Std. ref.	New?	SFI says…	MixedWood comments	MixedWood suggestion
table of contents	New	various	The organization of Section 4 invites mis-application in its structure. Parts 1-6 are presented under the heading "Rules for Use of SFI CS Label", yet have little to do with labeling rules.	Organize this standard in a manner which makes its content clear. Clearly distinguish four subject areas: 1. Rules for control & application of SFI Cert. Sourcing claims 2. Rules for application of CoC labels 3. Rules for application of CS labels 4. General rules for TM use
1.1	old	This section describes…	This is the only scope statement found in Section 4, yet it describes (rather vaguely) only a portion of the subjects covered in the document.	Clarify and re-state the scope statement to include all relevant subject areas. See comments above re: table of contents
1.2	old	…in order to use the SFI on-product label	While the requirements found in Parts 1-6 do apply to the use of SFI on-product labels, they seem to also apply to companies who make explicit CS claims on products without labels	Clarify and expand both scope and purpose statements to cover claims as well as labels.
1.3	old	The following label…	The SFI certified sourcing label is – in practical terms – virtually identical to the SFI CoC label. In practice, this leads to endless confusion and opens the SFI program to criticism and "greenwashing" claims.	Consider a re-design to more clearly distinguish this unique program.
Part 3	old	Certified Sourcing Label	The heading of this section implies that it applies only to the use of on-product labels, not to application of claims independent of labeling.	Clarify whether this indicator (& others related to it) apply to the application of CS claims independent of product labeling.
3.1	old	Primary producers are… They must…	This element contains both a definition and several requirements.	Move the definition to Section 13. Separate the requirements for more clear application.
3.2	old	Secondary producers are… They must…	This element contains both a definition and several requirements.	Move the definition to Section 13. Separate the requirements for more clear application.
3.3	old	The label cannot be used…	This requirement seems to apply only to labelled products, but it widely interpreted to include application of CS claims – independent of labels.	Clarify whether this indicator (& others related to it) apply to the application of CS claims independent of product labeling.
3.4	old	…for use of the…label…	This requirement seems to apply only to labelled products, but it widely interpreted to include application of CS claims – independent of labels.	Clarify whether this indicator (& others related to it) apply to the application of CS claims independent of product labeling.

5.1 – 5.4	old	Certified sourcing:	These elements are simply definitions.	Move to Section 13
5.5	new	SFI Certified Sourcing	This definition of SFI CS is inconsistent with various other requirements for secondary producers. Application of the 2/3 rule – by definition – allows the inclusion of inputs outside the requirements of this definition.	Clarify the definition of CS products using an "eligible input" concept. Move definitions to Section 13 and ensure they are not contradictory.
5.6	new	See Section 3…	This seems to make elements of the CoC standard normative for CS.	Clarify whether Section 3, 3.6 is normative for Section 4 CS claims.
5.6	new	Up to 1/3 of the supply…	This is inconsistent with the definition of SFI CS in 5.5.	Clarify the definition of CS products using an "eligible input" concept. Move definitions to Section 13 and ensure they are not contradictory.
6.1	new	Avoidance of Controversial Sources	This section repeats much of the language found in Section 3, 3.7	Consider consolidating overlapping parts of Sections 3 & 4. See also my comments provided for Section 3, 3.7
Part 9	old	SFI-Certified Forest Content Labels	The section title and the 1st paragraph both seem to require that SFI CoC labels are limited to claims which include some virgin (Cert. Forest Content) content. This is not consistent with the "certified content" definition and related requirements found in Section 3	Clarify requirements and expectations about the relationship between content claims, "certified content", "certified forest content", and applicable SFI labels.
9.1 – 9.3	old	…company that uses the…method.	These sections ignore the large proportion of companies which use neither the credit nor the percentage method.	Modify with language which makes label application subordinate to application of claims following various CoC protocols.
10.14	old	…certified forest content…	This requirement uses the terms "certified forest content", and "certified content" in succession and apparently without distinction. The meanings of these terms are quite distinct, making this requirement unclear. Is label use prohibited for percentage-based claims lacking virgin (cert. forest content) content?	Clarify the intended meaning of this indicator. Apply the terms "certified content" and "certified forest content" more consistently and clearly.
10.17	old	Printers that…	This requirement is widely used to permit CoC-certified companies (including but not limited to printers) to control, manage, and apply SFI CS claimed material using their CoC protocols. Limiting application of this element to printers will be very distruptive to the market.	Substitute "companies" for "printers" in this element. Consider incorporating this important element into the CoC standard to make it easier to locate and apply.