

## SFI STANDARDS REVISION - SECOND COMMENT PERIOD

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### SFI STANDARD REVISION COMMENT TEMPLATE FOR SFI STANDARDS AND RULES

	SFI 2022 Standards & Rules Section (April XX Version)	Clause (e.g. Indicator 1.a)	Comment	Proposed new language
1	Section 4: Chain of Custody	2.2	This paragraph uses a defined term: certified content that is narrowly defined in Section 14 to only include Certified Forest Content (i.e. product of SFI certified forests).	The definition of Certified Content is badly flawed.
2	Section 4: Chain of Custody	3.1, etc, etc.	The next of many, many uses of the defined term "certified content" that are illogical if the definition is applied strictly.	Fix the definition (see section 14)
3	Section 4: Chain of Custody	3.2.4	An unclear and badly written clause that is "explained" with a longer NOTE. Does this refer to geography? Only geography?	Go back and re-write the clause so it is clear on it's own. If the NOTE is still needed, you're not done.
4	Section 4: Chain of Custody	3.2.6	An unclear and badly written clause that is "explained" with a longer NOTE. This seems to say: "A product group should be defined so that we know what it is and is not". Does this need to be said at all?	Go back and re-write the clause so it is clear on it's own. If the NOTE is still needed, you're not done. Consider whether this clause would be missed if dropped.
5	Section 4: Chain of Custody	3.3.1	This clause is clear, except for defined terms. If Vc means only certified content, then the clause may not be used to calculation % of recycled and/or certified sourcing. If Vo only means certified sourcing, then the formula is useless for reporting % of certified sourcing.	Root problem is that this clause assumes only 1 kind of certified content. But the standard recognizes 3.
6	Section 4: Chain of Custody	3.3.1 Note	"...both can count..." effectively contradicts the defined term "certified sourcing". Better to go back and fix the definition.	Apply the certified content definition to include all 3 categories of relevant content.
7	Section 4: Chain of Custody	3.5.5	What is meant by "certified material"? Same as certified content? Something else?	Fix the definition (see section 14) for certified content and use it here.
8	Section 4: Chain of Custody	3.5.7 ii	Too long, and applies narrowly.	Asking auditors to verify this at each and every audit is not free. Put this back in guidance.
9	Section 4: Chain of Custody	4.1	The term "category of the origin" is both unnecessary and commonly confusing.	In 1st paragraph, substitute "following information". At (d), substitute "certification claim or status"
10	Section 4: Chain of Custody	4.1 Note1	Citing the definition doesn't help. The definition of "origin" only covers CFC, Cert. Sourcing, Recycled.	Following suggestion above should remove need for this note.
11	Section 4: Chain of Custody	4.1 Note2	The phrase "must know" is imprecise and unhelpful.	This note represents an attempt to explain the meaning of a standard clause. Always a sign that the clause may not be clear as written. See note above for 4.1.
12	Section 4: Chain of Custody	4.2	This clause uses "certified forest content" instead of "certified content". Hopefully a mistake. If intentional, it requires Supplier Verification only for suppliers of virgin, certified inputs.	Change to "certified content". And fix the definition (see Section 14).
13	Section 4: Chain of Custody	5.2	This looooooong list of claim options includes (appropriately) "certified sourcing". This will be illogical if, in fact, certified sourcing is not included in definition of "certified content"	Fix the definition (see section 14) for certified content!!