



Interpretations for the SFI 2022 Standards and Rules

April 2023

Official SFI Standard Interpretations contained in this document are auditable requirements

Table of Contents

Table of Contents.....	2
Process Overview.....	3
Part 1: Interpretations for Section 2 - SFI 2022 Management Standard.....	4
Part 2: Interpretations for Section 3 SFI 2022 Fiber Sourcing Standard.....	5
Part 3: Interpretations for Section 4 – SFI 2022 Chain-of-Custody Standard.....	8
Part 4: Interpretations for Section 5 SFI 2022 Certified Sourcing Standard.....	9
Part 5: Interpretations for Section 6 - Rules for Use of SFI On-Product Labels and Off Product Marks	11
Part 6: Interpretations for Section 9 - SFI Standard Development and Interpretations Process.....	12
Part 7: Interpretations for Section 10 – SFI 2022 Audit Procedures and Auditor Qualifications and Accreditation	13
Part 8: Interpretations for Section 11 - Communications and Public Reporting	14

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 2022 Standards and its supporting documents. As part of SFI Inc.’s commitment to continual improvement of both the SFI certification process and the SFI Standards, such concerns shall be submitted promptly to the SFI Inc. Interpretations Committee by contacting staff at SFI Inc. The SFI Inc. Interpretations Committee shall respond within 45 days of receipt.

It is neither the intent nor the responsibility of the SFI Inc. Interpretations Committee to resolve disputes arising through certification; nevertheless, the committee will provide opinions and direction to assist parties in answering interpretive questions. Through this process, the SFI program shall maintain a record of opinions and concerns available to both Certified Organizations and certification bodies to assist with certification planning. SFI Inc. shall periodically review this record and, where appropriate, recommend changes for inclusion in the SFI Standards or SFI audit procedures.”

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

No current interpretations.

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.

Interpretations for the SFI 2022 Standards and Rules

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)

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.