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Process Overview

SFI Section 8 of the SFI 2015-2019 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 2015-2019 Standards and its supporting documents. As part of SFI Inc.’s commitment to continual improvement of both the SFI certification process and the SFI Standard, 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 Program Participants 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 Standard or SFI audit procedures.”

No current interpretations for Objectives 1-15.
Part 2: Interpretations for Section 3 - SFI 2015-2019 Fiber Sourcing Standards

1. We are a SFI Program Participant certified to the SFI 2015-2019 Forest Management Standard. We do not own a manufacturing facility or remanufacture round wood (saw-logs, pulp wood) but we do purchase certified and non-certified round wood for re-sale. (reference – SFI 2015-2019 Fiber Sourcing Standard Part 1.1 – Additional Requirements). We do not intend to make any SFI claims for the non-SFI certified logs we resell. Are we required to be certified to the SFI 2015-2019 Fiber Sourcing Standard?

No. If you do not own a manufacturing facility you are not required to certify to the SFI 2015-2019 Fiber Sourcing Standard. The scope of the SFI 2015-2019 Fiber Sourcing Standard applies to inputs into manufacturing facilities.

In the absence of a manufacturing facility, the action of buying and reselling logs means the organization is acting as a wood producer and therefore does not require certification to the SFI 2015-2019 Fiber Sourcing Standard provided the organization is not making a SFI claim on any wood, certified or non-certified, they buy and sell. (May 2015)
Interpretations for Section 3 - Appendix 1: Rules for Use of the SFI Certified Sourcing Label SFI 2015-2019 Fiber Sourcing Standards

1. If I am a primary producer certified to the SFI 2015-2019 Fiber Sourcing Standard (Section 3, Objectives 1-13), and 100% of the raw material is sourced from primary sources that are certified to SFI 2015-2019 Fiber Sourcing Standard (Section 3, Objectives 1-13), are there additional requirements to meet Appendix 1, specifically Part 7. Minimum Management System of Appendix 1?

No. If you are a Primary Producer and certified to the SFI 2015-2019 Fiber Sourcing Standard (Section 3, Objectives 1-13), you have met the minimum management systems requirements specified in Part 7 of SFI 2015-2019 Fiber Sourcing Standard Appendix 1: Rules for Use of SFI Certified Sourcing Label. (March 2015)

2. If I am a primary producer and source more than 5% of the raw material from secondary sources (the remaining raw material is from primary sources that are certified to the SFI 2015-2019 Fiber Sourcing Standard's requirements), are there additional requirements to meet Appendix 1, specifically Part 6. Due Diligence System to Avoid Controversial Sources as well as Part 7. Minimum Management System of Appendix 1?

Yes. If more than 5% of the raw materials are sourced from secondary sources you will need to meet Part 6. Due Diligence System to Avoid Controversial Sources as well as Part 7. Minimum Management System of Appendix 1. (March 2015)

3. If I am a secondary producer am I obligated to meet all of the requirements (except those referencing primary producers) in SFI 2015-2019 Fiber Sourcing Standard - Appendix 1 to use the SFI Certified Sourcing label?

Yes. A secondary producer must meet all the requirements in SFI 2015-2019 Fiber Sourcing Standard - Appendix 1 except those referencing primary producers in order to use the SFI Certified Sourcing label. This includes Part 6. Due Diligence System to Avoid Controversial Sources as well as Part 7. Minimum Management System of Appendix 1. (March 2015)

4. The SFI 2015-2019 Fiber Sourcing Standard, Appendix 1 (Part 6) requires SFI certified organizations to have a due diligence system to avoid controversial sources. Part 6.3.1, is specific to conducting a risk assessment of forest-based products that are not in compliance with applicable state, provincial or federal law. Part 6.3.1 states “the risk assessment shall be carried out at the national level and where risk is not consistent, at the appropriate regional level.” This clause is not found in the risk assessment for forest-based products from illegal logging (Part 6.3.2) and forest-based products from areas without effective social laws (Part 6.3.3). Is the intent to also carry out the risk assessment at the national level and where risk is not consistent, at the appropriate regional level for Parts 6.3.2 and 6.3.3?

For reference the definition of controversial sources in Part 6.1 is:
Interpretations for the SFI 2015-2019 Standards and Rules

a. Forest-based products that are not in compliance with applicable state, provincial or federal laws, particularly as they may relate to:
   - conversion sources;
   - legally required protection of threatened and endangered species;
   - requirements of CITES (The Convention on International Trade in Endangered Species of Wild Fauna and Flora);
   - legally required management of areas with designated high environmental and cultural values;
   - labor regulations relating to forest worker and Indigenous Peoples’ property, tenure and use rights

b. Forest-based products from *illegal logging*

c. Forest-based products from areas without effective social laws addressing the following:
   - workers’ health and safety;
   - fair labor practices;
   - *Indigenous Peoples’* rights;
   - anti-discrimination and anti-harassment measures;
   - prevailing wages and
   - workers’ right to organize.

*Yes.* The intent is to carry out the risk assessment of all *controversial sources* at the national level and where risk is not consistent, at the appropriate regional level. This includes both forest-based products from *illegal logging* (Appendix 1 - Part 6.3.2) and forest-based products from areas without effective social laws (Appendix 1 - Part 6.3.3).

As similar requirements are found in the SFI 2015-2019 Chain of Custody Standard, this interpretation also applies to the SFI 2015-2019 Chain of Custody Standard - Parts 4.3.2 and 4.3.3. (May 2015)

No current interpretations.
Part 4: Interpretations for Section 5 - Rules for Use of SFI On-Product Labels and Off-Product Marks

No current interpretations.
Part 5: Interpretations for Section 9 – SFI 2015-2019 Audit Procedures and Auditor Qualifications and Accreditation

No current interpretations.