

## Public Comments Received for AS 4707

No.	Submitted By	Page	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
1.	AFPA		General		Can we please align the language between the two standards AS/NZS 4708 and AS/NZS 4707? This will help ensure continuity.		<b>Agreed.</b>  Ed. Checked use of AS/NZS
2.	WT	Cover	Header	N/A	AS 4707:201X is wrong	AS 4707:2021	<b>Agreed.</b>  Editorial
3.	JAS-ANZ		n/a	n/a	Clarification: This template and associated communication for this review states the draft Standard as a 'AS/NZS'. However it is solely an 'AS'.	Accuracy and consistency required in referring to the AS 4707.	<b>Agreed</b>  Ed. Checked use of AS/NZS
4.	JAS-ANZ	P2		Para 8	'Responsible Wood' and 'Australia Forestry Standard Limited' terms are used interchangeably in the same paragraph.	The Standard should adopt a consistent naming of either 'Responsible Wood' or 'Australian Forestry Standard Limited'	<b>Agreed</b>  Editorial. Global check for the use of AFS
5.	JAS-ANZ	2	n/a	Keeping Standards up to Date	Amendments subsequent to publication would not be included in the published Standard; hence the narrative on this requires amendment.	Add bold. 'It is important that readers assure themselves they are using a current Standard, <b>in addition to</b> any amendments that may have been published since the Standard was published'.	<b>Reject.</b>  This is SA required wording
6.	WT	4	Preface	1 <sup>st</sup> para.	Wording might be improved for: "Forest products originating from forests certified to AS/NZS 4708 and subject to third party certification are eligible for recognition under the	Change to "Products originating from forests certified to AS/NZS 4708 through third party verification audits are eligible for recognition under the Responsible Wood Certification Scheme (RWCS). "	<b>Accept.</b> Editorial update

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					Responsible Wood Certification Scheme (RWCS). “		
7.	WT	4	Preface	1 <sup>st</sup> para.	Why is this sentence here? “AS/NZS 4708 certification also covers health, safety and labour related requirements.”	Do you mean 4708 or 4707? Suggest, “Forest and chain of custody certifications also covers health, safety and labour related requirements.”	<b>Agreed.</b>  Editorial. Revised and updated text.
8.	WT	4	Preface	4 dot points	The tasks of certification bodies also include – collection of notification fees for RW.	Add a 5 <sup>th</sup> dot point , “collection of notification fees for RW.”	<b>Reject</b>  Outside the Scope of a STD.
9.	JAS-ANZ	4	Preface	Line 5	It is not clear that notwithstanding certification to AS/NZS4708, that AS4707 certification is only (currently?) applicable within Australia.	Add bold. “Forest products originating from <b>Australian</b> forests certified to AS/NZS4708...’.  This same notion could be re-emphasised elsewhere.	<b>Reject</b>  Could also refer to NZ or PEFC materials
10.	JAS-ANZ	4	Preface	Para 6	There is strong weighting in the narrative to accreditation of the certification bodies by JAS-ANZ, and that does overstate the current position. Of the 255 CoC certificates 77 are JAS-ANZ accredited certificates. (~30%); the balance are accredited certifications under other accreditation bodies. We believe this section should be reframed to describe the wider use of IAF	Suggested rewording would be along the lines of:  International Accreditation Forum (IAF) recognised accreditation bodies accredit certification bodies to audit and certify to particular standards to ensure the transparency and credibility of the certification process. They also ensure third-party competence, impartiality and independence in regards to certification activities and to facilitate mutual recognition. Certification bodies undertaking chain of custody certification to this standard must be accredited by JAS-ANZ or an IAF recognised accreditation body.	<b>Agreed.</b>  Editorial change to give stronger reference to IAF

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					recognised accreditation bodies, and then mention that JAS-ANZ is one such body.		
11.	WT	5	Forward	1 <sup>st</sup> para.	Use of “and controlled sources” appears incorrect.	“other sustainably managed forests recognised through PEFC mutual recognition, recycled material and/or controlled sources. ”	<b>Agreed.</b> Editorial update
12.	JAS-ANZ	1.1	Scope		Correction	“...on the origin of forest and tree-based products <del>in</del> <b>from</b> sustainably managed forests, recycled material and controlled sources”.	<b>Agreed.</b>  Editorial update
13.	WT	7	Definition	1.3.4 Certified material	Should not x% PEFC Origin also be added?	“x% RW certified”, “x% PEFC certified”, “x% RW/PEFC certified” , “x% PEFC Origin”	<b>Agreed.</b> Editorial clarification
14.	WT	7	Definition	1.3.5 Certified product	Should not x% PEFC Origin also be added?	“x% RW certified”, “x% PEFC certified”, “x% RW/PEFC certified” , “x% PEFC Origin”	<b>Agreed</b> Editorial clarification
15.	JAS-ANZ	8	1.3.7	Note 1	Note 1 takes some reading to understand its intent. Suggest use of bullet points or similar.	<i>Note 1: Organisations implementing the physical separation method may use the wording “100% PEFC Origin” for material that was delivered by a supplier that is a forest owner/manager covered by a PEFC recognised sustainable forest management (SFM) certificate with the claim:</i> <ul style="list-style-type: none"> <li>• “100% PEFC certified”; or</li> </ul> <i>“100% PEFC Origin” from a chain of custody certified supplier or with another PEFC endorsed SFM system claim.</i>	<b>Agreed.</b>  Editorial clarification
16.	WT	8	Definition	1.3.9	“compliance” is wrong term.	“related to its <b>conformance</b> with ”	<b>Agreed.</b>  Editorial clarification
17.	WT	8	Definition	1.3.10	What is “(…) ”	Remove it.	<b>Reject</b>

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18.	WT	9	Definition	1.3.12	Why is State jurisdiction not mentioned?	“complying with applicable local, <b>State</b> , national or international legislation”. Local generally means at the Municipal or Council level and not State.	<b>Accept.</b> Editorial clarification
19.	STT		1.3.16		Ecologically Important forest areas.  This is a term used in PEFC meta standards. However the AS/NZ standard refers to significant biodiversity values	Make consistent with proposed AS/NZ forest management standard. Or recognise both.	<b>Agreed.</b>  Added a note referencing the Equivalent wording from AS/NZS 4708. Editorial
20.	Koppers	9	1.3	12(e)	Local Land Services NSW issue certificates to authorise conditional land clearing under the Land Management (Native Vegetation) Code 2018. Timber so obtained is legally sourced, can be used on site or sold for commercial purposes. Pole, sawmill and other timber may be legally approved and available under the Land Management Code Cl 5(c) Part 4 Continuing Use, Cl 5(d) Part 5 Equity and Cl 5 (e) Farm Plan. It is not clear that this timber may qualify as “other than justified circumstances” to	LLS Land Management (Native Vegetation) Code 2018 is available at <a href="https://legislation.nsw.gov.au/view/html/inforce/current/sl-2018-0083#sec.5">https://legislation.nsw.gov.au/view/html/inforce/current/sl-2018-0083#sec.5</a>	<b>Agreed.</b>  Clarification made. State regulations added.  The committee believe the example is a justified circumstance

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					be considered as a non-controversial source.		
21.	WT	11	Definition	1.3.18 Note 1	Why is NZ mentioned? Think this might be from AS/NZS 4708?	Possibly remove NZ?	<b>Agreed.</b>  Editorial
22.	WT	13	Definition	1.3.32 Percentage method	Incorrect indent	Fix indent	<b>Agreed</b>  Editorial
23.	JAS-ANZ	13	1.3.33	Physical separation method	Error in definition	Change to “...(e.g. labelling, marking, unique species and/or separation of production times)...”	<b>Agreed.</b>  Editorial
24.	JAS-ANZ	16	2.4	Record Keeping/Note	The ‘Note’ that ‘Evidence of certified status can be a print-out from the RW or PEFC Website’ is more generous than the approach approved/accepted by PEFC to date. Certainly the scope statement on some FMS certificates would require greater specificity to enable accurate interpretation via just the PEFC or RW website and/or certificate.	Change to “Note: Evidence of certified status <b>may</b> be able to be accurately determined via a print-out from the RW or PEFC Websites’.	<b>Agreed.</b>  Editorial
25.	STT	16	2.4		This list seems to duplicate the requirement to demonstrate conformance with other parts of the standard. Instead of specifying what needs to be kept, how about the bullet points specifying that records shall be kept to demonstrate	Refer to comments.	<b>Reject.</b>  The STD needs to remain aligned with PEFC and the committee believes the

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					conformance with relevant sections of the standard.  e.g .point b could read: Records of input material shall be kept to demonstrate conformance with section 3 of the standard.		requirement are clear.
26.	STT	16	2.4	Note	This is implying that the organisation does not need to sight a certification certificate from a supplier. What is proposed it to rely on a third party provider to provide evidence of certification. Also, I think it contradicts the statement in 3.1.2.	Remove, unless I have mistakenly interpreted, if so, then clarify intent. If kept, relocate to 3.1.2 so its all in one spot.	<b>Reject.</b>  Remain aligned with PEFC. An online check of a certificates status is acceptable.
27.	WT	17	2.6		“compliance” is wrong term.	“covering its <b>conformance</b> with ”	<b>Agreed.</b>  Editorial update
28.	WT	17	2.6		Include plural of audit. Some organisations have multiple audits per year.	“review the result of the internal audit(s)”	<b>Agreed.</b> Editorial update
29.	WT	17	2.7	a	Is there a word “workday”?	Just checking.	<b>Reject</b>  There is!
30.	JAS-ANZ	18	2.9	Outsourcing	The current note needs to be presented as a requirement rather than a note.	Delete “Note:” and retain the sentence “Internal audits of outsourced activities...activity starts”.	<b>Agreed.</b> Editorial update

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31.	WT	18	2.9	a	The need to have “physically separated from other material or products” may well create a dilemma for organisations who use ‘co-mingled’ stockpiles of woodchips. I am just raising this as outsourcing might apply and it is not possible to separate chips.	No wording is suggested – this is ‘food for thought’.	<b>Reject.</b>  Remain aligned with PEFC
32.	STT	19	2.10		Minimum legal age clause.	Use the words in the proposed AS/NZ forest management standard that allows use of younger workers in positive circumstances.	<b>Accept.</b> Editorial update
33.	WT	19	2.10	e	The phrase though in PEFC standard possibly sets an impossible goal of “do not endanger safety or health.” This would potentially mean that any organisation with a danger/warning sign was not in conformance with the standard.	“do not fail to control danger to safety or health.”	<b>Accept.</b>  Editorial clarifications made
34.	JAS-ANZ	19	2.10c		Requirement may not make sense “workers, who are under the minimum legal age, the of 15, or the compulsory school attendance age, whichever is higher, are not used”. The school leaving age is 16 or 17 in Australia, so that therefore must set the minimum requirement? What does ‘under the minimum legal age’ refer to or intended to be interpreted?	Revise.	<b>Accept.</b>  Editorial clarifications made

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35.	STT	20	3.1	3.1.1 & 3.1.2	<p>We have a challenge with respect to customers presently demanding more information regarding source and legality evidence than the standard requires. They are doing this under the false impression that CoC standards ask for it. Despite numerous conversations over the years, I have failed to resolve these issues. The issue places an additional significant and unnecessary administrative burden on our staff – turning what should be an automated process into a manual one.</p> <p>Specifically, some COC customers demand a copy of a harvest plan for each coupe prior to accepting delivery. There is no requirement in this standard for that demand to occur. If a supplying organisation is certified, COC holders should be able to assume that the suppliers are compliant with the standard. That is the whole point of certification! It also only verifies a small component of a management system is in place (planning and</p>	<p>Add a note:</p> <p>Where product is supplied in conformance with 3.1.1 and 3.1.2 no additional source verification is required to meet the requirements of this standard.</p>	<p><b>Agreed.</b></p> <p>Informative note added for clarity</p>



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					potentially legality). It does not consider aspects of conducting, monitoring, responsible estate management, stakeholder engagement etc that a certified forest manager is required to do, and that is independently audited.		
36.	STT		3.1.1 b	Other areas as well.	<p>Product groups/identification I'm a bit confused by how this is supposed to work.</p> <p>What is meant by 3.1.1 b) product identification?</p> <p>Does this relate to product group?</p> <p>The requirement needs to reflect that species can also be grouped and supplied as one. E.g. we supply Eucalypt species. That may be a number of species. The product group has been redefined to capture this, but other parts of the standard still refer to individual species .e.g p.27 A.2 Access to Information.</p>	<p>Re-word to: Product information sufficient to relate to product group</p> <p>Standardise text to indicate species type is acceptable.</p>	<p><b>Agreed.</b></p> <p>Editorial. Additional wording to clarify added</p>
37.	WT	23	4.3	Example	This is not an example that shows calculations.	Include, "at the end of the twelfth month."	<p><b>Reject</b></p> <p>Keep alignment with PEFC.</p>

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38.	WT	24	4.4		Who decides if “the organisation can extend”? Them or RW or the CB?	Please clarify, so no confusion on what is permitted.	<b>Reject.</b>  A standard cannot allocate responsibilities to their parties.
39.	JAS-ANZ	26	5	5.1d	Consider broadening the requirement from ‘illegal sources’ to ‘controversial sources’ in alignment with the PEFC ST 2002:2020.	See comment.	<b>Reject</b>  This has been accomplished already in this revision.
40.	WT	27	A3	1 <sup>st</sup> para	Why the limit to ‘raw’? This denies traders and others who might not modify material.	Change to “risk of procuring material”.	<b>Agreed.</b>  Editorial update
41.	Koppers	29	Table A2	Item (e)	Koppers is CoC certified (certificate COC20014). Koppers note that this source of log/pole supply in NSW is legally approved and at a low level but increasingly common source in peri-urban areas. It is appropriate there is beneficial use of timber from such legal sources.	Clarification of Table A2 List of indicators for significant risk at origin level 2, 3 item (e). Maybe by examples of “justified circumstances”	<b>Agreed.</b>  Editorial clarification. Use text from definition. Added State regulations  No examples necessary

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42.	WT	30	Table A2	Footnote 4	Why is RW messing from “prior agreement with the PEFC Council”?	Change to “prior agreement through RW with the PEFC Council”.	<b>Agreed.</b>  Editorial change
43.	WT	31	Table A3	Last para	The grammar of this sentence has consistently been misinterpreted by organisations. The intent is to firstly review/check risk assessment annually. Then, secondly, revise this is characteristics change.	Change to “The risk assessment shall be reviewed at least annually. If necessary it shall be revised, when changes regarding the characteristics listed in A.2 of this appendix occur.”	<b>Agreed.</b>  Editorial update
44.	WT	33	A.5.4	1 <sup>st</sup> sentence	“compliance” is wrong term.	“measures for no-conformance”.	<b>Agreed.</b>  Editorial update
45.	JAS-ANZ	39	Appendix C  And 1.3.19	Table C1	Table C1 includes a definition for ‘Non-wood Based Forest Material’ and cross references to 1.3.19; however at that reference the term is ‘non-wood based materials’. That latter definition is different to that in PEFC ST 2002:2020 (‘nn-wood forest products’).	The definitions in 1.3.19, Table C1 need to be consistent, and also aligned with that in PEFC ST 2002:2020.	<b>Reject</b>  Table C1 is informative. Committee considers the table clear and understandable.
46.	WT	35	B.2	Last point	The amount on current exchange rates does not equate to 10 M Euros, per PEFC. An idea would be for RW to have capacity to set and change as necessary the amount.	Change to “have a turnover of a maximum Australian dollars set by RW”. This way RW could alter this during the life of the certificate due to financial parameters. RW already does this on the Notification Fee and adjusts this as necessary.	<b>Agreed</b>  Minor correction made. Turnover

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							should have been factored in Australian terms.																											
47.	FTT	36	B.2		The limitations for membership of a producer group has not allowed for the natural growth of the companies involved., ie <i>“have no more than 100 employees (full-time employees equivalent), have a turnover of maximum of 25, 000,000 AUD”</i>	<p>have no more than 100 employees (full-time employees equivalent), have a turnover of maximum of 30,000,000 AUD</p> <p>In the 2014 iteration of the standard, the cap was also set at \$25 Million AUD and was not indexed. If it was indexed, the cap should be around \$28.27 Million given the historical rate of inflation. By 2024, if it was indexed, the cap would be around \$30 Million. I realise this example of bracket creep is not intentional, but as we all would like to see businesses grow it would be appropriate to have some mechanism in the standard to allow this upper limit to grow as well. I have attached a table below showing how the turnover cap would be if it were indexed.</p> <table border="1"> <thead> <tr> <th>EOFY</th> <th>Turnover Cap</th> <th>Inflation (CPI) rate</th> </tr> </thead> <tbody> <tr> <td>2014</td> <td>25,000,000</td> <td>3.10%</td> </tr> <tr> <td>2015</td> <td>25,775,000</td> <td>1.60%</td> </tr> <tr> <td>2016</td> <td>26,187,400</td> <td>1.10%</td> </tr> <tr> <td>2017</td> <td>26,475,461</td> <td>1.90%</td> </tr> <tr> <td>2018</td> <td>26,978,495</td> <td>2.00%</td> </tr> <tr> <td>2019</td> <td>27,518,065</td> <td>1.50%</td> </tr> <tr> <td>2020</td> <td>27,930,836</td> <td>1.20%</td> </tr> <tr> <td>2021</td> <td>28,266,006</td> <td>1.73%</td> </tr> </tbody> </table>	EOFY	Turnover Cap	Inflation (CPI) rate	2014	25,000,000	3.10%	2015	25,775,000	1.60%	2016	26,187,400	1.10%	2017	26,475,461	1.90%	2018	26,978,495	2.00%	2019	27,518,065	1.50%	2020	27,930,836	1.20%	2021	28,266,006	1.73%	<p><b>Agreed</b></p> <p>Minor correction made. Turnover should have been factored in Australian terms.</p>
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48.	EW	36	B.2		<p>The limitations for membership of a producer group has not allowed for the natural growth of the companies involved., ie <i>“have no more than 100 employees (full-time employees equivalent), have a turnover of maximum of 25, 000,000 AUD”</i></p>	<p>have no more than 100 employees (full-time employees equivalent), have a turnover of maximum of 30,000,000 AUD.</p> <p>In the 2014 iteration of the standard, the cap was also set at \$25 Million AUD and was not indexed. If it was indexed, the cap should be around \$28.27 Million given the historical rate of inflation. By 2024, if it was indexed, the cap would be around \$30 Million. I realise this example of bracket creep is not intentional, but as we all would like to see businesses grow it would be appropriate to have some mechanism in the standard to allow this upper limit to grow as well. I have attached a table below showing how the turnover cap would be if it were indexed.</p>	<table border="1"> <thead> <tr> <th>EOFY</th> <th>Turnover Cap</th> <th>Inflation (CPI) rate</th> </tr> </thead> <tbody> <tr><td>2014</td><td>25,000,000</td><td>3.10%</td></tr> <tr><td>2015</td><td>25,775,000</td><td>1.60%</td></tr> <tr><td>2016</td><td>26,187,400</td><td>1.10%</td></tr> <tr><td>2017</td><td>26,475,461</td><td>1.90%</td></tr> <tr><td>2018</td><td>26,978,495</td><td>2.00%</td></tr> <tr><td>2019</td><td>27,518,065</td><td>1.50%</td></tr> <tr><td>2020</td><td>27,930,836</td><td>1.20%</td></tr> <tr><td>2021</td><td>28,266,006</td><td>1.73%</td></tr> <tr><td>2022</td><td>28,755,008</td><td>1.64%</td></tr> <tr><td>2023</td><td>29,226,590</td><td>1.83%</td></tr> </tbody> </table>	EOFY	Turnover Cap	Inflation (CPI) rate	2014	25,000,000	3.10%	2015	25,775,000	1.60%	2016	26,187,400	1.10%	2017	26,475,461	1.90%	2018	26,978,495	2.00%	2019	27,518,065	1.50%	2020	27,930,836	1.20%	2021	28,266,006	1.73%	2022	28,755,008	1.64%	2023	29,226,590	1.83%	<p><b>Agreed. Increased to 30mil</b></p> <p>Minor correction made. Turnover should have been factored in Australian terms.</p>
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						2024	29,761,437	2.24%	
49.	GH	36		B.2	<p>As a current licensee of Fine Timber Tasmania, I am writing to express my views regarding the current draft of The Australian Standard for Chain of Custody for Forest and Tree-Based Products, AS4707.</p> <p>Fine Timber Tasmania is a producer group certified under AS4707:2014, Chain of custody for forest products. We are the largest group scheme in Australia with 30 diverse licensees, ranging in size from single owner-operators &amp; artisans, small sawmills and manufacturers, through to larger sawmills. This diversity has allowed us to flourish as a group and to promote the Responsible Wood certification scheme and the sustainable resource that is Tasmanian timbers. The diverse nature of the group has also provided benefits by bringing together like-minded organisations and creating a synergy where we all gain</p>	<p>In the 2014 iteration of the standard, the cap was also set at \$25 Million AUD and was not indexed. If it was indexed, the cap should be around <b>\$28.27 Million</b> given the historical rate of inflation. By 2024, if it was indexed, the cap would be around <b>\$30 Million</b>. I realise this example of bracket creep is not intentional, but as we all would like to see our business grow it would be appropriate to have some mechanism in the standard to allow this upper limit to grow as well. This would allow our organisations to stay in a producer group. I have attached a table below showing how the turnover cap would be if it were indexed.</p>			<p><b>Agreed</b></p> <p>Minor correction made. Turnover should have been factored in Australian terms.</p>

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					<p>through enhanced channels of communication and increased networking amongst peers.</p> <p>My concern is specifically with the limitations of the membership of a producer group. The new standard reads: <i>“The producer group is limited to participation of sites that are domiciled in a single country and that: have no more than 100 employees (full-time employees equivalent), have a turnover of maximum of 25,000,000 AUD.”</i></p>		
50.	WT	38	B.3.3	b	“compliance” is wrong term.	Change to “conformance with”.	<p><b>Agreed</b></p> <p>Editorial update</p>
51.	WT	39	C.1	Table	Another useful example for neutral material is additives in paper, such as clay, starch, or fillers.	You could add these. Many certificate holders make or use paper.	<p><b>Agreed</b></p> <p>Editorial update</p>