. 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. CAN/CSA-Z809-02 addresses operational procedures and controls to meet SFM requirements (section 7.4.6).</p> <p>d. CAN/CSA-Z809-02 contains requirements for training, awareness, qualifications and knowledge (section 7.4.2).</p> <p>e. 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 - ‘conserve forest ecosystem productivity and productive capacity by maintaining ecosystem conditions that are capable of supporting naturally occurring species’), there are no specific references to harvest levels. <i>Criterion 5: Sustain flows of forest benefits for current and future generations by providing multiple goods and services</i>, includes Element 5.1 requiring the forest to be sustainably managed for an ‘acceptable and feasible mix of timber and non-timber benefits’.</p> <p>The TP considered whether the following element of the standard would justify a 2: Element 5.1 - “Through the public participation process and the implementation of SFM, the organisation should address such matters as (a) timber and non-timber benefits, including ... (ii) sustainable harvest of timber and non-timber resources.” The TP concluded that the wording “should address” was not adequate to justify a score of 2.</p>	1		✓

Criteria	Findings	Score	L	S
<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>Fully addressed</p> <p>a. 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. 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>Section 7.4.7 requires the organization to establish emergency plans and procedures ... The organisation shall define the types of emergencies ... Types of emergencies could include fire ... Contingency plans should be developed for forest disturbance such as insect and disease outbreaks and blowdown.</p> <p>c. CAN/CSA-Z809-02 requirements concerning protection from unauthorised activities are implicit, although this is considered to be Fully addressed by the legal framework and interpretation of SFM elements during the public participation process.</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 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>Partially addressed</p> <p>CAN/CSA-Z809-02 section 6 CCFM Criterion 1 Conservation of biological diversity:</p> <p>a) Element 1.2 <i>Species Diversity</i> and element 1.3 <i>Genetic Diversity</i>. 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) Element 1.1 <i>Ecosystem Diversity</i>.</p> <p>c) Element 1.4 <i>Protected Areas and Sites of Special Biological Significance</i>. However, the protection of species of exceptional value is not</p>	1		✓

Criteria	Findings	Score	L	S
	explicit, and depends on local values set by the public participation process.			

1.3 Standard-setting process

Criteria	Findings	Score	L	S
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.	Fully addressed CSA is accredited as a national standards development organisation (SDO) by the Standards Council of Canada (SCC). CSA is accredited by SCC against the requirements of CAN-P-1E for standard setting. This incorporates ISO Guide 59 requirements.	2		✓
1.3.2 The standard-setting process must seek to ensure balanced representation and input from the economic, environmental and social interest categories.	Fully addressed The standard development process was managed by CSA, with considerable public consultation. The standard-setting forum is the CSA SFM Technical Committee (TC). <i>CAN/CSA-Z809-02 section 0.2 states that '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 well as environmental, consumer, union, and Aboriginal representatives.'</i> 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> 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) 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</i>	2		✓

Criteria	Findings	Score	L	S
	<p><i>of interest categories or categories additional to the above, or both, may be required.'</i> 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>According to CSA application document for PEFC endorsement, the TC was broken down into four categories: Environmental & 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>The Z809 standard is currently being revised. The new version of the standard is expected to be published by the end of 2008. For the purposes of the current revision process for Z809, Aboriginal Peoples representation has been added to the TC.</p> <p>CSA have stated that the Terms of Reference (2007) for the CSA SFM TC (responsible for the content of the revised Z809 standard) identifies a balanced matrix with minimum and maximum numbers required in each of four membership categories:</p> <p>Environmental & General Interest; Aboriginal Peoples, Governments & Regulatory Authorities Interest; Producer Interest, and; Academic & Professional Practitioners Interest.</p>			
<p>1.3.3 The standard-setting and decision-making process adopted must seek to ensure:</p> <ul style="list-style-type: none"> • No single interest can dominate the process; • No decision can be made in the absence of agreement from the majority of an interest category. 	<p>Partially addressed</p> <p>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</p>	1		✓

Criteria	Findings	Score	L	S
	<p>unanimously by the TC 32 voting members.</p> <p>CSA directives ensure that no single interest can dominate the process. Specifically, this is implemented through the interest category 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>Fully 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-16 (ISO 17021) is a prerequisite.</p>	2	✓	✓
2.2 Certification is undertaken by a body which is accredited to evaluate against forest management standards.	<p>Fully addressed</p> <p>SCC operates an SFM industry sector programme for accreditation of certification bodies to assess against Z809. Accreditation for 'Sustainable Forest Management Programme' is added as a specific scope of CAN-P-16 accreditation.</p>	2	✓	✓
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>Fully addressed</p> <p>CAN/CSA-Z809-02 Annex A states that</p> <p><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,</i></p>	2	✓	✓

Criteria	Findings	Score	L	S
	<p><i>objectives and indicators.</i>' (A.2.3 Certification audit)</p> <p>Additional guidance is provided by CSA PLUS 1133, including details relating to factors such as the audit team and audit planning.</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>Partially addressed</p> <p>ISO 17021 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 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>The TP found no evidence that the scheme includes requirements for stakeholder consultation during the certification audit to ensure that relevant issues are identified. However CPET provided evidence from a random sample of certification assessment reports that consultation had been carried out as part of certification audits.</p> <p>The TP noted that the CSA scheme provides for substantial stakeholder participation in the management planning process overall.</p>	1		✓
2.5 A summary of the results of the certification audit (excluding confidential information) must be publicly available to interested parties.	<p>Partially addressed</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>	1		✓

Criteria	Findings	Score	L	S
	<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> <p>The scheme meets the criterion of public availability but there is no evidence that it meets the conditions specified in the Guidance for a score of 2, namely that the scheme requires that: (i) the public summary of the certification audit be published on a relevant web site; or (ii) the summary must be available electronically to any interested party on request within a defined timescale.³</p>			
2.6 There is an accessible and functioning mechanism for dealing with complaints and disputes which is open to any interested party.	<p>Fully 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 17021 section 9.8 includes requirements on dealing with complaints by certification bodies, aimed at resolution and any necessary corrective action, that are required to be open to any interested party.</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	<p>Fully addressed</p> <p>Accreditation is undertaken by SCC. SCC MS Handbook section 1.1 Conformity assessment requires that '<i>SCC Conformity Assessment</i></p>	2	✓	✓

³ The TP finds the Guidance too specific in the way in which it interprets the criterion and recommended that the Guidance be revised

Criteria	Findings	Score	L	S
ISO 17011:2004 <i>Conformity assessment -- General requirements for accreditation bodies accrediting conformity assessment bodies or equivalent.</i>	<p><i>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) for environmental management systems. This provides international recognition that SCC’s accreditation systems are consistent with ISO 17011.</p>			

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>SCC launched an accreditation programme in May 2006 following PEFC Annex 4 requirements for chain of custody, open to certification bodies that are accredited for CAN/CSA Z809. PEFC Annex 4 requires compliance with ISO Guide 65.</p> <p>See also criterion 3.1.</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>Fully addressed</p> <p>PEFC Council Technical Document Annex 4 sets out the requirements and approaches for chain of custody throughout the supply chain: <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> (Section 1.1 Scope)</p> <p>The standard specifies two approaches for chain of custody, namely physical separation and percentage-based methods.</p> <p>Section 2.1.1 <i>‘The organisation applying the physical separation method shall ensure that the certified raw material is separated or clearly identifiable at all stages of the production or trading process.’</i></p>	2	✓	✓

Criteria	Findings	Score	L	S
	Section 3.1.1 The percentage based method of the chain of custody applies where certified raw material is mixed together with other raw material categories and the certified raw material cannot be clearly identified in the output products.			
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>Fully addressed</p> <p>PEFC Council Technical Document Annex 4 section 3.6 Controversial sources</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 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>Appendix 7 to Annex 4 provides requirements for the avoidance of raw materials from controversial sources outlined in section 3.6.2. These include requirements for supplier's self-declaration, risk assessment which specifies second or third party verification for high risk sources.</p>	2	✓	
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	<p>Inadequately addressed</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 1.2.3 – 1.2.6 above.</p>	0		✓

Criteria	Findings	Score	L	S
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.				
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.	Fully addressed 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.	2	✓	✓
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: <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 	Fully addressed PEFC Council Technical Document 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). Appendix 6 to Annex 4 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 covering recycled raw material.’</i> Section 3 Declarations on recycled raw material (PEFC recycled raw material): Section 3.1 Certified raw material, (i) <i>Post-consumer wood raw material and fibres procured directly from recycling facilities or collection centre</i> <i>Section 3.2 Neutral raw material. ‘Non wood based raw material (e.g. agricultural fibre and rags), starch, pigments and wood harvested from housing areas (urban wood).</i> Annex 4 – 1.3.13 defines post-consumer wood and fibres as not including sawmill or forestry residues.	2	✓	✓