

Interpretations for the SFI 2022 Standards and Rules

October 2026

Official SFI Standard Interpretations contained in this document are auditable requirements

Table of Contents

Table of Contents.....2

Process Overview.....3

Part 1: Interpretation for Section 2-SFI 2022 Management Standard.....4

Part 2: Interpretation for Section 3-SFI 2022 Fiber Sourcing Standard.....7

Part 3: Interpretation for Section 4-SFI 2022 Chain-of-Custody Standard.....9

Part 4: Interpretation for Section 5-SFI 2022 Certified Sourcing Standard.....10

Part 5: Interpretation for Section 6–Rules for use of SFI On-Product Labels and Off Product Marks.....13

Part 6: Interpretation for Section 9-SFI Standard Development and Interpretations Process.....14

Part 7: Interpretation for Section 10-SFI 2022 Audit Procedures and Auditor Qualifications and Accreditation.....15

Part 8: Interpretation for Section 11-Communications and Public Reporting.....16

Process Overview

SFI Section 9 of the SFI 2022 Standards and Rules document, outlines the process for interpretations that are necessary for consistent implementation of the SFI program requirements.

"From time to time, a formal process may be needed to interpret the SFI standards and supporting documents. As part of SFI's commitment to continual improvement of both the SFI certification process and the SFI standards, such concerns shall be submitted promptly to staff at SFI. For interpretations submitted by a SFI-certified organization or a certification body, SFI will utilize the Interpretations Committee. The Interpretations Committee shall respond within 45 days of receipt.

For more strategic or complex interpretations, SFI staff shall utilize the SFI technical work groups Sustainable Forest Management (SFM) Work Group, Fiber Sourcing Work Group, and/or the SFI Resources Committee. In these situations, the SFI Board shall approve these strategic interpretations.

It is neither the intent nor the responsibility of this process to resolve disputes arising through certification; nevertheless, through this process, SFI will provide opinions and direction to assist parties in answering interpretive questions. SFI shall maintain a record of interpretations and post all formal responses on SFI's website."

Part 1: Interpretations for Section 2 - SFI 2022 Forest Management Standard

1. Does the SFI 2022 Forest Management Standard prevent the conversion of natural forests to plantation forests?

   Yes. The SFI 2022 Forest Management Standard prevents the conversion of natural forests to plantation forests.

   The SFI 2022 Forest Management Standard does not permit the conversion of natural forests into plantation forests. This is supported by:
   - SFI's definitions of *Plantation Forest*, *Semi-Natural Planted Forest*, and *Native Forest*. Notably, SFI's definition of native forests aligns with definitions of natural forests used by other organizations.
   - Requirements within the SFI 2022 Forest Management Standard that collectively ensure planted forests are regenerated in ways that prevent them from exhibiting the characteristics of a plantation forest.

   Key SFI Definitions
   - Native: *Species of ecological communities occurring naturally in an ecological region, as neither a direct or indirect consequence of recent human activity*." (Note: A native forest therefore includes a natural forest.)

   - Plantation Forest: *A forest that includes all of the following characteristics: one or two species, even age class, regular spacing, and lacks most of the characteristics of a native forest*.

     A plantation forest does not include forests planted for protection or ecosystem restoration following large-scale disturbances such as fires, insect outbreaks, natural disturbance, or windthrow. Additionally, forests established through planting or seeding that, at stand maturity, resemble or will resemble a native forest cover type are not considered plantations. See definition for "Semi-Natural Planted Forest."

   - Semi-Natural Planted Forest: *A semi-natural planted forest includes many of the characteristics of native ecosystems. Forests established through planting or seeding that, at stand maturity, resemble or will resemble a native forest cover type are considered planted forests, and are not considered plantations. Additionally, a semi-natural planted forest includes forests planted for protection or ecosystem restoration following large-scale disturbances such as fires, insect outbreaks, natural disturbance, or windthrow.*

     Both semi-natural planted forests and native forests exhibit a history of human disturbance (e.g., harvesting or other silvicultural activities). Semi-natural

planted forests are composed of trees established through planting and/or deliberate seeding. Native forests can be composed of trees established through natural regeneration as well as planting and/or seeding.

SFI 2022 Forest Management Standard Requirements

There are several indicators (outlined below) in the SFI 2022 Forest Management Standard that prevent the conversion of native forests into plantation forests. These include prompt reforestation using ecologically appropriate and native species, the identification and protection of important wildlife habitat elements, and the maintenance of a diversity of native forest cover types.

Additionally, the SFI 2022 Forest Management Standard has multiple Objectives, Performance Measures, and Indicators which collectively ensure forests are regenerated in a way that they do not exhibit the characteristics of a plantation forest and instead resemble a native forest or semi-natural planted forest at the time of maturity.

Specific SFI 2022 Forest Management Standard requirements to prevent the conversion of a natural forest to a plantation forest include:

- Prior to harvest, Indicator 1.1.1 requires that stands are surveyed by resource professionals such as foresters, biologists, and ecologists to identify amongst other features, the range of tree and plant species and stand level wildlife habitat elements present in the stand.
- Where trees species are identified that are not ecologically appropriate, Indicator 1.2.1 allows their replacement with an ecologically appropriate species thereby maintaining native forest cover types and ecological function. (An example would be replacing a stand of sand pine, planted extensively along the US Gulf coast for erosion prevention in the 1940s & 50s, with longleaf pine which is the more ecologically appropriate species, and which historically occupied these sites).
- Following the assessment from Indicator 1.2.1, Performance Measure 2.1 ensures that an ecologically appropriate range of species (native or naturalized species) is either left on the site post-harvest (hardwood streamside management zones for example) or re-established promptly after harvest thereby avoiding the creation of plantation forests. Regenerated stands retain or quickly regrow their herbaceous understory and varying species of woody plants on site as described below which results in more than two species existing in a forest.
- Indicator 4.1.2 requires that certified organizations identify wildlife habitat elements existing in the stand that are to be protected during harvest. This includes standing dead trees, stumps, burrows or mounds, nest trees, and den trees. This inventory ensures that these attributes are present in the stand post harvest reducing the characteristics of a plantation forest which are typically devoid of these elements.

- SFI-certified organizations must implement a program, which is audited by their certification body, that supports the diversity of native forest cover types and age or size classes that enhances biological diversity at the landscape or ownership level as required by Indicator 4.1.3.

As a reminder, all requirements in the SFI standard are third-party audited by accredited, independent, and competent certification bodies. (May 2025)

2. Does the same cut-off date (December 31, 2020) for the prohibition on conversion of natural forests to forest plantations also apply to the conversion of native non-forested ecosystems to forest plantations or other land uses?

   Yes. any native non-forested ecosystems, within the scope of an SFI 2022 Forest Management certificate as per the requirements of the SFI 2022 Forest Management Standard, shall not be converted to forest plantations or other land uses after December 31, 2020. Non-forested ecosystem is defined as not meeting SFI's definition of a *forest*. (July 2026)

Part 2: Interpretations for Section 3 - SFI 2022 Fiber Sourcing Standards

1. Can *certified organizations*, for the purpose of defining applicable "regions" for their fiber sourcing areas, determine at what level they aggregate the Forest Inventory and Analysis (FIA) conversion data when conducting their fiber supply analysis?

   Yes, Performance Measure 11.2 in the SFI 2022 Fiber Sourcing Standard requires *certified organizations* to conduct a risk assessment individually, and/or through cooperative efforts involving *SFI Implementation Committee*," at the regional level unless risk is consistent at the national level.". This assessment can include determining the level at which they aggregate the FIA conversion data. These levels could be at the FIA region, FIA sub-region, FIA state, FIA survey unit, or the USDA Resource Planning Act (RPA) assessment regions or subregions provided that such aggregation does not compromise the validity of the data (consultation with the provider of source data is recommended). Note that a FIA survey unit is a state or substate region with sufficient forest area and measured FIA plots to obtain specified levels of precision. The FIA survey units are defined as aggregates of counties. In addition to use of FIA data or credible published reports based on FIA data, *certified organizations* can use the USDA Resource Planning Act assessment regions, subregions, or other credible data sources or processes that are based on *best scientific information*. (October 2022)

2. *Conversion sources* are defined as "roundwood and/or chips produced from conversion of forestland to other land uses resulting in regional forest area decline."

   Do *conversion sources* include fiber originating from lands that have been subject to natural disasters (e.g., wildfire, hurricane, etc.) resulting in the forest becoming a) non-productive for the purposes of forest management or b) reclassified under FIA to a non-forest vegetation type, such as shrub land or grassland?

   No, the definition of *conversion sources* is for conversion of forest to other land use due to direct, human-induced change. Fiber from forests that have been subject to natural disaster and are a) non-productive for the purposes of forest management or b) reclassified under FIA to a non-forest vegetation type, such as shrub land or grassland, or c) subject to appropriate regeneration, are not *conversion sources*. (October 2022)

3. The PEFC Chain of Custody Standard has provision for 'justifiable circumstances' that permit conversion sources be utilized by a manufacturing facility if the conversion:

   i. is in compliance with national and regional policy and legislation

applicable for land use and forest management; and
ii. does not have negative impacts on ecologically important forest areas, culturally and socially significant areas, or other protected areas; and
iii. does not destroy areas of significantly high carbon stock; and
iv. makes a contribution to long-term conservation, economic, and/or social benefits.

The FSC US National Risk Assessment Mitigation Guidance for Control Measure 4.1 (conversion to non-forest) has provisions for acceptance of conversion materials "that originate from limited and legal sources of conversion (e.g., conversion that results in conservation benefits, publicly approved changes in zoning in urban areas, etc.) and does not come from sources where the conversion threatens High Conservation Values." The guidance cites fiber from construction of a utility right of way as an example of acceptable conversion.

The FSC Canada National Risk Assessment Technical FAQ for Control Measure 4.1 (conversion to non-forest) has provision for the acceptance of conversion fiber from zones showing "significant" risk provided; i. the conversion area is exempt from a forest management plan or, ii. the area is zoned as non-forest or, iii. the organization supports promotion of integrated land management processes that aim to reduce the cumulative impact of conversion of forest to non-forest uses.

SFI's definition of *controversial sources* includes "*conversion sources* originating from regions experiencing forest area decline." If the *certified organization's* analysis determines high risk for *conversion sources*, does SFI have justified circumstances or provisions permitting primary manufacturing facilities to accept fiber from *conversion sources*?

Yes, a de minimis volume of fiber from forests converted to other land use can be accepted by a primary manufacturing facility provided the *conversion source* originates from forest activities which:
i. which are in compliance with applicable state, provincial, federal, or international laws; and
ii. do not contribute to regional declines in *habitat conservation* and species *protection*; and
iii. do not create significant adverse impacts on *Forests with Exceptional Conservation Value*, *old growth forests*, forests critical to *threatened and endangered species*, or *special sites*, *habitat conservation*, protection of species or *ecologically important* forest eco-systems.

The primary manufacturing facility shall also consider and document economic, social, and environmental impacts and benefits when determining whether to accept de minimis fiber from *conversion sources*. (October 2022)

Part 3: Interpretations for Section 4 – SFI 2022 Chain of Custody Standard

No current interpretations.

Part 4: Interpretations for Section 5 – SFI 2022 Certified Sourcing Standard

1. The *2022 Certified Sourcing Standard* at Part 3: Calculating the Certified Sourcing Claim, says that a *primary producer* must account for 100% of their *primary sources* as coming from *certified sourcing* and a *secondary producer* must account for 66% of the fiber in the products as coming from *certified sourcing*.

   The *SFI 2022 Certified Sourcing Standard*, Part 5: Certified Sourcing Definition, includes raw material sourced from the following sources confirmed by a certification body:

   i. fiber that meets the requirements of the SFI 2022 Fiber Sourcing Standard;
   ii. *pre-consumer recycled*;
   iii. *post-consumer recycled* and
   iv. *certified forest content*.

   The definition includes a reference to 'non-controversial sources' (Part 5.5) as one of the possible input components of *certified sourcing*.

   Do non-controversial sources qualify as a *certified sourcing* input and facilitate the use of the *Certified Sourcing* on-product label?

   No. Non-controversial sources of fiber do not qualify as a *certified sourcing* input. *Certified sourcing* is defined as fiber that meets the definition of *certified forest content*, and/or fiber sourced by a manufacturing facility certified to the *SFI 2022 Fiber Sourcing Standard*, and/or *pre-consumer recycled content*, and/or *post-consumer recycled content*. Furthermore, *secondary producers* cannot count fiber from non-controversial sources towards the requirement that at least two-thirds by weight of the wood or wood fiber in the product(s) or manufacturing unit as coming from *certified sourcing*. *Controversial sources* are never allowed in a product with a *certified sourcing* label or claim, and the organization should conduct a risk assessment as per Part 7 to avoid *controversial sources*.

   SFI will revise Part 5 to make clear that sources classified as *certified sourcing* are only 5.1, 5.2, 5.3, and 5.4.

   The *certified organization* shall establish adequate measures to ensure that the labeled products do not come from *controversial sources*. See Part 7 on Due Diligence System to Avoid Controversial Sources. (April 2023)

2. In the *SFI 2022 Certified Sourcing Standard*, at clause 8.6.3 b., it says the outsource contractor upon completion of the outsourced process must return materials to the *certified organization*. The *SFI 2022 Chain of Custody Standard*, however, does not have the same requirement for outsourcing, just that the SFI Chain of Custody *certified organization* must have control over all outsourced activities (Part 9: Outsourcing Agreements).

   Furthermore, the *SFI 2022 Chain of Custody Standard*, 1.2 Additional Requirements allows the *certified organization* to use its chain of custody procedures to make *certified sourcing* claims or apply the SFI *certified sourcing* label provided they satisfy the requirements of Part 3: Calculating the Certified Sourcing Claim in the *SFI 2022 Certified Sourcing Standard*.

   Are the outsourcing requirements in the *SFI 2022 Certified Sourcing Standard* intended to be the same as those in the *SFI 2022 Chain of Custody Standard* and not require materials to be returned to the *certified organization* after an outsourced process?

   Yes. The requirements in the *SFI 2022 Certified Sourcing Standard,* Part 8 Management System Requirements provide sufficient control over outsourcing and outsourced materials. An SFI 2022 Certified Sourcing *certified organization* can determine it does not need outsourced materials returned upon completion of the outsourced activity.

   Given the above interpretation, the *SFI 2022 Certified Sourcing Standard* will be edited as follows:

   Section 5 - Certified Sourcing Standard

   8.6.3 b. the materials or products covered by the certified organization's *SFI 2022 Certified Sourcing Standard* certificate are clearly identified from other materials or products. (April 2023)

3. Clause 6.2.a of the SFI 2022 Certified Sourcing Standard states:

   "When claims are communicated, the Certified Organization shall ensure that documentation of the certified products clearly states at least the following information:

   a. *Certified Organization's identification and SFI Certified Sourcing Standard or SFI Chain-of-Custody Standard certificate number,"*

   Can the *Certified Organization* also include their *SFI 2022 Fiber Sourcing Standard* certificate number as a third option of documentation?

Yes. A Certified Organization's SFI 2022 Fiber Sourcing Standard certificate number may also be used as documentation under 6.2.a of the SFI 2022 Certified Sourcing Standard, as all products within the scope of an SFI 2022 Fiber Sourcing certificate qualify for the SFI Certified Sourcing label. (October 2026)

Part 5: Interpretations for Section 6 - Rules for Use of SFI On-Product Labels and Off-Product Marks

No current interpretations.

Part 6: Interpretations for Section 9 – SFI Standard Development and Interpretations Process

No current interpretations.

Part 7: Interpretations for Section 10 – SFI 2022 Audit Procedures and Auditor Qualifications and Accreditation

No current interpretations.

Part 8: Interpretations for Section 11 – Communications and Public Reporting

No current interpretations.