



***SFI ~~2015-2019~~2022 Audit Procedures and  
Auditor Qualifications and Accreditation  
(Section 109)***

**May 1, 2020**

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## Introduction

All certification, recertification and surveillance audits to Sections 2, ~~and 3, 4 and 5~~ in the *SFI 202215-2019 Standards and Rules* document shall be conducted by *certification bodies* accredited by the ANSI-ASQ National Accreditation Board (ANAB) or the Standards Council of Canada (SCC) to conduct *SFI certification*.

~~All certification, recertification and surveillance audits to Section 3—Appendix 1: Rules for Use of SFI Certified Sourcing Label and Section 4 in the SFI 2015-2019 Standards and Rules shall be conducted by certification bodies accredited by the American National Standards Institute (ANSI) or the Standards Council of Canada to conduct SFI certifications.~~

Information related to the accreditation process can be found on the websites of ANSI-ASQ National Accreditation Board ([www.anab.org](http://www.anab.org)), the American National Standards Institute ([www.ansi.org](http://www.ansi.org)) or the Standards Council of Canada ([www.scc.ca](http://www.scc.ca)).

Accredited *certification bodies* that provide certification services for *SFI* Sections 2 and 3 are required to maintain audit processes and conduct audits consistent with the requirements of:

- International Organization for Standardization (ISO) 17021:2015~~±~~ (Conformity assessment – Requirements for bodies providing audit and certification of management systems; and
- ISO TS 17021-2 (Part 2: Competence requirements for auditing and certification of environmental management systems).

Accredited *certification bodies* that provide certification services for *SFI* Section 4 and Section 5 ~~3—Appendix 1: Rules for Use of SFI Certified Sourcing Label and Section 4~~ are required to maintain audit processes and conduct audits consistent with the requirements of ISO 17065:2012 (Conformity assessment – Requirements for bodies certifying products, processes and services).

ISO is a worldwide federation of national standards bodies. The preparation of International Standards is conducted by ISO technical committees.

The ISO 17021:2015~~±~~, ISO TS 17021-2 and ISO 17065:2012 standards were prepared by the ISO Committee on Conformity Assessment (CASCO).

### 1. Scope

This *SFI Audit Procedures and Qualifications* document is intended to support, but not replace the audit process requirements contained in ISO 17021:2015~~±~~, ISO 17021-2 and ISO 17065:2012, by providing specific requirements to *SFI Program Participants Certified Organizations* and *certification bodies*. It is applicable to all forest management, *fiber sourcing* organizations and chain of custody *certified organization*, when conducting *third-party certification*, recertification, or surveillance audits to the *SFI 202215-2019 Standards* Sections 2, ~~3, and 4~~ and 5 *Standards*.

### 2. Normative Reference

*Certification bodies* and *auditors* conducting third-party audits to *SFI* Sections 2 and 3 in the *SFI 202215-2019 Standards and Rules* document must conform to the requirements of ISO

17021:2015~~1~~ and ISO TS 17021-2, while those conducting third-party audits to *SFI* Section ~~4-3~~ and Section 5—Appendix 1: Rules for Use of *SFI Certified Sourcing Label* and Section 4 must conform to the requirements of ISO 17065:2012. In addition, all *certification bodies* and *auditors* conducting third-party audits to *SFI* Sections 2, 3, ~~or 4~~ or 5 in the *SFI 202215-2019 Standards and Rules* document must conform to all applicable ANAB, ~~ANSI~~ or SCC and requirements and International Accreditation Forum (IAF) Mandatory Documents (e.g., IAF MD 1, ~~IAF MD 4~~, IAF MD 5, IAF MD 11, etc.).

### 3. Terms and Definitions

Definitions of terms can be found in the Section 13 of the *SFI 202215-2019 Standards and Rules* document.

### 4. Procedures for Implementing the Principles for *SFI* Auditing

ISO 17021:2015~~1~~ Section 4 addresses general *principles* associated with auditing, including impartiality, competence, responsibility, openness, confidentiality and responsiveness to complaints.

All information and documents, including working drafts and reports, shall be considered confidential. *Certification bodies* shall not release any information or documents without the prior written permission of the ~~Certified Organization~~*Program Participant*. *Auditors* shall conduct themselves in a professional and ethical manner.

*Certification bodies* and *audit team* members and their employers shall not participate in an appraisal or advise a potential purchaser or broker a purchase of property audited within the prior three years without the written permission of the audited party. *Certification bodies*, *audit team* members, and employers shall notify the audited party of participation in such activities after the three-year period immediately upon initiation of such activities for a period of at least 10 years following the audit.

Prior to engaging in an audit and the ~~Program Participant's~~*Certified Organization's* acceptance of the *audit team*, the *certification bodies* and *audit team* members shall disclose to the party requesting the audit any prior land appraisal or assessment work or land brokerage activity or other professional services they or their employers conducted related to the property to be audited.

*Certification bodies* must successfully complete annual witness audits and periodic re-accreditation audits to maintain their accreditation status from ANAB or SCC.

### 5. *SFI* Audit Activities

#### 5.1 Initial Certification

For the initial certification audit to be completed, the auditee must be an ~~*SFI Certified Organization*~~*Program Participant* or be in the process of becoming one in which case the final certification decision is conditioned on becoming a ~~*Certified Organization*~~*Program Participant*. The *SFI* certificate(s), *Forest Management Standard*, *Fiber Sourcing Standard*, ~~or~~ *Chain of Custody Standard* or *Certified Sourcing Standard* cannot be issued

by the *certification body* until the applicant has become an *SFI Program Participant*. It should be noted that the *SFI 202215-2019 Standards and Rules* is a publicly available document and, as such, anyone who wants to can offer their "opinion" on an organization's conformance to it. However, because "Sustainable Forestry Initiative" and "SFI" are registered service marks, an entity would infringe on this ownership in violation of the federal intellectual property laws if they were to use the service marks in a public claim about the "opinion" without becoming an *SFI Certified Organization/Program Participant*.

## 5.2 Certification of Multiple Sites

ISO 17021: 2015<sup>51</sup> clause 9.1.5 specifies that where multi-site sampling is utilized for the audit of a client's management system covering the same activity in various locations, the *certification body* shall develop a sampling *program* to ensure proper audit of the management system. The rationale for the sampling plan shall be documented for each client.

International Accreditation Forum Mandatory Document 1 (IAF MD 1) provides mandatory guidance for the consistent application of [ISO 17021:2015](#) Clause 9.1.5 that is subject to the specific requirements of relevant standards.

Within the context of the *SFI Sections 2 and 3 SFI 202215-2019 Standards* and specific risks associated with certification of *forestry operations*, *Certification bodies* may apply alternative sampling approaches to IAF MD 1 in certain circumstances.

Additional information regarding multi-site certification (including the circumstances under which alternative sampling approaches to IAF MD-1 is permissible) is included in Appendix 1 of Section [109](#) in the *SFI 2022 Standards and Rules* document.

## 5.3 Substitution and Modification of *SFI 202215-2019 Sections 2 and 3 Standard Indicators*

*Program Participants/Certified Organizations*, with consent of the *certification body*, may substitute or modify *indicators* in *SFI 202215-2019 Sections 2 Forest Management Standard and SFI 2022 Section 3 Fiber Sourcing Standards* to address local conditions based on a thorough analysis and adequate justification. The *certification body* is responsible for ensuring revised *indicators* are consistent with the spirit and intent of the *SFI 202215-2019 Sections 2 and 3 Standards performance measures and indicators* and with the *principles of sustainable forestry*, and that the changes are appropriate for specific local conditions and circumstances and the *Program Participant's/Certified Organization's* scope of operation.

Additional *indicators* beyond those identified in the *SFI 202215-2019 Sections 2 and 3 Standards*, if included by the *Program Participant*, shall be audited like all other *indicators*.

## 5.4 Determination of Conformance

**5.4.1** The *certification body* shall assess conformance to each element of the *SFI 2022-2019 Sections 2 and 3 Standards' objectives, performance measures and indicators* within the scope of the audit. *SFI 2022-2019 Standards'* elements are *objectives, performance measures and indicators*. The introduction (Section 1) to the *SFI 2022-2019 Standards and Rules* document is informative, and as such, is not an auditable element.

Evidence shall be compiled by examining operating procedures, materials relating to *forestry* practices and on-the-ground field performance, and through meetings or correspondence with employees, contractors and other third parties (e.g., government agencies, community groups, affected *Indigenous Peoples, conservation organizations*), as appropriate, to determine conformance to the *SFI 2022-2019 Forest Management Standard and the SFI 2022-2019 Fiber Sourcing Standard*.

**5.4.2** The *certification body* shall assess conformance to each element of the *SFI 2022-2019 Chain of Custody Standard and SFI 2022 Certified Sourcing Standard* requirements within the scope of the audit. The preface to the *SFI 2022-2019 Chain of Custody Standard and SFI 2022 Certified Sourcing Standard* is informative, and as such, is not an auditable element.

**5.4.3** The *certification body* shall ensure that the audit *objectives* and scope as well as the *auditor* time allocated to the audit:

- allow for accurate determination of conformance for the operating units within the scope of the audit;
- verify that the *SFI 2022-2019 Standards Sections 2 and 3 programs* conform to *SFI principles, policies, objectives, performance measures, indicators*, and any additional *indicators* that the *Certified Organization/Program-Participant* chooses; and
- verify whether the *Certified Organization/Program-Participant* has effectively implemented its *SFI 2022-2019 Standards Sections 2 and 3 program* requirements on the ground and *SFI 2022-2019 Chain of Custody Standard of SFI 2022 Certified Sourcing Standard program* requirements.

If a *major nonconformity* is found, a certificate of conformance shall not be issued until the *certification body* verifies that corrective action approved by the *lead auditor* has been implemented. A revisit may be required to verify implementation of corrective actions.

If a *minor nonconformity* is found, a certificate of conformance may be issued only after the *lead auditor* approves a corrective action plan that addresses the nonconformity within an agreed-upon period, not to exceed one year. Verification that the corrective action has been effectively implemented shall occur during the next surveillance audit.

For initial audits to the *SFI 2022 Chain of Custody Standard or SFI 2022 Certified Sourcing Standard*, a non-conformity found during the audit will prevent the

issue of the certificate until the certification body verifies that the corrective action is effectively implemented, in accordance with ISO 17065:2012.

Commented [SFI 1]: 2015-2019 Interpretation #2, Part 6.

## 5.5 SFI Technical Audit Report to the Program Participant

The ISO document 17021:2015~~4~~ at Section 9.4.8.1-1.0 addresses audit report contents. In addition, the SFI audit report to the ~~Certified Organization~~*Program Participant* shall cover:

- a. the audit plan;
- b. a description of the audit process used;
- c. the number of *auditor* days used to conduct the audit, including both on-site and off-site audit activities;
- d. information regarding any meetings or correspondence between the *audit team* and government agencies, community groups, affected *Indigenous Peoples* and *conservation* organizations;
- e. documentation of the rationale for the substitution or modification of any *indicators*;
- f. a schedule for surveillance and recertification;
- g. any specific focus areas for the next audit visit.

See Section 1.10 in the *SFI 2022-2019 Standards and Rules* document regarding the development and release of public summary audit reports. The public audit summary report shall be posted to the SFI website within 90 days of the certificate being issued. For surveillance audits the public summary audit report shall be posted within 90 days from the conclusion of the audit.

## 5.6 Recertification

**5.6.1** To maintain current *SFI 2022-2019 Standard* certificates, ~~Program Participants~~*Certified Organizations* shall recertify their *SFI programs* to the *SFI 2022-2019 Sections 2, 3, 4 and 5 Standards* every ~~five~~ *three* years.

~~5.6.2~~ To maintain a current Section 4 *SFI 2015-2019 Chain of Custody* certificate, ~~Program Participants~~ shall recertify their *SFI chain-of-custody program* to the *Section 4 SFI 2015-2019 Chain of Custody Standard* every five years.

## 5.7 Transferal of Certified Lands or Facilities

When one *SFI Certified Organization*~~Program Participant~~ acquires the certified forest land or facilities of another ~~Certified Organization~~*Program Participant*, the *certification bodies* shall work with the parties involved to review the acquisition or sale. This review will determine the significance of changes that may occur with the transfer of ownership of the forestland and or facilities to determine the actions necessary in order to issue a new certificate to the party receiving the new assets. It is imperative that ~~Program Participants~~*Certified Organizations* notify their respective *certification body* as soon as possible when forestland and or facilities are being purchased or sold to ensure that lapses in certification status can be eliminated or *minimized*. Refer to ISO/IEC 17021:2015 for more information.

In order to *minimize* disruptions in operations due to the transfer of certified forestlands and or facilities from one ~~certified-Certified Organization~~*Program Participant* to another, *the SFI Office of Label Use and Licensing will honor current SFI certifications for the forestlands and or facilities involved in the transfer for a period of 90 days for SFI product labeling purposes provided:*

- a. The parties involved request this grace period in writing prior to the transfer of the assets with documentation confirming that there will not be significant variation in the current operations, environmental management systems, personnel, etc. during the transfer.
- b. The party receiving the assets must provide documentation demonstrating the timeline for obtaining their new *SFI certification* from an accredited *certification body*.
- c. The party desiring to utilize the *SFI* product labels must be in full conformance with Sections 2, 3, ~~or~~ 4, 5 and Section 65 of the *SFI 2022+5-2019 Standards and Rules*.

## **6. Competence and Evaluation of Certification Bodies**

### **6.1 Qualifications of Audit Teams**

*Audit teams* shall have the competence (knowledge and skills) to conduct an audit in accordance with the *principles* of auditing. The *certification body* shall select *audit team* members appropriate to the scope, scale and geography of the operation being audited. Additionally, at least one member of the *audit team* shall have knowledge of *forestry* operations in the region undergoing the audit, at least one member shall have knowledge of applicable laws and regulations, at least one member shall have knowledge of the socio-demographics and cultural issues in the region, and at least one member shall be a professional forester as defined by the Society of American Foresters (SAF), the Canadian Institute of Forestry, or licensed or registered by the state(s) or province(s) in which the certification is conducted. For forest management audits, the *audit team* shall have expertise that includes plant and *wildlife* ecology, *silviculture*, forest modeling, forest operations, occupational safety and health, international labor standards, and hydrology. One specialist per discipline is not required to meet any of the above requirements.

### **6.2 Qualifications of Auditors**

ISO document 17021:2015~~1~~ at Section 7.1 and Section 7.2 addresses general competence requirements for *certification bodies* providing audit and certification of management. This is supplemented by the environmental management system-specific competence requirements contained in ISO 17021-2 and ISO 19011:2018 Guidelines for auditing management systems.

In addition to the competence requirements contained in ISO 17021:2015~~1~~ and ISO 17021-2 and ISO 19011:2018, for certifications to the *SFI 2022+5-2019 Standards*, *audit*

*team* members shall have the education, formal training and experience that promote competency in and comprehension of:

- a. *forestry* operations as they relate to natural resource management, including *wildlife*, fisheries, recreation, ecology, etc.;
- b. international and domestic *sustainable forestry* management systems and performance standards including occupational safety and health, and labor standards; and
- c. certification requirements related to the *SFI program*.

*Audit team* members who have obtained a professional *degree* in *forestry* or a closely related field shall have a minimum of two years' relevant work experience.

### 6.3 Maintenance and Improvement of Competence

All *audit team* members shall pursue ongoing personal and professional development in

- a. forest management science and technology;
- b. sustainable forest management systems and certification *programs* and standards;
- c. understanding and interpretation of federal, state, and provincial *forestry* and environmental laws and codes of practice; and
- d. certification procedures, processes and techniques, especially as these pertain to the *SFI 2022-2019 Standards*.

An *auditor* who maintains Certified Forester, Registrar Accreditation Board, or Canadian Environmental Certification Approvals Board sustainable forest management *auditor* (EP(EMSLA)) certification, or equivalent, shall be considered to have fulfilled continuing education requirements.

## 7. Accreditation of Certification Bodies

The *SFI program* requires *certification bodies* to be accredited in order to conduct *SFI certifications* and issue certificates.

### 7.1 Certification body

~~As~~ an independent *third party* that is accredited by:

- ~~a.~~ ANSI-ASQ National Accreditation Board (ANAB) as ~~being competent to conduct certifications to the SFI 2022 Standards Sections 2, and 3, 4 and 5 and the SFI Chain of Custody Standard Section 4 and Section 3, Appendix 1: Rules for Use of SFI Certified Sourcing Label. being competent to conduct certifications to the SFI 2010-2015 Standards Sections 2 and 3.~~
- ~~• American National Standards Institute (ANSI) as being competent to conduct certifications to the SFI 2015-2019 Chain of Custody Standard Section 4 and SFI Section 3—Appendix 1: Rules for Use of SFI Certified Sourcing Label.~~
- ~~b.~~ Standards Council of Canada (SCC) as being competent to conduct certifications to the *SFI 2015-2019/2022 Standards Sections 2, 3, 4 and 5*

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and 3 and the *SFI 2015-2019 Chain of Custody Standard* Section 4 and Section 3, Appendix 1: Rules for Use of *SFI Certified Sourcing Label*.

## Appendix 1: Audits of Multi-Site Organizations [Normative]

### Introduction

Multi-site organizations may be audited on a site-by-site basis (all sites visited each year) or, in some cases, on a sample basis.

This appendix expands on Section 5.1 of the *SFI Audit Procedures and Auditor Qualifications* and Accreditation document and provides additional normative guidance for *certification bodies* wishing to audit multi-site organizations on a sample basis.

### 1. Scope

Audits of multi-site organizations applying a sampling approach to assess conformance with:

- i. ~~The SFI 2015-2019 Standards Sections 2 and 3~~  
[Section 2 – SFI 2022 Forest Management Standard](#)
- ii. [Section 3 – SFI 2022 Fiber Sourcing Standard](#)
- iii. Section 4 - SFI 20~~22~~~~15~~-2019 Chain of Custody Standard
- iv. [Section 5 – SFI 2022 Certified Sourcing Standard](#)
- v. Section ~~6~~5 - *Rules For Use Of SFI On-Product Labels and Off-Product Marks*

### 2. References

IAF Mandatory Document for The Certification of Multiple Sites Based on Sampling Issue 1 (IAF MD1: 20~~1807~~) – (Normative for *SFI 20~~22~~~~15~~-2019 Standards Sections 2 and 3*, Informative for *SFI 20~~22~~~~15~~-2019 Standard Sections ~~4 and 5.~~*)

IAF Mandatory Document for Duration of QMS and EMS Audits Issue 1 (IAF MD 5: 20~~1509~~) – (Informative).

### 3. ~~Terms and Definitions~~

~~3.1 — Organization: The term organization is used to designate any company or other organization owning a management system subject to audit and certification.~~

~~3.2 — Site: A site is a permanent location where an organization carries out work or a service.~~

~~3.3 — Multi-Site Organization: An organization having an identified central function (hereafter referred to as a central office — but not necessarily the headquarters of the organization) at which certain activities are planned, controlled or managed and a network of local offices or branches (sites) at which such activities are fully or partially carried out.~~

~~3.4 — Group Certification Organization: A specific type of multi-site organization where forest owners, forest owners' organizations, forest managers, forest products manufacturers or forest products distributors without a pre-existing legal or contractual link can form a group for the purposes of achieving certification and gaining eligibility for a sampling approach to certification audits.~~

Commented [SFI 2]: Moved to Section 14 Definitions

## 4. Procedures for Implementing Audits of Multi-site Organizations

### 34.1 Eligibility Criteria for Multi-site Organizations

**34.1.1** Multi-site organizations using IAF-MD1 as the basis for sampling shall meet the eligibility criteria established in IAF-MD1, including but not limited to the following:

- a. The processes at all sites have to be substantially of the same kind and have to be operated to similar methods and procedures.
- b. The organization's management system shall be under a centrally controlled and administered plan and be subject to central management review and all relative sites (including the central administration function) shall be subject to the organization's internal audit *program*.
- c. It shall be demonstrated that the central office of the organization has established a management system in accordance with the ~~SFI 2022+5-2019~~ *Standards* and that the whole organization meets the requirements of the standard.
- d. The organization should demonstrate its ability to collect and analyze data (including but not limited to the items listed below) from all sites including the central office and its authority and also demonstrate its authority and ability to initiate organizational change if required:
  - i. System documentation and system changes;
  - ii. Management review;
  - iii. Complaints;

- iv. Evaluation of corrective actions;
- v. Internal audit planning and evaluation of the results;
- vi. Changes to aspects and associated impacts for environmental management systems and
- vii. Different legal requirements.

**34.1.2** A Central Function<sup>1</sup> shall be established that shall:

- a. represent the multi-site organization in the certification process, including communication and relationship with the certification body;
- b. submit an application for the certification and its scope, including a list of participating sites;
- c. ensure contractual relationship with the certification body;
- d. submit to the certification body a request for extension or reduction of the certification scope, including coverage of participating sites;
- e. establish written procedures for the management of the multi-site organization.
- f. keep records relating to the central office and sites compliance with the requirements of the standard.
- g. provide a commitment on behalf of the whole multi-site organization to establish and maintain practices and procedures in accordance with the requirements of the relevant standard;
- h. provide all the sites with information and guidance needed for effective implementation and maintenance of practices and procedures in accordance with the relevant standard;
- i. maintain the organizational or contractual connection with all sites covered by the multi-site organization including the right of the Central Function to exclude any site from participation in the certification in case of serious nonconformities with the relevant standard;
- j. keep a register of all the sites of the multi-site organization, including (for the *SFI 2015-2019 Forest Management Standard*) the forest area associated with each participating site;
- k. maintain an internal audit or monitoring *program* sufficient to ensure overall organizational conformance with the relevant standard;<sup>2</sup>
- l. operate a review of the conformity of sites based on results of internal audit and/or monitoring data sufficient to assess organizational performance as a whole rather than at the individual site level;
- m. establish corrective and preventive measures if required and evaluate the effectiveness of corrective actions taken; and
- n. establish procedures for inclusion of new sites within the multi-site organization including an internal assessment of conformity with the standard, implementation of corrective and relevant preventive measures and a requirement to inform the relevant *certification body* of changes in participation prior to including the sites within the scope of the certification.

Commented [SFI 3]: Adapted from PEFC ST 2002-2020

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<sup>1</sup> The Central Function comprises the system of processes and procedures necessary to manage the multi-site organization and is not a physical location.

<sup>2</sup> Annual performance data on overall organizational conformance implies that all sites have been internally audited, or monitored, prior to the initial audit and subsequent audit.

**34.1.3** Functions and responsibilities of individual sites shall be established for:

- a. ~~implementing and maintaining the requirements of the relevant standard;~~
- b. ~~entering into a contractual relationship with the central office, including commitment on the compliance with the standard requirements and other applicable certification requirements.~~
- c. ~~responding effectively to all requests from the Central Function or certification body for relevant data, documentation or other information whether in connection with formal audits or reviews or otherwise;~~
- d. ~~providing full co-operation and assistance in respect of the satisfactory completion of internal audits, reviews, monitoring, relevant routine enquiries or corrective actions; and~~
- e. ~~implementing relevant corrective and preventive actions established by the central office.~~

Commented [SFI 5]: Moved from 4.1.2 f. below

Commented [SFI 6]: Moved from 4.1.2 f. below

**34.1.42** Multi-Site Organizations using alternate approaches to sampling provided for in [Section 10, clause 5.24 Certification of Multiple Sites](#) of the Audit Procedures and Auditor Qualifications and Accreditation document shall meet all of the eligibility requirements specified in [Section 10: Appendix 1, clause 34.1.1 – 3.1.3](#) above. Deviation from the sampling requirements specified in IAF MD-1 is only permissible in exceptional (i.e., limited) circumstances. In addition, the following requirements must also be met:

- a. The alternate sampling approach must be accompanied by a written justification demonstrating that the same level of confidence in conformity with the *SFI 202215-2019 Standards* across all of the sites included in the certification can be obtained.
- b. A legal or contractual link shall exist between all sites.
- c. The scope and scale of activities carried out by participating sites shall be similar.
- d. The management system framework shall be consistent across all sites (allowing for site level procedures to reflect variable local factors).
- e. ~~A Central Function<sup>3</sup> shall be established that shall:~~
  - i. ~~provide a commitment on behalf of the whole multi-site organization to establish and maintain practices and procedures in accordance with the requirements of the relevant standard;~~
  - ii. ~~provide all the sites with information and guidance needed for effective implementation and maintenance of practices and procedures in accordance with the relevant standard;~~
  - iii. ~~maintain the organizational or contractual connection with all sites covered by the multi-site organization including the right of the Central Function to exclude any site from participation in the certification in case of serious nonconformities with the relevant standard;~~
  - iv. ~~keep a register of all the sites of the multi-site organization, including (for the *SFI 202215-2019 Forest Management Standard*) the forest area associated with each participating site;~~

<sup>3</sup>The Central Function comprises the system of processes and procedures necessary to manage the multi-site organization and is not a physical location.

- v. maintain an internal audit or monitoring *program* sufficient to ensure overall organizational conformance with the relevant standard;<sup>4</sup>
  - vi. operate a review of the conformity of sites based on results of internal audit and/or monitoring data sufficient to assess Organizational performance as a whole rather than at the individual site level;
  - vii. establish corrective and preventive measures if required and evaluate the effectiveness of corrective actions taken; and
  - viii. establish procedures for inclusion of new sites within the multi-site organization including an internal assessment of conformity with the standard, implementation of corrective and relevant preventive measures and a requirement to inform the relevant *certification body* of changes in participation prior to including the sites within the scope of the certification.
- f. Functions and responsibilities of individual sites shall be established for:
- i. implementing and maintaining the requirements of the relevant standard;
  - ii. responding effectively to all requests from the Central Function or *certification body* for relevant data, documentation or other information whether in connection with formal audits or reviews or otherwise;
  - iii. providing full co-operation and assistance in respect of the satisfactory completion of internal audits, reviews, monitoring, relevant routine enquiries or corrective actions; and
  - iv. implementing relevant corrective and preventive actions established by the central office.

**4.1.3 Group certification organizations formed to achieve SFI 2015-2019**

***Standards certification, in addition to meeting either 4.1.1 or 4.1.2, shall submit all the forest area under management within the catchment area for the group certification (i.e., the group certification shall be defined in geographic terms at a logical scale such as county, region, state/province but once defined must include all sites managed by the central function within that geographic area).***

**4.1.4 Group certification organizations formed to achieve SFI 2015-2019**

***Standards certification shall establish connections with all participants based on a written agreement which shall include the participants' commitment to comply with the sustainable forest management and/or fiber sourcing standard. The Central Function shall provide all participants with information and guidance required for the effective implementation of the sustainable forest management standard and other applicable requirements of the forest certification scheme. The group entity shall have a written contract or other written agreement with all participants covering the right of the group entity to implement and enforce any corrective or preventive measures, and to initiate the***

<sup>4</sup>Annual performance data on overall organizational conformance implies that all sites have been internally audited, or monitored, prior to the initial audit and subsequent audit.

~~exclusion of any participant from the scope of certification in the event of nonconformity with the sustainable forest management standard.~~

~~4.1.5 For audits of conformance with SFI Section 4 in the SFI 2015-2019 Standards and Rules document, multi-site organizations using either IAF -MD1 or alternate approaches to sampling shall ensure that all the relevant sites (including the central function) are subject to the organization's internal audit program and shall have been audited in accordance with that program prior to the certification body starting its assessment.~~

## ~~5. SFI Multi-Site Audit Activities~~

### ~~35.21 Sampling Approaches~~

~~35.21.1 Certification bodies auditing multi-site organizations using IAF -MD1 as the basis for sampling shall meet the sample selection and intensity criteria established in IAF -MD1.~~

~~35.21.2 Certification bodies auditing multi-site organizations using alternate approaches as the basis for sampling shall meet the following minimum sample selection and intensity criteria:~~

- ~~a. stratification of the sites included within the multi-site certification based on the scope and scale of activities as well as previous audit findings, complaints and monitoring data collated by the central function;<sup>56</sup>~~
- ~~b. a formal documented evaluation of the inherent and control risks at each of the sites participating in the multi-site certification;~~
- ~~c. a sample strategy designed to specifically address the identified risks;~~
- ~~d. consideration of the need for an element of randomness within the sampling strategy to address previously unidentified risks;~~
- ~~e. in cases where the multi-site organization maintains an internal audit program determined to be reliable the minimum sample size shall in no event be less than:~~
  - ~~i.  $\sqrt{(n)}$  for initial certification audits<sup>7</sup>~~
  - ~~ii.  $0.6 \sqrt{(n)}$  for surveillance audits~~
  - ~~iii.  $0.8 \sqrt{(n)}$  for re-certification audits~~
- ~~f. In cases where there the multi-site organization does not maintain an internal audit program determined to be reliable the minimum sample size shall in no event be less than  $\sqrt{(n)}$  for initial certifications, surveillance audits and re-certification audits; and~~

Commented [SFI 7]: Incorporated into new Appendix 2 – Audits of Group Certification Organizations

<sup>5</sup> For example in a multi-site organization with three forest management operations and 15 procurement operations at a minimum, separate strata would be required for the woodlands and procurement operations. Under SFI 20215-2019 Sections 2 and 3, a range of processing facilities may be included under a single stratum to the extent that the nature and risks associated with the fiber supply are consistent across the facilities e.g., three sawmills a plywood mill and a pulp mill may be included within a single stratum if they are all using fiber with a similar risk profile (such as from a single state/province/region). If one of the sawmills imported tropical hardwoods, it would require a separate stratum.

<sup>6</sup> In determining the impact of previous audit findings on a sample strategy consideration shall be given to both the need to formally close out prior audit findings (which may require a site visit) and the implications of previous audit findings for ongoing conformance with the applicable standard(s) by individual sites.

<sup>7</sup>Where n = the number of sites within the stratum.

- g. In addition to site audits, the central function shall be audited on an annual basis.<sup>8</sup>

### **35.32 Audit Scope**

- 35.32.1** At a minimum the audit sampling process shall address all elements of the standards on an:
- Annual basis for surveillance audits of conformance with *SFI* Sections 2, 3, and 4 and 5 of the *SFI 2022-15-2019 Standards and Rules* document.
  - ~~Every five years Triennial basis~~ for re-certification audits of conformance with the *SFI* Section 2, 3, 4 and 5 of the *SFI 2022-15-2019 Section 2 and Section 3 Standards and Rules*.
  - ~~Quinquennial basis for re-certification audits of conformance with the *SFI 2015-2019 Chain of Custody Standard*.~~

### **35.43 Audit Duration**

- 35.43.1** In determining the overall duration of multi-site audits the underlying objective is to maintain at least the same level of confidence that would be achieved under IAF MD1. When calculating audit days, consideration should be given to the general principles guiding audit time calculations outlined in ISO 17021:2011 Section 9.1.4 Determining audit time, IAF-MD5 and (for audits of integrated management systems) IAF MD11.

### **35.54 Nonconformities**

- 35.54.1** Nonconformities identified at the site or organizational level shall be addressed by the central function considering both the site level implications and the broader implications for the organization as a whole.
- 35.54.2** If a *major nonconformity* is found, a certificate of conformance shall not be issued until the *certification body* verifies that corrective action approved by the *lead auditor* has been implemented at both the site level and for the organization as a whole.
- 35.54.3** *Certification bodies* shall close out identified *minor nonconformities* at the next scheduled audit. This may require an amendment to the site sampling strategy to ensure that open site-level nonconformities are closed out at the next audit.<sup>9</sup>

### **35.65 Audit Reporting**

<sup>8</sup>Auditing of the central function will be primarily based on interviews, document and record review and may be conducted through any combination of off-site audit activities, additional activities carried out through electronic record access at individual sites or visits to the central office as appropriate.

<sup>9</sup> For example, where Operation A has a *minor nonconformity* raised in 2022-15, it will be necessary to close this out in 2023-16 regardless of whether Operation A was scheduled to be one of the sites sampled in 2023-16. As a result, the sampling strategy will need to include a process for closing out open site-level nonconformities.

**35.65.1** At a minimum, the *certification body* shall prepare a technical audit report that addresses the multi-site organization as a whole. Individual site level reports may be developed to summarize site level findings but do not eliminate the need for an organizational level report.

### **3.7 Expanding the Scope of a SFI 2022 Chain of Custody Standard or SFI 2022 Certified Sourcing Standard Certificates**

**3.7.1** Additional sites may be added by the *certification body* to an existing certificate between audits provided it is within the scope of the certificate. The number of sites that may be added between audits is limited to 100% of the existing sites at the previous audit. The following requirements shall be met:

- a. the *certification body* shall be informed by the *certified organization* in advance of its intent to add new sites between audits, including the number of sites to be added;
- b. the *certification body* shall obtain from the *certified organization* the system procedures covering the additional sites, including the products covered by the scope of the certificate;
- c. the *certification body* shall obtain the internal audit report for the site(s) being
  - i. considered for inclusion in the certificate;
- d. the *certification body* shall review results of the internal audit and determine if additional information is needed while considering the request of the *certified organization*;
- e. based on the result of the review in (d), the *certification body* shall determine if an on-site audit of the additional site(s) is required or if the review as per (b), (c) and (d) shows sufficient evidence that the sites can be added;
- f. if an on-site audit is not required before adding the additional site(s) to the certificate, these new site(s) shall be subject to on-site visit no later than the next scheduled audit, and
- g. in case where remote audits are permitted, the on-site audit can be replaced by a remote audit provided:
  - i. audit of organizations that operate without physical possession are conducted remotely with the use of information and communication technology (ICT) tools in accordance with IAF MD 4.
  - ii. The certification body shall demonstrate that the full scope of the audit can be covered using ICT tools.
  - iii. organizations that operate with physical possession but have not sold any physical product with a SFI claim since the previous audit, are not eligible to be audited remotely according to this requirement.

## **46. Competence and Evaluation of Certification Bodies**

**Commented [SFI 8]:** 2020 Interpretation No.6 , from Part 6 of Interpretation document.

Adapted from clause 7.4.6, PEFC ST 2003-2020 *Requirements for Certification Bodies operating Certification against the PEFC International Chain of Custody Standard*

**46.1** Prior to conducting multi-site certification under the methodologies described in this appendix *certification bodies* shall have documented procedures in place to guide *audit teams* in the planning, conduct and reporting of multi-site certification audits.

## **57. Public Communication and Claims Regarding Multi-Site Certificates**

**57.1** For audits of the *SFI 2022-15-2019* Section 2 and Section 3 requirements, *certification bodies* shall prepare a summary audit report that, in addition to the requirements of *SFI Communications and Public Reporting* (Section 1.10) in the *SFI 2022-15-2019 Standards and Rules* document, indicates:

- a. the fact that the certification is a multi-site certification;
- b. whether the multi-site organization is a group certification organization;
- c. the sampling approach (strata, location, number of sites sampled and the percentage of sites sampled within each stratum); and
- d. any changes in the scope of the multi-site certification since the last public summary report.

**57.2** Certificates issued to multi-site organizations shall be issued to the central function and include an appendix listing the participating sites. The central function shall provide a copy of the certificate to all participating sites. The certificate shall list all participants.

## **68. Interpretations, Public Inquiries and Official Complaints**

**68.1** In assessing the validity of complaints raised in relation to a specific site within a multi-site organization, *certification bodies* shall investigate the complaint at the site level and (where relevant) at the organizational level.<sup>10</sup>

**Commented [SFI 9]:** This section does not address interpretations or public inquiries.

<sup>10</sup> For example, where a complaint has implications for the effectiveness of a process carried out by the central function (such as procedures, monitoring or internal audit) then the implications for the reliability of information from other sites within the organization shall also be considered.

## **Appendix 2: Audits of Group Certification Organizations** **[Normative]**

### **1. Scope**

Audits of group certification organizations applying a sampling approach to assess conformance with:

- i. Section 2 - SFI 2022 Forest Management Standard
- ii. Section 3 - SFI 2022 Fiber Sourcing Standard
- iii. Section 4 - SFI 2015-2019 Chain of Custody Standard
- iv. Section 5 – SFI Certified Sourcing Standard
- v. Section 6 - Rules for Use Of SFI On-Product Labels and Off-Product Marks

### **2. References**

IAF Mandatory Document for Duration of Quality, Environmental and Occupational Health and Safety Management Systems (IAF MD 5: 2019) – (Informative).

### **3. Group Certification Organizations**

**Commented [SFI 10]:** Requirements adapted from PEFC ST 1002-2018 Group Forest Management Certification.

**3.1** Group certification organizations formed to achieve SFI 2022 Standards certification shall meet the requirement for the group manager (central function) in 3.3.1 and the group members in 3.3.2 below. Group certification organizations formed to achieve SFI 2022 Forest Management Standard certification, shall submit all the forest area under management within the catchment area for the group certification (i.e., the group certification shall be defined in geographic terms at a logical scale such as county, region, state/province but once defined must include all sites managed by the central function within that geographic area). All participants in the group certification organization shall be subject to the internal monitoring and the internal audit program.

### **3.2 Commitment and policy**

- 3.2.1** The group certification organization shall require a commitment:
- a. to comply with standard requirements and other applicable requirements of the certification system;
  - b. to integrate the group certification requirements in the group management system;
  - c. to continuously improve the group management system;
  - d. to continuously support the improvement of the sustainable management of the land/forests by the group members of a forest management group certification organization.

The commitment may be part of a group management policy and shall be publicly available upon request.

- 3.2.2** Members in the group certification organization shall provide a commitment
- a. to follow the requirements of the management system;
  - b. to implement the requirements of the standard in their operations or facilities.

### **3.2.3 Organizational roles, responsibilities and authorities for the Group Certification Organization**

#### **3.3.1** Functions and responsibilities of the Group Manager

The following functions and responsibilities of the group manager shall be specified:

- a. implement and maintain an effective management system covering all members of the group;
- b. represent the group certification organization in the certification process, including in communications and relationships with the certification body, submission of an application for certification, and contractual relationship with the certification body;
- c. establish written procedures for the management of the group certification organization;
- d. establish written procedures for the acceptance of new group

- members of the group certification organization. These acceptance procedures shall cover at least the verification of the applicant's information about contact details, clear identification of their forest property and its/their size(s);
- e. establish written procedures for the suspension and exclusion of group members who do not correct/close nonconformities. Group members excluded from any certification group based on nonconformities cannot be accepted within 12 months after exclusion;
  - f. keep documented information of:
    - i. the group manager and group members' conformity with the requirements of the standard,
    - ii. all group members, including their contact details, identification of their forest property and its/ their size(s) (for forest management group certification organizations),
    - iii. the certified area (for forest management group certification organizations),
    - iv. the implementation of an internal monitoring program, its review and any preventive and/or corrective actions taken;
  - g. documented information relevant to the group management system and the conformance with the requirements of the standard shall be up to date and adequately protected against loss of confidentiality, improper use, or loss of integrity.
  - h. establish connections with all group members based on a binding written agreement which shall include the group members commitment to comply with the standard. The group manager shall have a written contract or other written agreement with all group members covering the right of the group manager to implement and enforce any corrective or preventive measures, and to initiate the exclusion of any participant from the scope of certification in the event of nonconformity with the standard;
  - i. provide all group members with a document confirming participation in the group certification organization,
  - j. provide all group members with information and guidance required for the effective implementation and maintenance of the standard;
  - k. address nonconformities reported from group members which were identified under other certifications than the particular group certification organization and to ensure implementation with all group members;
  - l. operate an internal monitoring program that provides for the evaluation of the group managers' conformity with the certification requirements;
  - m. operate an annual internal audit program covering both group members and group manager;
  - n. operate a management review of the group certification organization and acting on the results from the review;

- o. provide full co-operation and assistance in responding effectively to all requests from the *certification body*, accreditation body for relevant data, documentation or other information; allowing access to the forest area covered by the *group certification organization* and/or other facilities, whether in connection with formal audits or reviews or otherwise related or with implications for the management system;
- p. maintain appropriate mechanisms for resolving complaints and disputes relating to group management and the standard requirements.

### **3.3.2 Function and responsibilities of *Group Members***

The following functions and responsibilities of the *group members* shall be specified:

- a. to provide the *group member* with a binding written agreement, including a commitment on conformity with the standard requirements and other applicable requirements of the certification system; *group members* excluded from any certification group cannot apply for group membership within 12 months after exclusion;
- b. to provide the group manager with information about previous group participation;
- c. to comply with the standard and other applicable requirements of the certification system as well as with the requirements of the management system;
- d. to provide full co-operation and assistance in responding effectively to all requests from the group manager, or *certification body* for relevant data, documentation or other information; allowing access to the forest and/or facilities, whether in connection with formal audits or reviews or otherwise related or with implications for the management system;
- e. to inform the group manager about nonconformities identified under other certifications than the particular *group certification organization*;
- f. to implement relevant corrective and preventive actions established by the group manager.

## **4. Evaluating the Group Certification Organization Performance**

### **4.1 Internal Audit**

**4.1.1** The annual internal audit program shall provide information on whether the *group certification organization's* management system:

- a. conforms to the *group certification organization's* own requirements for its group management system and the requirements of the certification standard;
- b. ensures the implementation of the standard requirements at the *group member* level;
- c. is effectively implemented and maintained.

4.1.2 The internal audit program shall cover the group manager and all *group members*. The group manager shall be audited annually. The *group members* may be selected on a sample basis.

## **4.2 Nonconformity, corrective and preventative action**

4.2.1 When a nonconformity occurs, the group manager shall implement corrective action and mitigate the impacts to the extent possible;

4.2.2 The group manager shall evaluate the need for preventative action to eliminate the causes of the nonconformity by:

- a. reviewing the nonconformity;
- b. determining the causes of the nonconformity;
- c. determining if similar nonconformities exist, or could potentially occur;
- d. implement any action needed;
- e. review the effectiveness of any corrective action taken;
- f. make changes to the group management system, if necessary.

4.2.3 The group manager shall retain documented information as evidence of:

- a. the nature of the nonconformities and any subsequent actions taken;
- b. the results of any corrective action.

4.2.4 A *group member* who was excluded from a group certification organization shall be internally audited by the group manager before they are allowed to re-enter the *group certification organization*. The internal audit shall not take place sooner than 12 months after the exclusion.

## **4.3 Management review and Continual Improvement**

4.3.1 An annual management review shall at least include:

- a. the status of actions from previous management reviews;
- b. changes in external and internal issues that are relevant to the *group certification organization's* management system;
- c. the status of conformity with the sustainable forest management standard, that includes reviewing the results of the internal monitoring program the internal audit and the *certification body's* evaluations and surveillance;
- d. information on the *group certification organization's* performance, including trends in:
  - i. nonconformities and corrective actions;
  - ii. monitoring and measurement results;
  - iii. audit results;
- e. opportunities for continual improvement.

4.3.2 The outputs of the management review shall include decisions related to continual improvement opportunities and any need for changes to the *group*

certification organization's management system.

4.3.3 The group certification organization shall retain documented information as evidence of the results of management reviews.

### **Appendix ~~32~~: SFI ~~Chain-of-Custody~~ Certificate Requirements (Informative)**

1. **Certificate Statement:** The X company or facility has been independently certified by Y, an *SFI certification body* accredited to perform *SFI program* audits that conform to the *SFI ~~2015-2019~~2022 Chain of Custody Standard*.
  2. **Certificate Meaning:** The certificate holder has been independently certified by an *SFI certification body* accredited to perform audits to the; *SFI ~~20215-2019~~ Forest Management Standard, the SFI 2022 Fiber Sourcing Standard, the SFI 2022 Chain of Custody Standard or the SFI 2022 Certified Sourcing Standard*, and has received a license from the *SFI Office of Label Use and Licensing* authorizing use of the *SFI ~~trademark, service marks~~*.
- ~~3.2.1~~ Certificate Content:** All *SFI ~~chain-of-custody~~* certificates shall have the following information, at a minimum, on the certificate:
- a. certificate ~~Chain-of-custody~~ number: The numbering system will have a three-letter abbreviation of the *SFI certification body's* name, followed by "*SFIFM; SFIFS; SFICS or SFICOC*," followed by the certification body identifier for that organizationaudit number. The audit number can be unique to the *SFI certification body*. (Example for *certification body XYZ* completing its 20<sup>th</sup> chain-of-custody audit: *XYZ-SFICOC-0020*.)

- b. scope of the certification granted including the standard;
- c. for SFI Certified Sourcing or Chain of Custody certificates the certificate shall:
  - i. list whether it is an individual, multi-site or group certificate and
  - ii. the products covered by the certificate
- d. date of issuing or renewing certificate and the expiry date. The issue date on a certificate shall not be before the date of the certification decision.
- e. where the certificate includes an appendix to the certificate, the certificate shall include a reference to the appendix, and the appendix shall be considered as part of the certificate and be provided whenever the certificate is requested.
- fb. The *SFI* off-product logo ~~tradeservice~~-mark (see below) must be placed on the certificate.



- ge. The logo of the accreditation firm (ANABSI or SCC) for the *SFI certification body* conducting the ~~chain-of-custody~~ certification must be placed on the certificate.

**3. — Eligible Entities:** ~~Any company or facility that manufactures or distributes forest-based manufactured or printed products and wants to document that the material in the products was manufactured by a company certified to the *SFI 2015-2019 Chain of Custody Standard* is eligible to obtain an *SFI 2015-2019 Chain of Custody Standard* certificate (except as provided for in the *SFI Policy on Illegal Logging* in Section 7 of the *SFI* requirements document).~~

**4. — Application for *SFI* Label Use:** ~~The certified company and/or the *SFI* certification body will inform the *Office of Label Use and Licensing* of a successful completion along with a copy of the chain of custody certificate.~~

**5. — Issuance of License and Certificate**

**5.1. — Issuance of License.** ~~The *Office of Label Use and Licensing* shall issue the license to use the *SFI* off-product marks to the applicant upon written confirmation of successful completion of the chain of custody audit.~~

**5.2. — Certificate.** ~~The *SFI* certification body provides the written documentation of a successful completion of an audit.~~

**6. — Availability of On-Product Label:** ~~Holders of *SFI 2015-2019 Chain of Custody Standard* certificates may also qualify for use of an *SFI* on-product label and may receive authorization from the *SFI Office of Label Use and Licensing*.~~

