

# SBP Framework Standard 4: Chain of Custody

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Documents included with this Standard:

*Instruction Note 4A: SBP tertiary feedstock requirements*

*Instruction Note 4B: Trademark use*

*For further information on the SBP Framework and to view the full set of documentation see [www.sustainablebiomasspartnership.org](http://www.sustainablebiomasspartnership.org)*

*Document history*

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## List of abbreviations#

BP	Biomass Producer
CPET	Central Point of Expertise for Timber (run by DEFRA)
CB	Certification Body
CoC	Chain of Custody
CHP	Combined Heat and Power
CITES	Convention on International Trade in Endangered Species
DEFRA	UK Department for Environment, Food and Rural Affairs
DECC	UK Department of Energy and Climate Change
EUTR	European Union Timber Regulation
FM	Forest Management
FMS	Forest Management Scheme
FSC®	Forest Stewardship Council
GRI	Global Reporting Initiative
GGL	Green Gold Label
GHG	Greenhouse Gas
ILO	International Labour Organisation
LVS	Legality Verification Systems
LAV	Locally Applicable Verifiers
PPE	Personal Protective Equipment
PEFC	Programme for the Endorsement of Forest Certification
RRA	Regional Risk Assessment
RA	Risk Assessment
RSB	Roundtable on Sustainable Biomaterials
SVP	Supplier Verification Programme
SB	Supply Base
SBE	Supply Base Evaluation
SBR	Supply Base Report
SBP	Sustainable Biomass Partnership
SFI	Sustainable Forestry Initiative

# 1 Background

The Sustainable Biomass Partnership (SBP) was formed in 2013 by European utilities that are using biomass, mostly in the form of wood pellets or chips, in large thermal generating plants. Biomass-fired power and heat generation is seen as an important technology for achieving the EU's 2020 renewable energy targets and EU member states are adopting their own national approaches to ensuring that the biomass used is legally and sustainably sourced.

SBP's objective is to develop the tools necessary to demonstrate that, as a minimum, solid biomass used for energy production meets these national requirements. The SBP Framework is designed as a clear statement of principles, standards and processes necessary to demonstrate such compliance. Wherever possible, the Framework takes into account and builds on existing regulatory mechanisms and on voluntary certification standards already applied to other forest product streams or to other biomass sources.

The SBP Framework provides a means to collect data describing the nature of the feedstock as well as data to be employed in the regulatory calculations of greenhouse gas (GHG) savings from its use. It also provides a means to demonstrate that risks to forest carbon stocks are managed and that forests' carbon sequestration capability is maintained.

Collectively, the six SBP Standards represent a certification framework, or scheme, against which organisations can be assessed for compliance by independent third-party Certification Bodies (CBs). An organisation that satisfactorily demonstrates compliance receives a certificate and is entitled to make SBP claims in relation to its biomass.

The SBP Framework is made freely available for use by all supply chain actors irrespective of whether or not they are members of SBP.

## 2 Scope

This document (SBP Standard 4: Chain of Custody) sets out the requirements that, if successfully implemented, allow organisations to make claims related to compliance with the SBP requirements.

The starting point for the SBP Chain of Custody (CoC) standard is the forest Supply Base (SB). Principle 1 of SBP Standard 1 requires the Biomass Producer (BP) to be able to demonstrate the origin of feedstock. This standard covers the CoC requirements, following receipt of feedstock by the BP. The BP and components of the downstream supply chain, including trade, transport and processing, require CoC certification if those organisations or their customers take legal ownership of the product and wish to make SBP claims about their products.

Parties that are not SBP CoC-certified cannot sell SBP-certified products. Service providers which are part of the SBP supply chain but do not take legal ownership of the biomass (e.g. transport companies, storage platforms) may choose whether or not they wish to be CoC-certified.

For biomass to carry an SBP sustainable biomass claim, there cannot have been any physical mixing with feedstock or biomass for which EUTR legality has not been verified.

## 3 Normative references

*SBP Standard 1: Feedstock Compliance Standard*

*SBP Standard 2: Verification of SBP compliant feedstock*

*SBP Standard 3: Certification Systems. Requirements for Certification Bodies*

*SBP Standard 5: Collection and Communication of Data*

*SBP Standard 6: Energy and Carbon Balance Calculation*

## 4 Glossary of Terms and Definitions

Please refer to separate *SBP Glossary of Terms and Definitions*.



## 5 SBP Chain of Custody principles

### 5.1 CoC system requirements

5.1.1 The legal owner shall be certified against an SBP-approved Chain of Custody (CoC) system and hold a valid certificate.

5.1.2 The legal owner shall implement all aspects of the SBP-approved CoC system requirements for the SBP feedstock and biomass. Where there is a conflict between the requirements in the SBP-approved CoC system requirements and those specified in the SBP standards, the SBP standards shall have precedence.

Note: SBP feedstock or biomass will not necessarily enter into the scope of the SBP-approved CoC system certification, but the SBP-approved CoC system CoC processes and requirements shall extend to SBP feedstock and biomass.

### 5.2 Inputs

For the BP: feedstock inputs

5.2.1 Feedstock suppliers do not make SBP claims and the BP shall be responsible for determining the compliance of feedstock inputs with all relevant SBP requirements.

5.2.2 Only the following feedstock inputs shall be considered to be SBP-compliant feedstock

- Feedstock received with an SBP-approved Forest Management Scheme Claim or SBP-approved recycled claim.
- Feedstock sourced from within the BP's defined Supply Base (SB) and for which a valid Supply Base Evaluation (SBE) has determined that all the indicators in the SBP Feedstock Compliant Standard are low risk.
- Feedstock sourced within the scope of the BP's own SBP-approved Chain of Custody (CoC) System certification, for example, non-certified reclaimed feedstock sourced in compliance with FSC-STD-40-007: FSC Standard for Sourcing Reclaimed Material for Use in FSC.

Note: Feedstock received in compliance with SFI Fiber Sourcing requirements is not considered to meet SBP-certified feedstock or Controlled Feedstock requirements.

Note: Section 5.2.4 below specifies requirements relating to partial claims.

- Post-consumer tertiary feedstock sourced following the requirements of Instruction Note 4A, SBP tertiary feedstock requirements.

5.2.3 Only the following feedstock inputs shall be considered to be Controlled Feedstock.

- Feedstock received with an SBP-approved -controlled feedstock systems claim.

- Feedstock sourced within the scope of the BP's own SBP-approved controlled feedstock system certification, for example, non-certified feedstock sourced in compliance with the FSC® Standard for Company Evaluation of FSC® Controlled Wood, FSC-STD-40-005.

5.2.4 When feedstock or biomass is received with an SBP-approved Chain of Custody (CoC) Systems partial claim (for example a % claim) the BP shall calculate the proportion of the feedstock or biomass that is SBP-compliant feedstock and the corresponding proportion that is Controlled feedstock in-line with the SBP-approved CoC system being implemented by the BP to determine output claims.

5.2.5 For all feedstock inputs the BP will keep input records. In addition to meeting the requirements specified in the SBP-approved CoC system being implemented, the input records will contain at least:

- a) Invoice reference(s) or other transaction number
- b) A description of the physical properties of the feedstock
- c) The volume of physical input
- d) The supplier
- e) Transaction date
- f) The certificate numbers of any certified suppliers

For legal owners downstream of the biomass production process: Biomass inputs

5.2.6 A legal owner that receives biomass with an SBP claim shall, in addition to meeting the requirements specified in the SBP-approved CoC system being implemented, record the following information:

- a) Invoice reference(s)
- b) A description of the physical product
- c) The volume of physical input
- d) The supplier
- e) Transaction date
- f) The certificate numbers of any certified suppliers

5.2.7 Biomass inputs downstream of the biomass production process shall be allocated to one of the following four groups.

1. SBP-compliant biomass: This biomass is received from a legal owner with SBP certification and is produced in compliance with all relevant SBP standards, following the requirements of an SBP-approved Chain of Custody (CoC) System and is derived from SBP-compliant feedstock. It may physically contain SBP-compliant feedstock, Controlled feedstock or EUTR-compliant biomass.
2. SBP-controlled biomass: This biomass is received from a legal owner with SBP certification and is produced in compliance with all relevant SBP standards following the requirements of an SBP-approved Chain of Custody (CoC) System and is derived from Controlled feedstock. It may physically contain SBP-compliant feedstock, Controlled Feedstock or EUTR-compliant biomass.
3. EUTR-compliant biomass: This biomass is compliant with the requirements of section 6.1 of this standard. It may be mixed with SBP-compliant biomass and SBP-controlled biomass.
4. Other Biomass: All biomass which cannot be categorised into any of the 3 other categories. This biomass may not be mixed with any biomass carrying an SBP claim and must remain physically separated from SBP-compliant and SBP-controlled biomass.

## 5.3 Chain of Custody control system

5.3.1 All requirements of the relevant chain of custody control system specified in the SBP-approved CoC system shall be implemented to calculate outputs.

5.3.2 The BP shall calculate the proportions of biomass outputs with specific sustainability characteristics and batch specific data required in SBP Standard 5: Collection and Communication of Data by applying the relevant chain of custody control system specified in the SBP-approved CoC system.

5.3.3 All calculations, including data of inputs and outputs, must be site specific and shall not be combined between different sites. A 'site' is defined as 'one geographical location with precise boundaries within which products can be mixed'. A site is not a collection of facilities that are located in different geographical locations, even if that is in the same region. A site can include multiple silos or tanks in the same physical location.

## 5.4 Outputs

5.4.1 Biomass supplied with an SBP claim shall, in addition to meeting the requirements specified in the SBP-approved CoC system being implemented, be supplied with the following information:

- a) The name and address of the buyer;
- b) The date on which the invoice was issued;
- c) A description of the product – this must correspond to the description of the product given in the input and output records
- d) The quantity of the products sold with specific batch data

5.4.2 A legal owner shall record the certificate numbers of the customer to which it supplies biomass, where applicable.

## 5.5 Output claims

5.5.1 No SBP on-product trademark use is permitted.

5.5.2 There are two SBP claims:

- 'SBP-compliant biomass'.
- 'SBP-controlled biomass'.

5.5.3 All sales and delivery documentation shall clearly differentiate biomass supplied with an SBP-claim from other biomass in the sale or delivery.

5.5.4 'SBP-compliant biomass' is biomass which is produced in compliance with all relevant SBP standards using the rules of an SBP-approved Chain of Custody (CoC) System and is derived from SBP-compliant primary feedstock. It may physically contain SBP-compliant feedstock, Controlled Feedstock or EUTR-compliant biomass.

5.5.5 'SBP-controlled biomass' is biomass which is produced in compliance with all relevant SBP standards using the rules of an SBP-approved Chain of Custody (CoC) Systems and is derived from Controlled feedstock. It may physically contain SBP-compliant feedstock, Controlled Feedstock or EUTR-compliant biomass.

5.5.6 A single legal owner may supply SBP-compliant Biomass, SBP-controlled biomass, and Other Biomass. Other Biomass shall be physically separated and shall not be mixed in any Chain of Custody system.

## 6 Additional requirements

### 6.1 EUTR compliance

6.1.1 All inputs downstream of the biomass production process where mixing of SBP-compliant biomass with non-SBP compliant biomass takes place, shall have been determined to be EUTR compliant and shall have been subjected to 'due diligence'.

Note: The core of the 'due diligence' notion is that legal owners undertake a risk management exercise so as to minimise the risk of placing illegally harvested timber, or, timber products containing illegally harvested timber on the EU market.

The three key elements of the 'due diligence system' are:

- Information: The legal owner must have access to information describing the timber and timber products, country of harvest, species, quantity, details of the supplier and information on compliance with national legislation.
- Risk assessment: The legal owner should assess the risk of illegal timber in his supply chain, based on the information identified above and taking into account criteria set out in the regulation.
- Risk mitigation: When the assessment shows that there is a risk of illegal timber in the supply chain that the risk can be mitigated by requiring additional information and verification from the supplier.

Additional sources of information include

<http://ec.europa.eu/environment/forests/pdf/Basic%20minimum%20description%20of%20a%20DDS.pdf>

and

[http://ec.europa.eu/environment/forests/timber\\_regulation.htm](http://ec.europa.eu/environment/forests/timber_regulation.htm)

6.1.2 SBP certificate holders exporting SBP-certified biomass to countries under the scope of the EUTR shall exercise due diligence to ensure that these feedstock do not contain illegally harvested timber.

6.1.3 SBP certificate holders shall support their customers in applying their due diligence systems, as required in the EUTR.

6.1.4 SBP certificate holders shall comply with all trade and customs requirements including payment of any fees and duties.

### 6.2 Collection and communication of data for energy and carbon balance calculations

6.2.1 Energy and carbon data may only be supplied as SBP certified if the data collected are certified against the latest version of SBP Standard 5: Collection and Communication of Data.

## 6.3 Business integrity, social, health and safety requirements in CoC

6.3.1 The legal owner shall implement the requirements of either:

PEFC 2002:2013 Section 9: Social, Health and Safety requirements in CoC,

Or

FSC-STD-40-004 V2-1 EN Section 1.6: Occupational Health and Safety

Or the latest versions of these documents.

6.3.2 The legal owner shall determine and implement effective arrangements against corruption, proportionate to the nature and the scale of organisation.

6.3.3 The legal owner shall determine and implement effective arrangements to comply with all applicable laws, rules and regulations in countries where it conducts business activities.

## 6.4 Complaints

6.4.1 The legal owner shall determine and implement effective arrangements for communicating in relation to feedback, including customer and third party complaints.

# Instruction Note 4A: SBP tertiary feedstock requirements

Adapted from Reference Source: *FSC-STD-40-007 (V2-0) EN: Sourcing Reclaimed Material For Use In FSC Product Groups Or FSC-Certified Projects*

## 1 Suppliers: verification and monitoring

1.1 The BP shall conduct a verification process for its suppliers of post-consumer tertiary or reclaimed feedstock to determine whether this feedstock is eligible for entry into SBP product groups.

1.2 Validation shall include the following elements:

- a) For each supplier, the BP shall define the necessary evidence, actions and record keeping procedures to show that feedstock received complies with the SBP definitions of post-consumer reclaimed feedstock. These records shall specify:
  - i. Name and address of the supplier
  - ii. Type of Supplier (e.g. purchaser/ collector from point of reclamation, trader)
  - iii. Categories of reclaimed feedstock supplied
  - iv. Level of control required (e.g. visual inspection upon receipt, supplier audits).
- b) The BP shall monitor the compliance of its suppliers with SBP definitions and purchase specifications, and shall have a contingency plan to cater for non-compliant feedstock or documentation. For example, the BP might classify feedstock as non-eligible input for SBP products, request correction of purchase documents, or invalidate suppliers temporarily or permanently.

## 2 Feedstock inspection and classification upon receipt

2.1 Upon receipt, all reclaimed feedstock shall be subject to visual inspection and shall be classified into pre-consumer or post-consumer feedstock.

2.2 For all reclaimed feedstock received, the legal owner shall retain documentary evidence that the feedstock comply with SBP definitions for pre-consumer and post-consumer feedstock. Different types of evidence shall be retained for inspection by the CB, including feedstock samples, pictures, quality analysis reports, invoices, delivery notes and/or shipping documents, depending on the feedstock concerned.

2.3 In cases where adequate evidence for the classification of reclaimed feedstock as pre-consumer and/or post-consumer feedstock is not available at the point of receipt, the BP shall include the supplier in the supplier audit as described in section 3 (below).

2.4 In cases where feedstock received does not comply with purchase specifications and/or the quantities stated on the invoices are incorrect, the legal owner shall take immediate corrective actions, as

required in Clause 1.2 b (above). These actions shall be recorded and communicated to the CB during the annual audit.

2.5 In cases where the feedstock received is composed of mixed pre-consumer and post-consumer reclaimed feedstock, the BP shall either:

- a) Classify the full amount of feedstock as pre-consumer, OR
- b) Analyse and confirm the quantities of pre-consumer and post-consumer feedstock in the mix, as received. In this case, the supplier shall:
  - i. Declare in writing the quantities of pre-consumer and post-consumer feedstock in each feedstock mix received, AND
  - ii. Be included in the supplier audit.

### 3 Supplier audit for post-consumer tertiary feedstock

3.1 The legal owner shall perform annual or more frequent on-site audit of the suppliers as part of the supplier audit for post-consumer tertiary feedstock (including overseas suppliers) based on a justified sampling approach.

3.2 Traders or sales offices that do not take physical possession of reclaimed feedstock, and which do not alter, store or re-package the reclaimed feedstock may be verified remotely through desk audits.

3.3 The legal owner may contract another external, suitably qualified party to operate the supplier audit.

3.4 In cases where the supplier selected for sampling sells reclaimed feedstock that were previously collected, classified and traded by other companies or sites, the complete supply chain of these feedstock shall be audited back to the point where the classification as pre-consumer and/or post-consumer can be demonstrated through objective evidence.

3.5 For all feedstock supplied to it by the supplier under audit, the BP shall evaluate and verify documents and other evidence regarding the quantity, quality and compliance with SBP definitions of pre-consumer and post-consumer feedstock, including:

- a) Supplier's instructions or procedures put in place to control and classify the reclaimed feedstock
- b) When applicable, training or instructions provided to the supplier's personnel in relation to classification and control of reclaimed feedstock
- c) Registers that establish the origin of the feedstock (e.g. photographs, addresses of demolished buildings, invoices).

3.6 A declaration from the supplier, even if part of the contractual agreement, is not considered sufficient proof of origin and feedstock category. However, it can be used as additional evidence to demonstrate compliance of the feedstock with SBP definitions.

3.7 The BP shall document the supplier audits, including a record of the audit date, the audit findings, the names and qualifications of the auditors and examples of any evidence concerning classification of feedstock.



## Instruction Note 4B: Trademark use

Adapted from Reference Source: *Requirements for promotional use of the FSC® trademarks by non-certificate holders. FSC-STD-50-002 V1-0 EN and Requirements for use of the FSC® trademarks by Certificate Holders FSC-STD-50-001-V1-2.*

### 1 General requirements

1.1 The Sustainable Biomass Partnership (SBP) owns three registered trademarks: the SBP logo artwork, the initials “SBP” and the name “Sustainable Biomass Partnership”.



The SBP logo artwork

1.2 In order to use the SBP trademarks, the organisation shall have signed the SBP trademark licence agreement.

1.3 The SBP trademarks shall not be used in a way that could cause confusion, misinterpretation or loss of credibility to the SBP. SBP reserves the right to suspend or terminate permission to use the SBP trademarks if the organisation is failing to comply with the SBP trademark requirements as set out in this document. The interpretation of these rules is at the sole discretion of SBP.

1.4 The SBP trademarks shall not be used in a way that implies that SBP endorses, participates in or is responsible for activities performed by the company, outside the scope of certification.

1.5 The use of SBP trademarks shall not imply that SBP is responsible for the production of any products, documents or promotional materials.

1.6 Products which are promoted as SBP-certified shall be included in the organisation's certified product group schedule and shall meet the eligibility requirements for SBP claims as stipulated by the respective SBP standards.

1.7 Only the SBP logo artwork provided directly from the SBP secretariat shall be used.

1.8 The SBP trademarks shall not be used to promote product quality aspects not covered by SBP certification.

1.9 Claims regarding qualities outside the control of SBP (such as other environmental attributes of the product) shall be clearly separated from text about SBP.

1.10 The name “Sustainable Biomass Partnership” shall not be replaced with a translation. A translation of the name can be included in brackets but it should not replace the words “Sustainable Biomass Partnership”.

## 2 Applying SBP trademarks

2.1 SBP trademarks may not be used on biomass products.

2.2 The claims ‘SBP-compliant biomass’ and ‘SBP-controlled biomass’ may be used on documents related to biomass such as sales documentation, invoices and delivery documentation only where it refers to products which are included in the organisation’s certified product group schedule and that meet the eligibility requirements for SBP claims as stipulated by the respective SBP standards.

2.3 SBP trademarks may be used off product, including on stationery, promotional materials, business cards and brochures.

## 3 Formatting the SBP logo artwork

3.1 The SBP logo artwork may be used only in landscape or horizontal alignment.

3.2 The minimum size for the SBP logo artwork is 12mm in height.

3.3 When used on a non-white background a white space must be retained around the SBP logo artwork to clearly differentiate it from the background.

3.4 The following are specifically not allowed:

- a) Changing the SBP logo artwork including its colours, transparency, font or its proportions.
- b) Making the SBP logo art work appear to be part of other information such as environmental claims not relevant to SBP certification.
- c) Changing the shape or colour of the border or background.
- d) Rotating the SBP logo art work to anything other than a horizontal alignment.