1 DECEMBER 2023

Standard Setting Procedure v3.0

Approvals

The signatures below certify that this procedure has been reviewed and accepted, and demonstrates that the signatories are aware of all the requirements contained herein and are committed to ensuring their provision.

	Name	Signature	Position	Date
Prepared by	Lesley Colvin		Standards and Compliance Manager	25/10/2022
Amended by	David McElroy		Head of Standards	1/12/2023
Approved by	Una Jones		CEO	1/12/2023

Disclaimer

This document is a continuous work-in-progress. Any errors, required amendments, or additions should be reported to the document owner, and updated copies of the document (or notification of updates) will be issued thereafter.

Copyright

Amendment Record

This procedure is reviewed to ensure its continuing relevance to the systems and process that it describes. A record of contextual additions or omissions is given below:

Page No.	Section	Context	Date
5	Introduction (1) Scope (3)	Added China and farmers to acknowledge expansion from just Mongolia; corrected language from accredit to certify; updated mission. Added "but naturally due consideration of these are required during standard criteria definition and deliberation." for context regarding assurance and monitoring.	05/07/2022
6/7	Terms and Definitions (4)	Changed 'Certification Body (CB)' to 'Conformity Assessment Body (CAB)' as per updated terminology. Revised 'Standards System Improvement Committee (SSIC)' definition to accurately reflect committee structure Removed 'Steering Group' definition to accurately reflect committee structure. Updated 'Standard' definition to 'Standard (voluntary)' to use ISEAL quote for definition of a voluntary standard. Updated 'Technical Group' definition to clarify the guidance provided by the group will be 'technical' advice.	05/07/2022
8/9	Roles and Responsibilities (6)	6.1.4 - Removed bullet points a-d 6.2.3 – Updated to reflect an accurate structure of the SSIC 6.3.1 – changed wording from 'dissent' to 'opposition' and added clarifying statement '(General agreement characterised by the absence of sustained opposition to substantial issues by any important part of the concerned interests.)'.	05/07/2022
9	Development/Revision Process (7)	6.3.2 – 'A decision is considered to pass with a majority consensus (75% majority required)' added. 7.1.2 – Changed wording from 'a Senior Manager within the SFA' to 'the SFA CEO in consultation with the SFA Board of Directors' to more accurately reflect the decision-making process. 7.1.4 removed reference to 'previous' SSIC being reconvened.	05/07/2022

7	Terms and Definitions (4)	Updated the example contained within the definition of element from Conformity Assessment Scheme to the SFA Cashmere Standard, the Clean Fibre Processing Standard or the Chain of Custody Guidelines	27/01/2023
6	Scope (3)	Updated to include current elements of the SFA Standard System are the SFA Cashmere Standard, the Clean Fibre Processing Standard or the Chain of Custody Guidelines.	27/01/2023
All	Document restructure	Document has been revised to remove duplication and include specific references to ISEAL requirements. Document has been restructured to act as a user manual for staff responsible for standard setting.	1/12/2023

Contents

Purpose and scope

This Standard Setting Procedure (SSP) sets out development and revision of all SFA normative documents, including the assurance system that supports the Standards. This covers the following Standards:

- [SFA Cashmere Standard](#);
- [SFA Clean Fibre Processing Standard](#);
- [SFA Chain of Custody Guidelines](#).

Where the standard-setting organisation recognises existing standards as partially or fully equivalent, this shall be based on: (a) a determination of the equivalence of the sustainability performance; and (b) an assessment that the existing standard reflects the local context[1].

Assurance and certification processes are defined in the [SFA Assurance and Certification Manual](#). The process for the oversight of assurance and certification is defined in the Conformity Assessment Body Oversight Manual. The working language of the SFA is English. This procedure is available on request to any external party.

It is intended that standard setting at the SFA shall be:

Compliant	Policy development shall comply with international best practices for standard setting (e.g., the ISEAL Code of Good Practice for Setting Social and Environmental Standards and ISO/IEC 17067: 2013 Conformity assessment — Fundamentals of product certification and guidelines for product certification schemes).
Inclusive	Policy shall be developed in a transparent and inclusive way, such that those who want to participate in the Standard Setting Procedure can do so.
Evidence-based	Policy shall be developed in an evidence-based way.
Fit-for-purpose	Policy shall be fit-for-purpose, such that any changes to the standards or requirements are auditable and at least partially resolve the original issue(s) raised.
Relevant	Policy shall be developed based on merit, such that any changes to the standards or requirements contribute to the realisation of the SFA Theory of Change and associated strategic plans.

---

[1] As per clause 6.4.3 of the [ISEAL Standard Setting Code v6](#).

Review of this document

These procedures shall undergo a scheduled review at least every five years or before the next review of the standard, whichever is sooner[2]. Earlier revision may happen if determined to be necessary by the SFA Secretariat.

Any complaints about the process for standard development shall be addressed through Complaints and Dispute Resolution Procedure[3]. Any complaints received about the content of a standard will be considered through this Standard Setting Procedure.

Normative References

The following referenced documents are to be used in conjunction as binding requirements wherever applicable. It is understood that any updated versions of these documents released from the relevant body will replace these references throughout these procedures and the relevant certification and accreditation bodies shall conform and follow these updated versions in accordance with the timeline established by the relevant body. References to individual requirements within these documents refer to the version noted in this section.

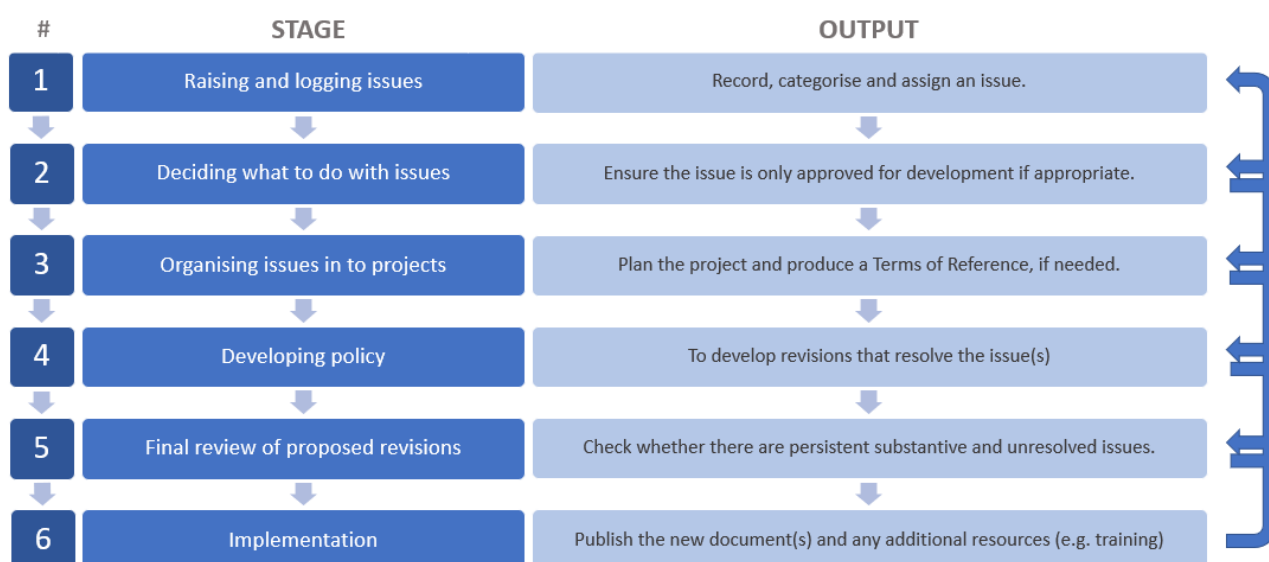| Standard	Title
ISO17067	Conformity assessment — Fundamentals of product certification and guidelines for product certification schemes
EA 1/22	EA Procedure and Criteria for the Evaluation of Conformity Assessment Schemes by EA Accreditation Body Members
IAF MD 25	Accreditation Assessment of Conformity Assessment Bodies with Activities in Multiple Countries
ISEAL	Setting Social and Environmental Standards – Code of Good Practice

[2] As per clause 4.1.2 of the ISEAL Standard Setting Code v6.
[3] As per clause 5.11.1 of the ISEAL Standard Setting Code v6.

How to use the rest of this document

The remainder of the Standard Setting Procedure (SSP) is comprised of six stages (Figure 1) that represent key tasks that usually need to be managed as part of reviewing and/or revising SFA program documents. Each stage has specific outputs that are typical of policy development. Annexes A–E provide guidance on activities (Table 1) that may need to be done at different time across the six stages (Table 2). The current SSP is non-exhaustive; if you have suggestions for improving or expanding the content, please email standards@sustainablefibre.org.

Policy development is generally expected to be completed or coordinated by a project manager, with the Standards and Assurance team providing support and advice as needed. Where steps need to be coordinated or completed by a different person to the Project Manager, this is stated. The steps detailed in the SSP should only be followed where possible and appropriate; Project Managers may adapt the SSP as per the needs of their projects. However, the SFA is required to carry out certain steps per the ISEAL Standard Setting Code; these steps shall be done in all instances. Where this is the case, the specific ISEAL clause is referenced.

#	STAGE	OUTPUT
1	Raising and logging issues	Record, categorise and assign an issue.
2	Deciding what to do with issues	Ensure the issue is only approved for development if appropriate.
3	Organising issues in to projects	Plan the project and produce a Terms of Reference, if needed.
4	Developing policy	To develop revisions that resolve the issue(s)
5	Final review of proposed revisions	Check whether there are persistent substantive and unresolved issues.
6	Implementation	Publish the new document(s) and any additional resources (e.g. training)

Figure 1: The stages of SFA policy development and their outputs.

Stage 1: Raising and logging issues

The objective of this stage is to systematically record and assign each issue to an appropriate person in the SFA Executive.

1.1   Within the context of the SFA Standard Setting Procedure, an "issue" is any problem or opportunity that relates to the SFA certification program and could be addressed by revision of one of the SFA's normative documents.

1.2   Any internal or external stakeholder can raise an issue (and request at Standard review) at any time by emailing standards@sustainablefibre.org.[4]

1.3   The issue must be immediately recorded in the Issue Log (see the Issue Log Guidance on how to log issues). The issue log is not publicly available.

1.4   When logging the issue, a person from the SFA Executive should be assigned as lead, to ensure it receives timely review. Note this lead may not necessarily become the Project Manager for any project resulting from this issue.

---

[4] As per clause 5.8.3 and 5.8.4 of the ISEAL Standard Setting Code v6.

Stage 2: Deciding what to do with issues

The objective of this stage is to ensure issues are appropriately assigned, categorised, and prioritised or closed. An issue is "prioritised" when it is deemed to require further review. An issue is "closed" when it is deemed to not require further review.

2.1   Each new issue should be assigned to the most appropriate lead/team and category (Table 1 and flowchart in Figure 1 with examples of categorised projects in Table 2).

2.2   Figure 2 provides guidance on whether an issue should be addressed by holding the issue back until the next scheduled review, or, if the issue is urgent, adding the issue to an existing review, triggering a derogation or triggering an early review. Note that if a new major or medium issue is added to the scope of an ongoing review after Stage 5: Final Review has started, we may need to choose between:

   a.   Including the issue from the current stage of the review (i.e. skipping earlier stages for the new issue), or

   b.   Extending the review, or

   c.   preparing for multiple releases of the relevant document(s).

Table 1: Categories for issues to be resolved through the Standard Setting Procedure

Category	Definition
Major	New standard, or a change to the intent or scope of a standard, or a change to the assurance system which constitutes a major change to intent or scope of a standard. Meets the threshold for public consultation and scrutiny by the SSIC and SFA Board of Directors[5].
Medium	A change to a standard or the assurance system, which changes a practice but does not constitute a change to the intent or scope of a standard.
Minor	A change to guidance, other clarification, or editorial change (e.g. errata, correcting a typo, etc) in a standard or the assurance system, which does not constitute a change of practice or a change to the intent or scope of a standard.

Table 2: Examples of the categories applied to SFA projects

Category	Example project	Rationale
Major	Slaughter house due diligence (SFA Cashmere Standard v2.0)	A requirement for entities to change their interactions with buyers of goats would be new and so a change in intent.
	Country of origin (SFA Chain of Custody Standard v1.0)	Asking entities to include the country of origin on any geographic based claims would be a change in intent.
	Recycling (Clean Fibre Processing Standard v2.0)	Including recycling within this Standard would be a change of scope.
Medium	Transaction certificates (SFA Chain of Custody Standard v1.0)	No longer requiring transaction certificates to be issued by CABs in real time would be a change of practice, but not a change of intent (which remains to eliminate fraud).
Minor	Removal of duplication (SFA Cashmere Standard v2.0)	Removing redundancy in a Standard by removing a requirement that duplicates another is not a change in practice or intent, hence it is minor.
	Clarification of what 'where applicable' means (SFA Cashmere Standard v2.0)	Clarification only. Under the ISEAL Standard Setting Code this is a "non-substantive" revision and would not require consultation (although it would likely be included in a wider standard review anyway).

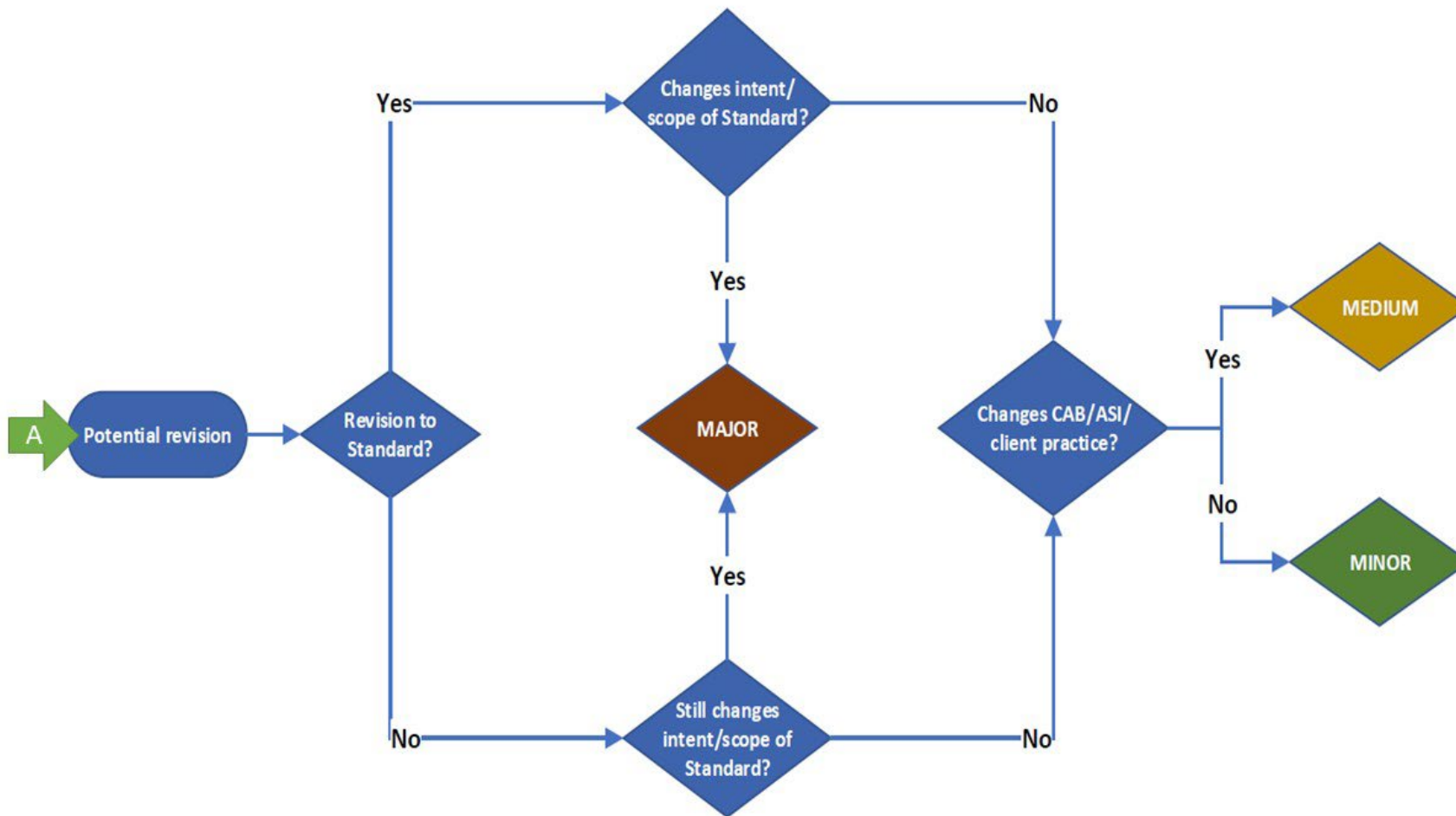[5] As per clause 5.6.3.c. of the ISEAL Standard Setting Code v6.

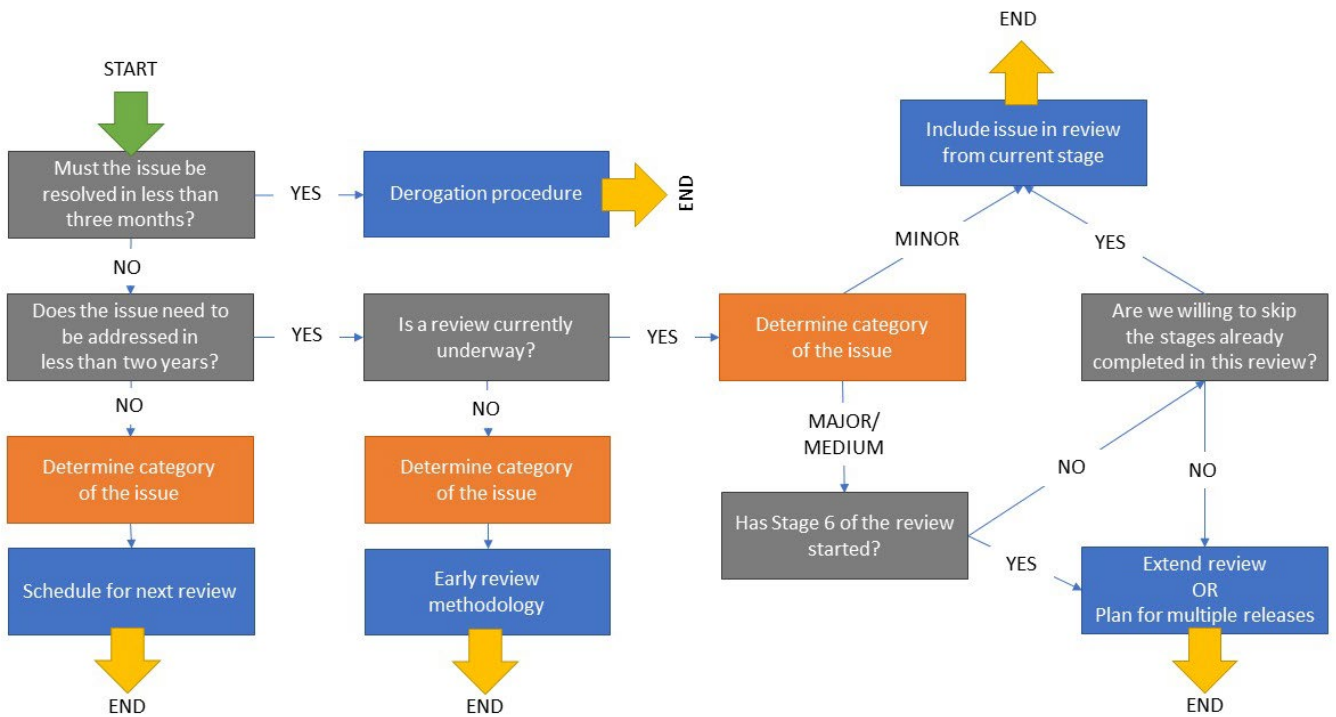*Figure 1: Decision tree for categorising an issue*

Figure 2: Decision tree for prioritising a new issue. Grey cells are questions, blue cells are outcomes and orange cells represent the decision tree in Figure 1.

Stage 3: Organising issues into projects and document reviews

The objective of this stage is to plan a document review and/or project. Projects are defined as a bundle of one or more related issues that have been approved for development. A document review is a collection of projects which relate to one or more of the same SFA programs document or several different documents moving through the Standard Setting Procedure.

3.1　The SFA shall commence reviews of existing Standards within five years of the publication of the latest version of that Standard that included a revision related to a major issue[6].

3.2　Publication of a new version of an existing Standard less than five years after the publication of the latest version of that Standard that included a revision related to a major issue must demonstrate one of the following:

   a. The Standard results in unintended consequences that compromise the goals of the Standard;

   b. The Standard contains mistakes or otherwise needs clarification;

   c. There has been a significant change in best practice or stakeholder expectations;

   d. Force majeure.

3.3　When a scheduled review is due to commence[7], the following information sources should be examined by one or more assigned leads to determine if any issues identified from these should be included in the scope of the review:

   a. Issues in the Issue Log (which have not already been prioritized);

   b. Revisions to other SFA documents;

   c. Analysis of achievement and certification data;

   d. Non-conformities raised on CABs through CAB oversight;

   e. Information on the impact of the standard, as identified through the SFA's Monitoring and Evaluation Framework;

   f. New technology developments;

   g. Changes in industry best practices including normative reference document updates;

   h. New or changed legislation.

---

[6] As per clause 5.8.1 of the ISEAL Standard Setting Code v6.
[7] Scheduled reviews are required per clause 4.1 of the ISEAL Standard Setting Code v6.

3.4 The Secretariat must produce a Statement of Intent (SOI) at the outset of Standard development and keep it up to date and publicly available during the review.

3.5 Where a New Standard is being developed a Terms of Reference (ToR) needs to be developed in addition to an SOI and subjected to a targeted consultation with organisations that have developed <u>similar</u> international standards.[8]

3.6 The Secretariat must publish a summary of any ToR on the SFA website.[9]

3.7 The Secretariat shall update the ToR for a Standard at the start and end of any review of that Standard[10].

---

[8] As per clause 4.2.1 of the ISEAL Standard Setting Code v6.
[9] As per clause 5.3.1 of the ISEAL Standard Setting Code v6
[10] As per clause 5.1 of the ISEAL Standard Setting Code v6.

Stage 4: Developing policy for resolving the issue

The objective of this stage is to develop and propose revisions, if any, that are expected to resolve the issue such that the SFA Theory of Change is realised[11] and that stakeholders are and feel heard and influential.

4.1   To complete this stage, the Secretariat shall do public consultation[12].

4.2   To complete this stage, the Secretariat should do impact testing[13].

4.3   To complete this stage, the Secretariat shall inform stakeholders of the outcome of this stage[14].

4.4   Requirements shall cover and/or be relevant to all of the social, environmental and economic objectives of the Standard, as defined in the Terms of Reference for that Standard[15].

4.5   Requirements shall be assessable by CABs.

4.6   Requirements shall be expressed in terms of process, management and performance criteria, rather than design or descriptive characteristics[16].

4.7   Requirements shall be accompanied by sufficient guidance on the standard to support consistent interpretation of its requirements[17].

4.8   Requirements shall not be prescriptive.

4.9   Requirements shall not give preference to one geographic region over another.

4.10   Requirements shall not deliberately favour a particular technology or patented item[18].

4.11   Requirements shall not contradict legislation. Note that the standard must not be written to solely fulfil applicable legal requirements but must add value over and above that of relevant legislation[19].

4.12   Requirements shall be written unambiguously, using wording that is objective, logical, valid and specific and enable consistent application and evaluation[20].

4.13   The Standard may include guidance for local applicability.

---

[11] As per clause 5.4 of the ISEAL Standard Setting Code v6.

[12] As per clause 5.4 of the ISEAL Standard Setting Code v6 and Annex A: Consultation

[13] As per clause 5.5 of the ISEAL Standard Setting Code v6

[14] As per clause 5.4.5 of the ISEAL Standard Setting Code v6

[15] As per clause 6.1 of the ISEAL Standard Setting Code v6

[16] As per clause 6.3.1.b of the ISEAL Standard Setting Code v6

[17] As per clause 6.3.2 of the ISEAL Standard Setting Code v6

[18] As per clause 6.3.1.c of the ISEAL Standard Setting Code v6

[19] As per clause 6.2 of the ISEAL Standard Setting Code v6

[20] As per clause 6.3.1.a of the ISEAL Standard Setting Code v6

Stage 5: Final review of proposed revisions to resolve issues

The objective of this stage is to check whether our stakeholders believe that the proposed revisions have resolved the issue, or the issue is persistent and/or substantively unresolved (such that additional rounds of consultation are needed)[21].

5.1   To complete this stage, the Secretariat shall do public consultation on drafts of all documents in which revisions are proposed which must be accompanied by a report on the impact the proposed revisions will have as a whole and project-level background papers that explain the reasoning behind the proposed revisions[22].

5.2   Shall inform stakeholders of the outcome of this stage[23].

Examples

- **Major project**: While 60 days of public consultation was held during the development of the SFA Cashmere Standard v1.0, the persistent disagreement regarding animal welfare issues meant that an addition round of 60s public consultation is needed in the development of v2.0. Note that ISEAL do not mandate *when* the required public consultation should happen in a project's timeline; the 60-day round could occur a few months before final sign-off by governance bodies, if needed.

---

[21] As per clause 5.4.1.c of the ISEAL Standard Setting Code v6.

[22] As per clause 5.4.1.c of the ISEAL Standard Setting Code v6 and Annex A: Consultation.

[23] As per clause 5.4.5 of the ISEAL Standard Setting Code v6

Stage 6: Implementation

The objective of this stage is to publish the program document containing the policy and additional resources such as training and communications.

6.1   The Secretariat should seek professional proof reading of all normative documents.

6.2   Closure of a review is marked by the publication of the following on the SFA website and through the SFA mailing list of interested stakeholders:

    a.   New versions of all affected normative documents;

    b.   An updated master list of program documents;

    c.   Training resources for updating CAB competencies;

    d.   A summary of changes[24];

    e.   A stakeholder engagement report, where consultation activities are summarised, all feedback is published and an explanation given for how each substantive comment was addressed (or not) and why[24].

6.3   The following shall be noted in the Standard:

    a.   That the official language of the Standard is English and in the case of inconsistency between translated versions, the English version shall prevail[25];

    b.   Contact information for the Secretariat[26];

    c.   Reference to the formal status of the document including the release date, effective and transition (if any) dates[27];

    d.   The date the Standard is expected to be reviewed[28];

    e.   A disclaimer stating that the SFA shall not be held liable for use of the standard;

    f.   A copyright statement;

    g.   A definition of the scope of the Standard[29];

    h.   A bibliography of all original intellectual sources of content that contributed to the Standard[30].

6.4   The Secretariat shall make hard copies of statements of intent, Terms of Reference, standards, and other related materials available upon request at as low a cost as possible, and covering only reasonable administrative costs[31].

---

[24] As per clause 5.4.5 of the ISEAL Standard Setting Code v6
[25] As per clause 5.7.3.c and d of the ISEAL Standard Setting Code v6
[26] As per clause 5.7.3.a of the ISEAL Standard Setting Code v6
[27] As per clause 5.7.3.b of the ISEAL Standard Setting Code v6
[28] As per clause 5.8.2.b of the ISEAL Standard Setting Code v6
[29] As per clause 6.3.1.d. of the ISEAL Standard Setting Code v6.
[30] As per clause 6.3.1.e. of the ISEAL Standard Setting Code v6.
[31] As per clause 5.7.2 of the ISEAL Standard Setting Code v6.

Annex A: Governance[32]

The SFA

A.1   The SFA is the Secretariat for all standards development and revisions.

A.2   The SFA shall ensure that the standards system are developed in accordance with this document.

A.3   The SFA is the owner of standards developed and reviewed using these procedures and retains decision making authority to establish and change the requirements of a standard.

Standards System Improvement Committee (SSIC)

A.4   The development of the SFA's standards shall be scrutinised by the SFA Standards System Improvement Committee (SSIC), as per the SSIC Terms of Reference.

A.5   The Secretariat shall keep an open invitation for expressions of interest to join the SSIC on their website.

SFA Board of Directors

A.5   SFA standards and associated normative documents shall be scrutinised by the SFA Board of Directors upon or before publication. The SFA Board of Directors may veto decisions made by the SFA with regard to the development and revision of Standards and associated normative documents.

---

[32] As per clause 5.6 of the ISEAL Standard Setting Code v6.

Annex B: Consultation

This section contains FAQs related to additional ISEAL requirements regarding public consultation. These must be followed at all times during stakeholder consultation.

What are the ISEAL requirements for length and number of public consultations?

B.1   Requirements for the length and number of public consultation are as follows:[33]

    a. The public consultation phase for standards development or revision shall include at least one round of 60 days for comment submissions by stakeholders. We normally do the 60-day public consultation as part of Stage 5: Final review of proposed revisions to resolve issues.

    b. For new standards development, a second round of consultation of at least 30 days shall be included.

How must we communicate about public consultation?

B.2   The Secretariat shall announce the launch of a public consultation via:

    a. The SFA's email mailing list for interested stakeholders;

    b. Member's meetings;

    c. On the SFA website.

What do we need to consider when targeting participants for my consultation event?

B.3   The SFA shall consider:

    a. Who is affected by the project, including any other organisations that use the SFA Chain of Custody Standard to assess their own supply chain (e.g. Textile Exchange) should be included.

    b. The level of expertise needed to participate, who has the expertise that is needed to progress the project and whether a minimum level of expertise is expected of participants.

    c. That participation is not otherwise unfairly exclusive, specifically:

        i.   that the consultation event is open to all.[34]

        ii.   That we have balanced representation, both across stakeholder groups and geographies.[35]

        iii.   how under-represented and disadvantaged stakeholder groups will be able to participate in the consultation.[36]

What needs to be archived at the end of a consultation?

B.4   The SFA shall make original comments received during a consultation period publicly available as soon as feasible after the event(s).[37] This includes full responses to surveys, but only minutes from workshops and interviews. This is done by creating summary reports that are supported by consultation logs as annexes to the summary reports.

---

[33] As per clause 5.4.1 of the ISEAL Standard Setting Code v6.
[34] As per clause 5.4.2.a of the ISEAL Standard Setting Code v6.
[35] As per clause 5.4.2.b of the ISEAL Standard Setting Code v6.
[36] As per clause 5.4.4 of the ISEAL Standard Setting Code v6.
[37] As per the Aspirational Good Practice in clause 5.4.6 of the ISEAL Standard Setting Code v6.

B.5   We must keep on file and make available to stakeholders on request (notwithstanding any data protection regulations) for at least five years the following records related to consultation events:[38]

      a. lists of stakeholders contacted.

      b. stakeholders involved at each stage of the process.

      c. comments received and a synopsis of how those comments were taken into account.

B.6   All files containing personal information shall be password protected.

What types of consultation methods do we use?

B.7   For all consultation events you should use methods that are appropriate to meet the stated objectives of the consultation.

B.8   The proposed methods must provide stakeholders with appropriate and authentic opportunities to contribute to the development or revision of program documents[39]**.**

B.9   Individuals and organisations that participate in consultation shall be considered a stakeholder and asked if they wish to be notified of future opportunities to participate.

---

[38] As per clause 5.10 of the ISEAL Standard Setting Code v6.
[39] As per clause 5.4.3 of the ISEAL Standard Setting Code v6.