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## 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 3: Fiber Sourcing	1.1	"What Fiber Sourcing Std Covers" needs re-writing. Reference to "...pulp and veneer..." makes not sense. Reference to Appendix 1 should be obsolete.	"...applies to any organization with a fiber sourcing program that acquires roundwood and field manufactured or primary-mill residual chips to support a forest products facility"
2	Section 3: Fiber Sourcing	1.2.2	This entire clause is a disaster. Very unclear and confusing to read. Nearly impossible to apply and audit. "...for all harvest operations through fiber sourcing activities, such as..."?!? List of activities all appear elsewhere in the standard - so what's the point?	This clause appears intended to credit other parts of the FS standard as "counting" for an FECV "program". That's a policy not a performance indicator. This should be substantially re-thought or simply dropped.
3	Section 3: Fiber Sourcing	4.1.2	The indicator lacks reference to international law, making it inconsistent with the Objective.	...with applicable international, federal, provincial, state, or local laws and regulations.
4	Section 3: Fiber Sourcing	5.1.2	Are there any Certified Org's conducting research on GMO trees? Aren't all CO's required (by Obj. 4) to comply with applicable laws & regulations?	Unnecessary and redundant. Drop it.
5	Section 3: Fiber Sourcing	5.1.3	The action verb "Consider..." has no place in a performance indicator. Is this indicator intended to be optional? If so, what's the point?	Indicator should read "Share knowledge..." or be dropped.
6	Section 3: Fiber Sourcing	5.3	Both indicators in this PM have always been meaningless. "Where available, monitor information..." is embarrassingly weak. "...are knowledgeable..." is unauditabile.	Take another look at the excellent new language in Section 2, Obj. 9. Look for things that might apply to FS.
10	Section 3: Fiber Sourcing	6.1.6	The general intent of this indicator is evident, but syntax is very confusing. Is this meant to apply to individuals, organizations, or both? Current language will make this extremely difficult to audit.	
11	Section 3: Fiber Sourcing	6.1.6	The ambition intent of this new indicator is admirable, but "...shall strive to achieve 100%...where they exist..." renders it somewhat slippery. Are there places where QLP's do not exist? Would this not contrary to 6.1.4?	Drop "where they exist". Clean up syntax. Clarify whether QLP status applies to individuals or organizations.
12	Section 3: Fiber Sourcing	6.2, 6.3	This collection of indicators effectively applies performance requirements on SIC's rather than on Certified Organizations. This approach has always been extremely difficult to audit effectively. When/if an SIC fails to conform to one of these indicators, auditors are forced to raise NC's against individual members. Inevitably this becomes disconnected, confusing, and very inefficient.	Drop all specific requirements that apply only SIC's. Continue to require SIC support (via PM 7.1). Add SIC indicators through a separate SIC auditing protocol.
13	Section 3: Fiber Sourcing	11.4	Requires mitigating the risk of risk	"...mitigate the risk of controversial sourcing in high risk areas."
14	Section 3: Fiber Sourcing	11.4, 1-5	This entire section is badly written. Stream-of-consciousness phrasing is hard to follow with any precision.	Drink 2 cups of coffee and start again.