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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 6: Labels and Trademarks	3.1	There is far, far, far too much detail in this clause. Text seems to be seeking to explain rather than set a performance standard.	Radically simplify the normative language. Confine explanations in a separate guidance document that doesn't have to be audited.
2	Section 6: Labels and Trademarks	3.1 - 3rd paragraph, 2nd sentence	"...must meet a 70% threshold which can be obtained by certified forest content, and/or recycled content." and "If...drops below the 70% threshold ...disclose the actual amount of...and/or recycled content on the label." This conflicts with footnotes 2, 6, & 10, which specify different thresholds for both CFC (10%) and recycled content (100%).	The defining thresholds need to be clear (they are not). Internal conflict needs to be resolved and removed.
3	Section 6: Labels and Trademarks	3.1, tables, and footnotes	As noted above, the details here are indecipherable. On balance, this draft is less comprehensible than the current standard. IMPORTANT NOTE: the opaqueness and complexity of SFI CoC label rules currently serves to encourage CoC companies to place the Certified Sourcing on all products - regardless of content. This seriously undermines the credibility of both programs (CoC and CS).	