

SFIS 2015-1019 draft – Section 3: Chain of Custody

Std. ref.	New?	SFI says...	MixedWood comments	MixedWood suggestion
2.1.1	new	...shall ensure that certified forest content is separated or controlled to ensure that is is not mixed with or replaced by...	1)This indicator departs established and well-understood terminology used elsewhere in the CoC marketplace. 2)This indicator refers to “certified forest content” but not “certified content”.	1)“Separable and identifiable” is a simple, clear, and recognized standard. 2) Distinctions between “certified content” and “certified forest content” are troublesome, confusing, and generally unnecessary.
2.1.2	old	certified forest content	Does this not apply to other categories of “certified content”?	Distinctions between “certified content” and “certified forest content” are troublesome, confusing, and generally unnecessary.
2.2.1	new	...with the source and/or delivery...	This seems to depart from CoC norms established by PEFC and FSC, and seems likely to require careful and explicit guidance to ensure clear interpretation. If input verification is not expected at transaction level, then clear expectations need to be clearly established.	Clarify the intent of this change.
2.2.1.d 3.2.1.d	old	category of origin	This requirement for delivery verification is not consistent with the related requirement at 2.4.2.	Requiring a formal “SFI claim” statement to be used both for sales declarations and for delivery verification is consistent and clear – minimizing current confusion on this subject.
2.2.1 (para. 2)	old	...between the organization and the customer	Use of the term “the organization” in this paragraph seems to refer, not to the subject organization, but to its supplier. The reference to “customer” appears to refer to the subject organization.	Recommend modifying this way: “...communications between the supplier and the organization...”
2.2.1 (Note 2)	old	An organization...that uses the physical separation method...must know...	This statement appears to apply only to companies applying Physical Separation, but recognition and proper accounting of percentage-based input claims is vital for all CoC methods.	Eliminate this note, and ammend 2.2.1.d sufficiently to require identification of quantitative CoC input claims (via SFI Claim statements).
2.2.2	new	certified forest content	Does this not apply to other categories of “certified content”?	Substitute “certified content”
2.2.2	new	...the criteria set for the supplier have been met.	What does this mean?	Substitute a clear reference to verifying the validity and scope of suppliers certification
2.3	new	Separation...and...identification	This change requires separation AND identification. This is excessive and unnecessary in many cases.	Language in the 2010-14 standard is sufficient and appropriate
2.4.1	new	...providing a clear	This phrase is redundant and unnecessary. The SFI Claim	Drop the phrase



		indication of input category...	statement – by definition - provides all necessary information for CoC claim assignment.	
2.4.2.d	new	...official SFI Claim.	The list of claim statements is missing the Volume Credit claim	All potential SFI Claim statements need to be included
2.4.2 Note	old	...categories of origin...	The reference here to categories of origin, rather than SFI Claim is yet another invitation to mis-application and confusion.	Standardized and clear the use of terminology is essential to keeping the standard usable and effective. I recommend clear and explicit definition of SFI Claim statements, used consistently throughout the standard.
3.1.1	old	The percentage-based method...	The Scope (1.1) and the heading to Part 3 both refer (helpfully) to three (not two) methods for CoC. This aligns with industry norms and simplifies parallel application (with PEFC & FSC). This indicator omits reference to Volume Credit method and suggests two (rather than three) options.	Insert reference to both %-based and volume credit method.
3.1.2.6	new	...shall identify all products...so it is possible to determine... ...on-product identification is not required... ...products that carry the...label must be accompanied...	This entire indicator (including the note) is extremely confused. Much of the language is probably unnecessary and serves only to distract.	Re-work from scratch. Consider original language & omitting the note.
3.2.1	new	...delivery and receipt...	This language differs significantly from the related indicator 2.2.1, but it is not clear why.	Clarify the intend and standardize the language in 3.2.1 & 2.2.1
3.2.1 (para. 2)	new	... and the customer.	This language differs significantly from the related indicator 2.2.1, but it is not clear why.	Clarify the intend and standardize the language in 3.2.1 & 2.2.1
3.2.2	new	certified content	This language differs significantly from the related indicator 2.2.2, but it is not clear why.	Recommend using “certified content” in all standard references to CoC protocols
3.4.1	old	...can label all the products...	This element implies that the principal output of percentage calculation is to support on-product labeling. In practice, this is rarely the case.	Recommend re-stating this element to emphasize SFI Claim assignment. Reference to labeling should be secondary.
3.6.2	new	SFI Claim statement:	This indicator omits any reference to percentage-based claim statements	Include all applicable SFI Claim statements
3.7.1	new	...without a SFI chain of custody claim...	This would seem to require a DDS evaluation even if sourcing directly from SFI Section 2 certified suppliers.	Broaden this requirement to allow other recognized and non-controversial sources.



				Consider recognizing PEFC- and FSC-certified sources as non-controversial.
3.7.1	new	Controversial sources include...	It is unnecessary to repeat the definition of Controversial sources in the body of the standard, when it is documented in Section 13	Simplify the standard by not repeating definitions.
3.7.1 Note	new	Conversion sources cannot...	This note relates directly to the “certified forest content” claim, but no reference is found in Section 2. How is a CoC company expected to determine the content of a forest content claim provided by a supplier? How could it possibly be verified?	If this requirement is to be incorporated into the standard, it needs to be found somewhere in Section 2, Obj. 1-8.
3.7.1.2 3.7.1.6 3.7.1.7	new	...evaluate the potential risk... ...assess the risk... ...address significant risk...	These three, rather broad indicators all specify a risk-based protocol which seems to resemble but may not align with other industry DDS protocols.	Consider consolidating risk assessment and DDS protocols to facilitate parallel implementation and potential recognition by other programs.
3.7.1.4	new	Program...to promote...	This requirement is borrowed from Section 2. It is even less appropriate here.	Reconsider this indicator
3.7.1.5	new	Ensure it knows...	Is “knowledge” enough? How can it be verified? In the event a company knows its suppliers do not apply SFM, what then?	Reconsider this indicator
3.7.1.8	new	See Section 7...	This indicator lacks any specific, verifiable requirement.	Add some sort of required action: e.g. adopt, accept, approve, etc.
4.6.2 4.6.3 4.6.4 4.6.5 4.6.6 4.6.7	new	Various	This section of the standard has been increased substantially in length and level of detail without any substantive change. The additional detail includes several redundancies and potential contradictions. It adds complexity without adding value.	Return to the simple and straightforward approach in SFIS 10-14
5.2	new	...shall be risk rated...	The narrow range of “scenarios” used to define low and high risk categories are likely to fail in practice. Many potential situations can be envisioned where risk rating will be uncertain.	Use a simple pass/fail criteria to define low risk, that ensures all others are rated high risk (or vice versa)

