**SBP Stakeholder Consultation – Consolidated Responses**

The stakeholder consultation took place from 27th March to 25th April 2014.

The subject of the consultation was the suite of five draft standards which together make up the SBP’s Biomass Assurance Framework:

- SBP Standard #1. Sustainable Feedstock Standard
- SBP Standard #2. The evaluation of Feedstock against the SFS
- SBP Standard #3. Certification Systems standard
- SBP Standard #4. Chain of Custody standard
- SBP Standard #5. Energy and Carbon data collection standard

In addition, there was a short consultation paper and a summary document – *Key Concepts in the BAF Consultation Draft* – providing an overview of the Biomass Assurance Framework as a whole.

Copies of the documentation were posted on the SBP website and an electronic feedback template was also provided to interested stakeholders.

**Stakeholder Input:**

In addition to the feedback SBP received from its own Sounding Board, 25 external stakeholders submitted their feedback. These stakeholders can be categorised into three groups of stakeholders:

- Economic (18 responses)
- Government/Regulators (2 responses)
- NGOs (9 responses).

The unedited feedback received is set out here in a single consolidated document.
**Respondent list (N.B. The Identifier Number is used to identify respondents’ comments.)**

<table>
<thead>
<tr>
<th>Id #</th>
<th>Respondent</th>
<th>Organisation type code</th>
<th>Nature of interest</th>
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**Later submissions/analysis (repeated under relevant sections above – listed here for ease of finding via identifier number)**

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### General comments or observations on the SBP standards

11:  
1. Many stakeholders raised concerns over the challenges facing operators of biomass generating stations and their supply chains, particularly in respect of the use of wood from non-certified forests. We recognise that in developing the Biomass Assurance Framework, SBP has engaged with many different parties from the supply chain to enable them to take a holistic approach. We see that the work of the Sustainable Biomass Partnership will provide valuable support for industry.
2. Ofgem has committed to benchmarking a number forestry certification schemes by the end of 2014 to support operators in reporting against the Timber Standard under the Renewables Obligation. Should the final version of the Biomass Assurance Framework be available at the time this benchmarking is undertaken we would like to include this within the exercise.

5:  
1. It is not clear between the Standards who is actually performing the SBE [sustainable biomass evaluation]: the BP [biomass producer], the CB [certification body] or a consultant.
2. The response below focuses mainly on Standard 1 as this will likely have the most impact on a BP like [Us].
3. All in all the documents look fairly good aside from a few issues.

14:  
1. Most indicators are too vague (e.g. “There is a positive contribution towards the local economy. “ – “Management planning aims to maintain or increase the health and vitality of forest ecosystems.”...). Generally speaking, the so-called “criteria” are more at the level of principles, the so called “indicators” are more at the level of of criteria, and the indicators have to be found in the guidance. The guidance helps to figure out what kind of evidence we are looking for, but they hardly help to draw the line between “low risk” and “unspecified risk” (e.g. several items are listed in the guidance: when do we consider an item is ok - do we expect all listed items must be ok or only some of them - if an item can’t be demonstrated, does it lead to unspecified risk or are we happy if some of the listed items looks ok, etc...). Without a more specific criteria and a guidance to decide between low and unspecified risk for each criteria, it is inevitable that different CB and different individual auditors will reach a different conclusion in front of the same set of evidence.
2. The indicators in the SBE should be rephrased to reflect the fact that a risk based approach is used. It is very different from an auditor point a view to validate a statement like “the forest management units comply with....” rather than a statement like “the pellet mill operator has a management system in place to minimise the risk that forest management units would not comply with....”
3. Some points regarding the general regulations appear to be missing:
   a. Sanction procedures? How do the deal with non-conformities/ non-compliances?
   b. Any regulations for solving periods for CARs?
   c. appeals, dispute resolution
   d. application and registration procedures (for CBs and for system participants)
1. In addition to our comments included within [all comments below], we wanted to point out that we had difficulty understanding how the process was designed to work until we finally understood that the SBE is the foundational process for implementing the SBP standard. Therefore, it might improve the understanding by the reader if the process were described earlier and in more detail to make the principles and indicators more meaningful. Perhaps Standard 2 could be traded with standard 1 so that it would be read up front. Similarly, Section 5 could be moved up toward the front of standard 2. The title of standard 2 was also confusing. Perhaps it would be better as something like this: “The Supply Base Evaluation; the standard defining the SBP Process.”

2. Plum Creek Timber Company is a large timberland owner in the US and manages its forestland sustainably using the Sustainable Forestry Initiative (SFI). We have extensive experience for over 15 years with third party SFI certification of our forest lands on a company-wide basis. We also have used SFI Fiber Sourcing (SFI-FS) and SFI Chain of Custody certification for over 15 years where we buy timber from other forest owners in order to provide evidence of sustainability. Plum Creek is interested in new markets for lower quality fiber represented by pellet markets because they allow us to use more of every tree harvested and provide an economic opportunity to thin our forests for improved forest productivity and health.

3. We appreciate the recognition of SFI as a PEFC endorsed standard by the SBP and the important role that it plays in the SBP standards. Having said that, over 80% of private forest land in the US south is not certified by any standard, yet strong evidence exists that these lands are sustainably managed because of the strong legal framework in the US combined with public support programs for family forest owners. In addition, SFI-FS has had a huge influence on the sustainability track record through its outreach programs, required adherence to Best Management Practices (BMP's), and by providing for required logger training as part of the program. These smaller non-industrial forest owners will be very important in supplying the emerging pellet industry, yet, in many cases, these forest owners may only harvest timber once or twice in their lives and pellet markets are not valuable enough cause a significant shift toward greater certification. We appreciate that SBP has designed an approach to assure sustainability from these non-certified lands.

4. We have one general comment which is our dominant theme in our comments regarding and concern about the SBP BAF.

5. We urge the SBP to explicitly recognize SFI Fiber Sourcing as a proven and effective approach in the U.S. for providing evidence of “low risk” for many, if not the majority of the SBP sustainability indicators. As it is SBP’s intent to build on and leverage, rather than replace or compete with existing processes or programs, this is a significant omission that SBP should correct. While the SFI forest management standard is endorsed by PEFC, SFI-FS and SFI-CoC have not been. This is because these programs were designed for the specific attributes of US forests and endorsement has not been deemed necessary. SFI is submitting comments and will describe the attributes of SFI-FS, which we include with our own by means of this reference. As a practitioner of SFI-FS for over 15 years for supplying our own mills, we have seen the track record develop and the program improve to make SFI-FS an important program for providing evidence of sustainability for non-certified forest lands, and also for advancing the practice of sustainable forestry in the US. The SBP should do what it can to perform whatever due diligence is necessary, such as benchmarking against similar standards, to credibly recognize the ability of SFI-FS to provide evidence of sustainability. If it is not possible to perform this due diligence prior to issuance of the SBP standard, an alternative would be to include a commitment to perform such due diligence at the earliest possible time.
1. Generally we think the proposed two options for proving sustainability, either through select certification schemes or through an alternative evidence-based approach, is very pragmatic and useful. We think this aspect of the scheme should not be lost above all.

2. We think the scope of the Supply Base Evaluation should allow for larger-scale, regional assessments from either independent pellet producers or groups of pellet producers. For example, rather than requiring a pellet producer to submit their risk analysis documentation only on the land area from which they are directly sourcing of material, the scheme would allow for the pellet producer to assess the entire state or province or region in which they operate, and allow multiple producers also operating in that same area to cooperate in that assessment. This would reduce the potential for externalizing any potential impacts of sourcing in one part of the region on another and requires a more holistic approach.

3. It would therefore also be useful to allow biomass producers working in the same supply base to provide the same or group evidence in order to prove compliance with the standard. It should above all not be a strict requirement that each biomass producer carry out their own risk assessment – this adds unnecessary cost to the system and also has the potential to create confusion and inconsistency in reporting within a single region.

4. The exclusion of SFI fiber sourcing certification from immediate qualification for compliance should be reconsidered by the SBP. The requirements of SFI fiber sourcing, including requiring best forest management practices (BMPs) from land where biomass is sourced, monitoring use of BMPs, and ensuring fiber sourcing supports sustainable forestry, are critical steps for ensuring sustainability of wood products and prove that the pellet producer is already sourcing feedstocks that follow applicable laws and meeting any criteria that relates to forest BMPs. BMPs in the United States are very rigorous, comprehensive, and meet most if not all the land-based indicators set out in the SBP. Many states in the U.S. achieve over 95% compliance with BMPs. With BMPs as a requirement under SFI fiber sourcing, this certification should at the very least reduce the requirements for additional work under the SBE, given the efforts the biomass producer will have already undertaken to ensure the sustainability of their feedstock. We recommend SFI fiber sourcing certified pellet plants should only be required to provide a risk assessment against indicators 2.1, 2.10, 2.11, 3.1, and 3.2.

5. The certification is proposed to take place at the level of the pellet mill. This is appropriate for economic, administrative, and logistical reasons, and is not less rigorous than if the certification were provided at the land level – pellet mill operators are only able to control the sustainability profile of the low-value feedstock they receive, not necessarily all the wood products developed on the land and the management decisions made around the higher value wood products. That said, the wording and phrases used in the list of criteria should be more careful in recognizing that pellet mill operators themselves are not able to control all aspects of land management, only put safeguards in place against feedstock that would not meet the criteria. [Edit note: the comments on specific criteria mentioned below are repeated in the relevant areas of this document]

   a. For example, criteria 2.1.2 says “The potential threat of forest management to High Conservation Value is minimised. A precautionary approach is adopted.” A more appropriate phrasing would be “The recovery of bioenergy feedstocks do not contribute to impacts on areas of High Conservation Value.”

   b. Another example: 2.1.3 says “Safeguards are implemented to protect rare, threatened and endangered species and their habitats.” This wording is better than 2.1.2, but it is unclear who is meant to implement the safeguards. It would be clear that the pellet mill implements the safeguards to make sure to source from land that is not putting these species types at risk.
c. Again, for 2.1.4, it should be made clear that bioenergy feedstock will not be sourced from land that was converted to plantations after January 2008.

d. Some criteria are currently acceptable as worded, such as criteria for setting the scope of the SBE, identifying personnel responsible for procedures, etc., where it is clear the onus is on the pellet mill operator.

e. A much more careful approach to the language and a focus on clarity around the requirements is very important to ensure that pellet mill operators are able to efficiently and cost-effectively follow and report against the standard.

6. We encourage maintaining the provision of flexibility allowing pellet mill producers to mix 70% SBP compliant feedstock and 30% controlled feedstock in order to comply with the standard.

7. These documents are written as though forest feedstocks are the only options for biomass. This standard should not be inadvertently worded in a way that excludes or does not account for alternative solid feedstocks that can be used in power applications – the standard needs to be broadly applicable to non-forest ecosystems and ensure that non-forest feedstock, such as grasses, dedicated bioenergy crops or other non-forest material, are not held to inappropriate standards directed towards forest material. Non-forest feedstocks should be considered compliant at this juncture. However, we propose that in the future a process should be developed whereby operators can develop ecosystem-specific protocols that can be verified against the SBP standard. This is critical for allowing alternative sustainable feedstocks into the market.
STANDARD: Sustainable Biomass Partnership

METHODOLOGY: Ecosystem-specific protocols based on STANDARD

VALIDATION: Independent ISO verifier (in cooperation with experts), verifies METHODOLOGY against STANDARD

VERIFICATION: Audit or certification of operator against the validated METHODOLOGY
With regard to SBP criteria effecting mill process residuals:

a. There is a direct relationship and implicit control over the forest harvest operation when a wood pellet manufacturer purchases wood from the forest to their gate. Sawdust originates from a sawmill. A pellet producer purchasing sawdust from local sawmills has very little control or impact over the sawmills procurement activities. It is important to understand that this doesn’t mean the independent sawmills harvest activities are unregulated nor a detriment to the environment.

b. For a pellet producer, it will be extremely difficult to verify full compliance of the SBP criteria back to the point of origin for a load of sawdust originating from local sawmills. A pellet producer could include the independent sawmills wood catchment in their own SBE and follow-up with periodic audits/visits to verify conformance and or develop mitigating strategies for any risk identified.

c. All sawmills in our area know the origin of the logs they purchase regardless of their own status as having a sustainability certification (SFI, FSC, PEFC). It is the law. Requiring sawmills to share specific information on the origin of their logs, to a sawdust customer (i.e. pellet mill) is problematic.

d. It is possible to work out a solution but the criteria must acknowledge this indirect relationship.

e. It would be a travesty to exclude sawdust, and other mill process residuals, simply because of our inability to walk on the forest from which [sic – the comments end there].

SFI Inc. supports the energy sector creating a platform to provide assurances that solid biomass used for energy production is sustainably and legally harvested. Specifically, we are pleased to see that SBP recognizes the value that forest certification provides in this context, and considers fiber from SFI certified forests to be compliant. Furthermore, a risk based approach for procurement is sound, and mirrors the approach that SFI created almost 20 years ago when designing the SFI Fiber Sourcing program.

Unfortunately, we feel that the SBP framework does not appropriately recognize the role of the SFI program, specifically Fiber Sourcing and Chain of Custody, in addressing the sustainability and legality requirements of the SBP. If the SBP truly desires to build on existing forest certification standards, then further recognition of the SFI program within the SBP framework would be worthwhile. This recognition would be consistent with the UK Timber Standard for Heat and Electricity, published by DECC in January 2014, which outlined requirements specific to the use of woodfuel and explicitly recognized the role of systems like SFI Fiber Sourcing as contributing towards evidence that the source of the wood is legal and sustainable and the traceability requirements are met.

Our comments are designed to present an overview of the Fiber Sourcing Standard, in terms of what it delivers on the ground and how it builds on a regional analysis to provide assurances of legal and sustainable fiber, in the North American legal and forest ownership context. These comments will hopefully provide greater assurances and understanding of SFI Fiber Sourcing, and encourage the SBP to more appropriately incorporate the Fiber Sourcing context into the SBP framework. Our comments are also designed to clarify the relationship between SFI and PEFC, in order to encourage the SBP to further recognize SFI Chain of Custody.
4. **SFI Fiber Sourcing**

   a. Across the U.S. southern states from which the pellet producers are sourcing wood fiber (Alabama, Florida, Georgia, Louisiana, Mississippi, North Carolina, South Carolina, Texas, and Virginia), over 16.7 million acres are certified to SFI, and another 12.4 million acres are certified to the American Tree Farm System (ATFS), another PEFC-endorsed standard. Approximately 1.8 million acres are certified to the Forest Stewardship Council standard. Therefore, 94% of the acres certified in those states are certified to a PEFC-endorsed standard.

   b. Nonetheless, almost 80% of forested acres in those states are not certified to any forest certification standard. Most of those forested acres are owned by family forest owners. Those owners have varied goals for owning forests and forest certification may not be cost-effective for them. It is for these very reasons that SFI designed its Fiber Sourcing requirements. SFI requires all SFI program participants — both those who own or manage forest lands and those who buy the raw materials they need — to demonstrate that the raw material in their supply chain comes from legal and responsible sources, whether the forests are certified or not. As highlighted in further detail below, objectives 8-20 apply directly to procurement organizations and should be viewed as a model program by SBP for what works in the context of the U.S. At a minimum, SFI Fiber Sourcing should be recognized at least as equivalent with PEFC controlled sources and FSC controlled wood, given that SFI Fiber Sourcing requires proactive actions along with the avoidance of controversial sources.

   c. When buying fiber from sources in North America that are not from a certified forest, SFI program participants must:
      
      i. Supply regionally appropriate information or services so forest landowners can identify and protect or create habitat for wildlife; reforest harvested lands, either naturally and through replanting; and protect riparian zones and water quality.
      
      ii. Provide implementation guidance for responsible forestry, addressing topics such as biodiversity, utilization, afforestation, invasive exotic plants and animals, and special sites.
      
      iii. Promote the use of loggers and resource professionals trained in sustainable forestry practices and, where possible, support logger certification programs.
      
      iv. Clearly define fiber sourcing policies in writing and make them available to suppliers — contracts for the purchase of raw material must include requirements for the use of best management practices to protect water quality.
      
      v. Implement a verifiable monitoring system.
      
      vi. Encourage landowners to participate in forest management certification programs.

   d. While there are select Criteria and Indicators in the SBP Sustainable Feedstock Standard that are not addressed in the SFI Fiber Sourcing requirements, the overwhelming number are in fact addressed through Fiber Sourcing in some capacity. In fact, SFI Fiber Sourcing requirements in several cases go beyond that which is required by the SBP Standard and therefore provides a platform that the SBP should be encouraging the use of. If SBP truly wants to incentivize uptake of forest certification in its supply basins, then greater recognition of SFI fiber sourcing would be beneficial.

5. **SFI Chain of Custody**

   a. SFI chain-of-custody certification extends into the marketplace by tracking fiber content from certified forest content, certified sourcing, and post-consumer recycled content. To be certified to SFI’s CoC Standard, companies must be audited to SFI Requirements: Section 3 – SFI Chain-of-Custody Standard. SFI requires that products certified to the SFI CoC Standard must avoid fiber from controversial sources — such
as illegal logging and fiber sourced from areas without effective social laws. SFI’s CoC approach addresses the non-certified forest content in products by requiring a risk assessment to avoid controversial sources and by demonstrating adherence to SFI Fiber Sourcing requirements through an audited procurement system.

b. SFI has never sought endorsement of its Chain of Custody standard by PEFC. However, the SFI CoC standard is highly consistent with the PEFC CoC Standard. SFI therefore recommends that the SBP framework standards, where appropriate, recognize SFI CoC on its own, since a significant portion of wood fiber is from North America and the PEFC CoC Standard is not widely utilized, particularly in facilities where secondary feedstock may be sourced.

6. **SFI Standard Revision Process**

a. SFI is currently in the process of reviewing and improving the SFI Standards through a thorough and transparent public review process. This has included two open comment periods, each 60 days long, ten workshops across North America, a multi-stakeholder standards-revision team, and an External Review Panel, comprised of government, academic, and conservation interests, committed to ensuring that every comment received was appropriately addressed. The draft new Standard includes new performance measures to conserve biodiversity in fiber sourcing; limit conversion of one forest type to another; bolster protection for indigenous peoples on private lands; and expand the definition of “controversial sources,” which are not allowed in SFI-labeled products. The new SFI 2015-2019 Standards will be available in January 2015. As such, we encourage the SBP, as its own standards develop, to review SFI’s developments and consider future alignment with the SBP standards.

7. **Specific comments on the “Key concepts in the Biomass Assurance Framework”**

a. As noted under our General Comments, feedstock (both primary and secondary) with SFI CoC should be accepted. Furthermore, under controlled sources, SFI fiber sourcing should be included as equivalent to FSC controlled wood or PEFC controlled sources.

9: We appreciate SBP’s participation in the site meeting with our external auditor. The comments below are intended to supplement feedback provided during this meeting along with additional questions or comments that arose after further review of the standard.

17: Overall the SBP approach seems to be appropriate given the lay of the land in the US and the sourcing requirements of the UK and other European countries. However, the effectiveness of such an approach will be highly dependent on how it works operationally. Also, the risk assessment approach is only as strong as the structure of the risk assessment and data available/used to assess risks. Also, given the amount of certified land in the southeastern US (or lack thereof) the SBE will be used quite frequently. Will there be a thorough case study for stakeholders to review about how the SBE applies in some concrete examples so that they better understand the steps in the SBE, SVP, etc.? Perhaps implementation of the pilots provides a useful opportunity to develop such a case study to help communicate how the system works. This would be valuable for a number of stakeholders not the least of which include pellet mill procurement staff.
2. Ultimately, some acknowledgement of the SBP framework by European governments will be necessary if it is to be considered as meeting the intent of their policies. Moreover, not to be underestimated is the need for acknowledgement and/or endorsement by non-governmental organizations given the role they play in either supporting or opposing bioenergy.
3. Moreover, care should be given with communications about this approach to the industry in the southeast who are likely to resist it. Why is 70% certified mix required vs. what the forest sector in the SE is currently is used to doing (i.e. up to 2/3 non-certified content through SFI mixed label)?
4. What options exist for pellet mills and the purchasers of their pellets to support additional certified forest lands through FSC and ATFS group certificates for instance? Given the lack of forest management plans and moreover the fact that many non-industrial landowners have even spoken with a forester, investments by the pellet sector to proactively work to get landowners in their supply area certified is definitely worth considering. There are likely models to do this that would not prove to be financially prohibitive.

8:
1. Overall this set of Standards is complex and detailed. The concepts document is not easy to follow for the non-cognoscenti and it needs a rewrite if this is going to be used widely. It is not very clear what how the different documents link together (either in the specific standards document or the Key concepts document). It is also not clear how the RA and SVP are differentiated, both in the documents and in assessment of the supply chain.
2. This complexity is brought to the fore because there is no simple description of what we are trying to do such as-
   a. This is aimed at a basic standard to deliver compliance- anything added beyond compliance is specifically added to improve credibility and acceptance
   b. The aim is to integrate with other management systems in place rather than to ‘re-invent the wheel’.
   c. Specifically state that SBP uses the TS criteria-if feedstock has a FSC or PEFC FM then there is a reduced set requirements, primarily around collecting GHG data.
   d. The certification is centred around the pellet mill and the systems it has in place to ensure use of sustainable and legal feedstocks—it is not a forest management standard
   e. The certificate which SBP will produce represents the delivery of regulation-compliant feedstock to the load port. Anything beyond that is the responsibility of the generator although SBP has provided guidance on what would be needed in order to maintain a SBP claim to a regulator
3. We must remember that we were charged with developing a Standard to deliver compliance. It needs to be benchmarked with other certification systems and deliberately incorporating them into the process so that a pellet plant can build on them rather than doing it all *ab initio*. The Risk Assessment process, for example, is likely to be bureaucratic especially for plant with SFI FS and extensive CoC in place already. (Suitable really for start-ups rather than top-ups.) There is a need in the Standard to identify (and write in) ways of minimising workload in practice. That is the remit from the SBP Board. We have already gone down that route by allowing plant with entirely FM supplies to ‘opt-out’ of the SBE. Most, if not all the US plant have extensive CoC and most have SFI Fiber Sourcing and hence the gap between the existing and the SBP process is not large with the pellet plant being confident that they can fill it without much difficulty. We therefore need to specifically cater for plant that has (say) 90% of the necessary information to hand without requiring them to start from a zero base. This point needs to be explicitly noted in the Standard
4. Secondary feedstocks criteria are sensible but they do not meet UK regulators requirements (all material to meet TS). This needs to be reflected in the Standard. Likewise the UK Regulator will require woody tertiary material to meet the Timber Standard.

5. The documentation needs to specify how we pass information along the supply chain. We have discussed this many times and it was agreed that all relevant information would be on the face of the SBP certificate (i.e. on the SBP website). This was to avoid the need for transaction certificates and for a supply chain bureaucracy. The form and content of the certificate needs to be in the Standard.

6. CPET is redundant—it needs to be replaced by Timber Standard throughout and the criteria modified accordingly

7. The guidance and the indicators must refer to documentation or procedures which apply to the plant being certified (the BP) and not to the forest. Suggest renaming Standard #1 as the Feedstock Compliance Standard. This is because much of the guidance is currently aimed at the forest owner and not the BP. There will be little/no information regarding direct management by the certificate holder which the CB can verify. There is therefore a universal need to rewrite the guidance to require the BP to set up a management system to collect relevant data through audits of sourcing/contracts and to develop a wider view of historical and future trends.

8. There is a need to explain the regional assessment approach in the preamble to the Standard. This needs to be tied in specifically to the Timber Standard since it gains its credibility from there.

9. Needs better clarification about what is in the Standard and what isn’t for the FSC/PEFC materials. Does criterion 2.10 on C-stock (for example) apply or not?

10. The whole consultation section needs review. SBP’s remit is to deliver regulatory compliance and not to develop a NGO-compliant system without specific authorisation from the Board.

11. It is not the CB’s responsibility to conduct a stakeholder consultation. This MUST be the responsibility of the BP. This whole section 8 of Standard #3 must be rewritten. We cannot require a CB to solicit for information and review all submissions. This is the job of the BP and the CB is there to make sure that it has been done properly and that all comments have been taken on board. It is not the CB’s responsibility to make judgements – simply to assess whether the BP is compliant with the Standard.

12. The form of the SBE (summary) report needs to be defined. My suggestion here is that for every criterion, we need to have a description of the risk and the actions taken, if necessary, to ensure a low risk. This also forms the structure of the audit report which compares the criterion with the pellet plant assessment and the auditor’s findings. In that way we can clearly see which criteria are satisfied through compliance with other certifications etc. SBP should add in a template of how the document should be shaped.

13. There are references in Standard #3 and #5 about CBs evaluating GHG calculations. These should be removed. This is a separate from the mainstream SBP process.

SBP Concepts paper

14. Need to have a process for ensuring recycled fibre is actually recycled. This applies on Page 5 para 2.4, Page 6. Diagram at top of page and Page 7 point 3.

15. Need to have a better description of how much Controlled Wood is allowed. This is fine on page 6 where the 70/30 split is explained but the diagram on page 7 could be improved by adding the fractions.

16. Need to make it clear whether the 30% Controlled Wood which is allowed with an FSC claim is part of the 30% Controlled Wood in an SBP claim.
17. Page 8 para 3.1. 2nd line Replace ‘infer’ with ‘determine’
18. Diagram on page 8 needs to make it clear that the 80/20 split is an example not a limit
19. General problem with repetition of similar sounding acronyms – SBP & SBE & SVP. Recommend changing SBE to “Regional Feedstock Evaluation” (RFE), and SVP to “Feedstock Supplementary Evaluation” (FSE)

6: General Comments on the Feedstock Standard

a. Because the SBP Feedstock Standard is based on either FSC or PEFC-endorsed CoC programs, it is expected that pellet producers will have already properly implemented requirements related to FSC Controlled Wood and/or the PEFC Due Diligence System. Thus, there are indicators in the Feedstock Standard which would not need to be re-audited if a company has a valid FSC or PEFC CoC certificate. These include:
   i. All indicators in Principle 1 (Biomass feedstock is legally sourced)
   ii. 2.1.1–2.1.4 (High Conservation Values, T&E species, conversion)
   iii. 2.3.4–2.3.5 (Training and growth drain)
   iv. 2.6.1–2.6.2 (Local Communities)
   v. 2.7 (Complaints process)
   vi. 2.8.1–2.8.5 (Worker rights)
   vii. 2.9 (Health & Safety)
   viii. 2.11 (GMOs)
   ix. All indicators in Principle 3 (Management system requirements)

b. As the SBP has stated, they do not intend to “recreate the wheel” when these established programs have been implemented extensively by companies already. Therefore, there is no need to re-audit the risk determinations of these indicators, as they have already been assessed by a certification body, as demonstrated by the valid certificate.

c. The Feedstock Standard is based on the CPET indicators for assessing sustainability and legality of forest management organizations. As a result, some indicators are inappropriate to assign to those operations which are procurement-only. In the US especially, companies that purchase fiber from suppliers have no jurisdiction or legal right over the landowners’ choices he or she makes for their lands. As long as they are within the bounds of the law, procurement-only companies have no mechanism to assert authority over landowners in their supply area. This is the exact reason why you do not find requirements such as these in current, established, credible forest certification programs. There are however, activities companies can take to promote certain values, such as reforestation, protection of T&E species, or protection water quality and monitor the effectiveness of their efforts. Our recommendations for how to meet the intent of these indicators as they are identified are our detailed comments below.

2. Risk Assessment Process
a. We’d like to reiterate that the SBE process is intended to be a risk assessment process – meaning and that we cannot be expected to verify every indicator at the tract level. Rather the goal is to assess the supply base for risk that there may be trends toward non-sustainable practices in the region. Further, procurement companies do not control landowner choices on their land and cannot be expected to “ensure” anything on source tracts. What we can do is look at the region and use our own and publically available data to provide a reasonable assurance that the intent of the indicators in the SBE are being met. It must be made clear through the phrasing of indicators, guidance and means of verification that the intent is to assess risk, not verify at the tract level, so that auditors know how they can assess conformance. We ask that the SBP re-look at the indicators in the SBE with this in mind and ensure they are written so as to be clear the intent and that the means of verification doesn’t default to tract level data.

3. General Comments on the Audit Process
   a. The way the standard is set up, it seems likely that the audit process could become very long and expensive. It is our understanding that the current process entails a visit to every pellet plan every year, and that these audits at each plant could include tract visits and stakeholder consultation. The SBP needs to more critically consider how this process will affect costs to pellet producers, and ultimate the utilities requiring SBP certification. For a company that has more than one production facility, this will likely mean literally 3-4 work weeks of audits, just for the SBE. The CoC and greenhouse gas evaluation would be additional time and expense. Also, PEFC and FSC certification audits only visit a subset of sites per year, and so this would not be able to fit seamlessly with current auditing timelines. In order to avoid spending unnecessary time and money on this audit process, the SBP needs to seriously consider a group certification method and also to refine the indicators in the SBE as suggested in our comments below in order to make the whole process more manageable. In addition, the SBP should also consider the fact that there are limited auditors who could complete the SBE and the CoC and GHG standard audits. As a result, at least initially, companies will likely still need to have 2 audit processes to cover all of the required standards.

4. Recognition of SFI
   a. It is still unclear if the SBP standard accepts SFI CoC in addition to PEFC and FSC. This is important because some companies only have a SFI CoC, which is not endorsed by PEFC. Because the SBE is separate from the SBP CoC, there is no reason that the fiber tracking program in the SFI CoC standard should not be recognized in the SBP CoC standard. If this is in fact the case and SFI CoC is accepted for SBP CoC, then the standard should be explicit about that.
   b. Regarding SFI Fiber Sourcing, we understand that the first order of business is to get a workable and credible SBP standard in the market place for companies to implement in advance of binding requirements in 2015. However, in working through the pilot process, it was very clear to our group that there is a lot of overlap in the requirements and auditing process between the SBE and SFI Fiber Sourcing. In fact, many of us who have a Fiber Sourcing certificate will likely use much of our documentation and processes as data to support our implementation of SBE indicators. We ask that the SBP commit to using the outcomes of the pilots and the first round of certification audits to the SBP to better understand how Fiber Sourcing supports the implementation of the SBE. In fact, it would be extremely helpful to companies, standard setting bodies and certification bodies if the SBP could draft some guidance that shows which SBE indicators are covered by existing certification programs (FSC, PEFC, SFI CoC and SFI Fiber Sourcing) and which require separate auditing. For the SBP
certification to be successful it needs to fit into current programs efficiently. Without some form of guidance from the SBP we may find ourselves being re-audited to the same criteria, which is wasteful of time and dollars.

5. **GHG Data Tiers**
   - a. It is unclear how the tier system works. Is Tier 3 the preferred Tier or is it Tier 1? This just needs clarification. We assume the best data is that collected from real operations, which is Tier 3, however in the cases where that information is not available, a company should have the flexibility to use peer reviewed research or acceptable default values.

6. **CoC Material Terms**
   - a. The difference between SBP Compliance and SBP Controlled feedstock is confusing. We understand through working through the pilot that the 30% allowed SBP Controlled Feedstock is basically a safety net if a mill receives fiber from an area outside of its SBE – sort of a “one off” risk assessment that has to be documented. This just isn’t clear in how the calculations and definitions are written. The definition of controlled feedstock sounds way too much like compliant feedstock and it has led many to believe that the feedstock coming in through the SBE only gets you 30% of your feedstock. It just needs to be clarified that the goal is to have all “compliant” feedstock, but should you receive fiber from an area you didn’t consider in your SBE then you can do a separate assessment and count it as “controlled.”

10:
   1. The standards are very well focused according to scale of management, and we think is a great idea to focus the fulfilment in the biomass producer, not in the forest owner or manager which should immediately increase the price of the raw material. Also, we think there is a great idea to give the producer the possibility to “audit” by itself to the forest owners, or control the documentation, and carry on only a documentary audit. Of course the recognition of PEFC and FSC certification schemes is great, even if those schemes do not recognise the SBP standard.
   2. In the other hand the focus on pellets is clear, and some things should be rewritten to open the standard to other cases of biomass production, such as chips for electric generation.
   3. As a general conclusion, we think that it is a very good job, the standard is consistent.
   4. We have no specific comments. We would like to participate in all the information generated from this standard and to be in touch to follow the process.

3:
   1. SBP is to be congratulated for the effort that is evident in the proposed standard. An overview of our comments is provided here and more detailed comments can be found in the appropriate sections of this document.
   2. Key positive elements of the proposed standard include:
      - a. We are pleased that SBP does not require an SBE for feedstock originating from forests certified under SFI, ATF and FSC. Given the high level of assurance provided by these standards, not requiring their inclusion in the SBE makes sense.
      - b. For material from forests that are not certified, the SBE’s use of a risk assessment is a practical and efficient method to demonstrate compliance with the SBP Standard. We are pleased to see such an approach.
3. Aspects of the Standard that we believe need further work include:
   a. There are Criteria and Indicators in the Standard (e.g., forest chemicals) that envision a higher degree of knowledge and control by the biomass producer of feedstock producers’ forestry operations than is likely or practical. In such cases the SBP should heavily rely on the robust system of laws and regulation found in the US.
   b. Criteria and Indicators related to biodiversity, habitats and ecosystems should rely on data that are readily available to biomass producers and should avoid being overly prescriptive.
   c. For Compliant Secondary Feedstock we are baffled that, while FSC controlled wood and PEFC controlled sources are accepted, SFI Fiber Sourcing is not. We believe SFI Fiber Sourcing with its requirement of growth/removal analysis, required use of BMPs, BMP improvement goals, logger training and landowner outreach delivers real on-the-ground results and is worth a second look by SBP.
   d. We also believe that the SBP Chain of Custody Standard should treat SFI CoC as equivalent to PEFC and FSC. PEFC has no mechanism to recognize SFI Fiber Sourcing. The fact that SFI has never sought PEFC endorsement for SFI CoC does not make it a less effective system. We believe that SBP should look at SFI Fiber Sourcing and SFI CoC on their own merits and we believe that such an examination should result in their inclusion.

4. As a general comment, we believe that SBP should at every opportunity consider the robust system of laws and regulations in place in the US during risk assessment.

5. We appreciate the opportunity to review and provide comments on the draft standard.

18:

1. The introduction of the SBP system indicates a will and a commitment to ensure the sustainability in biomass production, which we find very commendable. We are happy to see that the system makes it possible to base a sourcing of sustainable biomass on well-established systems with wide NGO support, such as the FSC. Added to that, we are happy to see that the SBP system will be fairly transparent as stakeholders will be given insight in summary audit reports.

2. However with that being said, we do have some great concerns with regards to the suggested design of the system:
   a. The system is extremely complex and difficult to comprehend
      i. The mix of SBP, FSC, PEFC and SFI requirements for forest management, chain of custody, mixing of biomass, accreditation and certification procedures makes it extremely complicated to grasp the boundaries of the system and particularly the real minimum requirements.
   b. The risk assessment approach is not credible
      i. The risk assessment is similar to the system which was developed by the FSC, with the introduction of the Controlled Wood System, which was meant to exclude controversial sources of wood via risk assessments carried out by chain of custody certified companies. The experience showed however that this was not feasible, as the companies carrying out the risk assessment had problems understanding the issues, had difficulty finding credible information and had a tendency to determine low risk far too often, as this would free them from developing complicated company verification programs and carrying out field assessments. But where the FSC
system sought to exclude five basic categories of unacceptable sources of timber (illegality, indigenous peoples rights, GMO, conversion and destruction of HCFV), the SBP will require companies to do a much more complicated risk assessment of issues, that under any credible certification scheme would require an onsite visit by a qualified and experienced auditor. This is simply not a credible approach.

c. **The system dilutes the concept of sustainable forest management**
   
   i. By equating the systems SBP, PEFC, SFI and FSC the SBP system is in effect diluting the definition of sustainable forest management, as no distinction is made between the four and no reward is given to companies opting for the highest standard, in this case full FSC certification. Under the FSC system, controlled wood (which may be based on a risk assessment) is the absolute bottom and consists of timber, which may be mixed into a certified product. Controlled Wood is not considered sustainable in itself. However under the SBP framework, SBP biomass is considered ‘sustainable’ alongside FSC certified product. A comprehensive FSC certification with full stakeholder involvement, field assessments and third party verification is thus equated to a risk assessment carried out by a pellet producer behind a desk who hasn’t even necessarily visited the forest in question.

d. **The system does not promote a move towards certification**
   
   i. As no reward is given to companies opting for a higher standard than required (FSC), companies are not encouraged to move from a simple SBP risk assessment of their sourcing base to a full FSC certification of the forest resource. The system is therefore not promoting certification but rather enabling pellet producers to maintain the status quo.

e. **The criteria for sustainable forest management (SFS standard) are vague and not auditable**
   
   i. While it is commendable that the SBP Sustainable Feedstock Standard seeks to cover a broad range of important topics related to sustainable forest management, in reality the existing criteria are worded too vaguely and as a consequence are not auditable as they fail to specify clear limits and requirements.

   ii. One (of many) specific example could be criterion 2.5 ‘Management of the forest ensures that biodiversity is maintained’. The indicators require the forest manager to conserve/protect key ecosystems and species of outstanding or exceptional value, but the definition of what the concept ‘key ecosystems’ or ‘species of outstanding value’ is, is so vague and unspecific, that almost any definition would be applicable, as the standard merely suggests what could be considered and refrains from dictating what shall be considered. Added to that, the means of verification state that the auditor should do nothing more than study documents – such as maps, standard operating procedures, codes of practice etc.

3. **Recommendations** Based on the concerns described above, we recommend the SBP to:
   
   a. Distinguish between certification standards – if the SBP framework is in reality introduced, please specify that a SBP risk assessment is a small but important first step, and include a mechanism in the system, which promotes a move to the exclusive use FSC certified biomass in the future.

   b. Consider the more cost effective option, of halting the development of the SBP system (standards #1 - #4) and instead use the FSC system as a stepwise approach towards exclusive sourcing of FSC certified biomass. This could be done by requiring companies to proceed through the following steps:
i. Map their supply chains
ii. Exclude all illegally produced biomass
iii. Increase the amount of FSC controlled wood sourced (annual increase in percentage of volume)
iv. Increase the amount of FSC certified biomass sourced (annual increase in percentage of volume to 100 pct.)
c. These recommendations would enable the SBP to promote existing credible certification schemes and thus contribute to a sustainable development.
d. The world does not need a new forest certification system, there is already an abundance of these.

2:
1. America’s private forest landowners are a sustainability success story due to our healthy markets for forest products and a framework of laws and regulations that ensure our ability to sustain timber volumes, protect the environment and provide economic value to our communities. Although a track record like this easily demonstrates what we are capable of, we know it does not always offer all of the assurances necessary to allow full participation of US wood in the growing renewable’s marketplace in Europe. This is why we offer the following comments to the Sustainable Biomass Partnership on your Biomass Assurance Framework.

2. After reviewing the standards, principles, criteria and indicators it is easy to see how you are attempting to achieve your vision of an economically, environmentally and socially sustainable solid biomass supply chain but it is hard to see how you are not competing with or replicating SBP recognized certification schemes. It is for this reason that we encourage the SBP to attempt to modify their Sustainable Feedstock Standard to focus on Biomass Producer processes and away from the feedstock itself. The criteria and indicators are clearly weighted to the producers but stray into the feedstock in a number of areas which we have commented on specifically below.

3. We also believe that the strong framework of laws and regulations in the US would qualify most of the criteria as low risk, but we are concerned with the interpretation of unspecified risk and the potential need for a Supplier Verification Program leading to site visits to private landowners’ property to ensure standard compliance. This is far reaching and unprecedented in the US and has the potential to cause friction in the supply chain for biomass producers. In addition, enforcing a Supplier Verification Program will be difficult due to private property rights protections in the US.

4. Finally, we would remind the SBP that sustainability is achieved with free, open and vibrant markets that promote profitability and economic gain for America’s private forest landowner. Any unnecessary restrictions that create barriers to trade or reduced access to markets negatively impact sustainability. US private forestlands can be the solution to your renewable energy needs, if we can work together on a policy framework that truly promotes the sustainability of private forest landowners.

5. Thank you for the opportunity to comment and we would welcome any questions or clarifications.

12:
1. In general, the standards are well written and concise. There are some, in my view, inconsistencies in wording between various standards, all of which can easily be clarified.

2. A simple decision tree identifying the steps would be beneficial—something like:
3. A suggestion which may assist in keeping the standards current longer is to reference the broader governing bodies and what is acceptable and not identify what is not acceptable. For example, stating “internationally accepted chain of custody certification and forest management certification by FSC and PEFC”, this will eliminate any national/international certification that is not FSC or PEFC endorsed.

4. In standard #1, remove web links in the guidance cells as web links can make the document dated very quickly and if the web links are considered necessary, then government web links ought to be present as well; which if you place all relevant government web links from all countries shipping
pellets. Similarly guidance ought to be in the form of statements and not questions, it is relatively easy to convert the existing questions to statements.

5. It is very challenging to reconcile terminology used in one manner in a nation and in a different manner in a different nation. Similarly, it is challenging when one nation uses internationally submitted data/information for a purpose that is different from the international purpose.

6. While non-governmental organizations provide a useful, occasionally single focused, purpose and data/information to publics, governments also provide data/information as well.

7. With respect to standard #5, default values ought to be nation based rather than a single default value for all nations.

8. I could not find what CPET means and a web search did not provide any clues, most results were related to “Cardio Pulmonary. Exercise Testing”.

9. There may be value in having a preamble identifying the adherence to the local laws takes precedence meaning the certification and reviews of certification are not the venue to initiate change which is not in control of the pellet producer. For example here in Ontario, we have a encompassing set of laws, regulation and procedures relating to “ high conservation values” and it is illegal for a forest management unit, forest harvester, forest product producer, farmer, land owner, etc to create a high conservation value area and for a third party reviewer to demand/request that be done is unrealistic and likely exceeds the bounds of their authority.

16:
1. It is stated that this set of standards is to be used together with FSC or PEFC standards.
2. It is highly confusing and redundant for this set of standards to duplicate requirements found in in those certification schemes, as there will be inevitable differences of interpretation.
3. It would reduce cost for everyone involved if these standards were strictly additional to FSC and PEFC standards with no overlap.
4. Admittedly, PEFC standards are all different depending on which national standard is being enforced, so it is impossible for SBP to be strictly additional to PEFC. Therefore PEFC is not a useful reference point for SBP, and the specific national standards used by PEFC (e.g. USA, Canada) should be quoted as base references instead, and SBP should be an additional module specifically tuned to each one.
5. Alternatively, where there is overlap, SBP should state specifically that when used in conjunction with another specific standard, the conditions in that standard explicitly replace those in SBP. The SBP standard should have a section specifying the base standard it is being used in conjunction with and listing the clauses which are being overridden by that standard.

13: **Comments on the Key Concepts document:**
1. **2.3 - Standard #2 indicates "Where an Indicator is scored as Unspecified Risk, Mitigation Measures must be taken to reduce the risk level to Low Risk."** However, the Key Concepts document indicates "For any indicator which is scored as Specified Risk the pellet mill must put in place mitigation measures to manage the identified risk so that it can be considered controlled and hence as low risk." Consequently, the relationship between Unspecified Risk, Specified Risk, and mitigation measures may be more clearly defined.
2. 2.4 indicates that the "SBE does not need to be undertaken for...Feedstock received with a certification claim under FSC or PEFC approved schemes, including SFI". However, later it indicates that the SBE must be undertaken for primary and secondary feedstock that is not received with an FSC or PEFC claim. This seems contradictory and it is not clear if SFI certified material is exempt from the SBE.

3. 2.5 – SBP Compliant Feedstock:
   a. Does "full" FSC or PEFC approved claim equate to material that is supplied with an FSC or PEFC claim that is not "FSC Controlled Wood" or "PEFC Controlled Sources"? This may be more clearly defined.
   b. It is not clear why material supplied with other FSC or PEFC claims (vs. only an "FSC Controlled Wood" or "PEFC Controlled Sources") would not constitute an eligible input to SBP compliant Secondary Feedstock.

4. 3.2 - The mixing graphic seems to convey the concept of the credit system. It might be worth adding text that such mixing is governed by the credit system concept.

21: [Edit note: The comments from this respondent are contained in a letter with multiple references in the footnotes, the references are not copied over to this document]

1. The Southern Environmental Law Center (SELC) appreciates the opportunity to submit these comments on Standard 1 and Standard 5 of the SBP Biomass Assurance Framework (BAF). We find the Sustainable Feedstock Standard and the Energy and Carbon data collection Standard inadequate to address the severe, ongoing adverse forest, biodiversity, and carbon and climate effects of current and projected EU wood fuel pellet sourcing in the southern United States. While the standards have some useful language in them, they fail to provide any firm restrictions on sourcing wood pellet fiber from forests and wetland forests that are highly valuable for their carbon storage and wildlife habitat and biodiversity. In sum, there are no firm restrictions on sourcing from intensive harvesting including clear cutting of bottomland hardwood forests or other high conservation value forests. Without clear restrictions, we can expect major pellet suppliers to continue to source heavily from these areas.

2. SELC also supports and joins in the comments of the EEB and Birdlife International that address the overall SBP BAF and Standards one through five.

3. **Standard # 1: Wetlands and other high conservation/biodiversity value forests are not protected** [Edit note: Some of these comments are also copied into the relevant sections below where section numbers have been given]
   a. The SBP Principle 2 (sustainably sourced) and Criteria provide no assurance of protection of forested wetlands.
   b. Criteria 2.1 (High Conservation Values (HCV)), 2.2 (harm to ecosystems minimized), or 2.5 (management ensures biodiversity is maintained) do not include provisions that would ensure that forested wetlands are not harvested or even clear cut for fuel pellet production.
   c. Forested wetlands could be included in high conservation value forests or high biodiversity forests (criteria 2.1 or 2.5), but there is no requirement to include them.
   d. Furthermore, there is no requirement to protect high conservation value lands that are identified, only a call to minimize the potential threat to High Conservation Values.
   e. Likewise, there is no requirement to include forested wetlands in “key ecosystems and habitats” under Criteria 2.5.
f. Thus, if the supplier is sourcing out of wetlands, as described below, it will have no incentive and no requirement to include wetland forests in their HCV or key ecosystems findings.

g. In addition, reliance on FSC and PEFC for “controlled primary feedstock” does not provide protection for forested wetlands in the U. S. FSC does not preclude wetland harvesting, nor does PEFC or SFI.

h. The bottom line is that neither FSC or PEFC prohibit clear cutting wetland forests in the U.S. The SFI Forest Management standard (Objective 6) only covers forests with G1 and G2 species and ecological communities. With reference to FSC, Principle 9 (Attachment 1) calls for maintenance of High Conservation Value Forests (HCVF), but there is no requirement that wetland forests be included in the HCVF listing. It is possible some wetland forest could be listed but no such requirement. Also one can arguably maintain a wetland forest if you clear cut it and let it grow back. It might take 80 to 100 years but you are arguably still maintaining it.

i. Likewise one can argue he is maintaining the high conservation values, if not converting the forest to other forest types or a different land use. This argument will be made, despite the fact that the carbon storage and the wildlife habitat provided by mature bottomland hardwood forests will be absent for many decades.

j. Contrary to suggestions made periodically, the EU biofuels standards (RED) does not protect against wetland clear cutting either- only against conversion of wetlands to another land use. See Attachment 2, RED re liquid biofuels.

k. Also, U.S. law allows wetland clear cutting. There are voluntary best management practices that should be followed, but no restrictions on clear cutting. Thus, without some clear prohibitions on the practice from the UK or EU, wetland clear cutting for EU biomass will continue. EU and UK demand will continue to degrade and destroy extensive wildlife habitat and deplete U.S carbon stocks, as discussed in section III below.

4. Standards #5 and 1: The scheme does not provide any guarantee of carbon emission reductions from the use of certified pellets.

a. Standard 5 of the BAF requires collection of data and monitoring of the energy use and GHG emissions throughout the supply chain in order to provide information to the energy generators. However, the data requested fails to cover a critical piece of the carbon balance. It fails to require any monitoring of carbon stock changes in the forests, where harvesting has taken place. The changes in these carbon stocks are an order of magnitude more significant than the emissions during the supply chain. The Standard fails to acknowledge the well-accepted carbon debt created when standing forest are used for power production. U. S studies have documented this carbon debt, potentially over 100 years for MA forests and 35 to 50 years for SE U. S. forests. See BERC and SIG, “Biomass Supply and Carbon Accounting for Southeastern Forests” Feb. 2012.1 However, this SE U.S. carbon debt period was premised on the use of trees of less than 12 inches in diameter for hardwoods and 10 inches for softwood. As noted below, trees up to 26 inches in diameter are being used for pellet production. With larger, older trees the carbon debt period is certain to be longer, particularly in slow-growing bottomland hardwoods.

b. Indicator 2.10.2 of the Standard # 1 does point to taking note of the forest carbon stocks as well, stating “carbon accounting demonstrates that harvesting does not diminish the capability of the forest to act as an effective sink or store of carbon over the long term”. Unfortunately, this is also a poorly defined criterion which won't require measuring the GHG balance of the harvesting carried out for the purposes of the biomass producer, specifically. The wording also allows depletion of carbon stocks in the next several critical decades. Importantly, neither standard 1 nor 5 make an effort to minimize the ‘carbon debt’ created when burning wood directly for power production.
5. **U.S. pellet exporter sourcing from wetland forests in North Carolina and Virginia**
   a. Enviva is one of the largest suppliers of wood fuel pellets to EU and UK utilities. Extensive documentation and analysis has made it clear that Enviva sources from carbon and wildlife rich forested wetlands in VA and NC. Claims that Enviva produces wood pellets primarily from mill residues (including sawdust), tops and limbs, and other logging residues have been repeatedly discredited. In fact, investigations at Enviva’s existing production facilities in North Carolina by the BBC, Daily Mail, and The Wall Street Journal have revealed that Enviva uses large quantities of whole trees to make wood pellets, including hardwoods from wetland forests. Enviva now acknowledges that they use trees up to 26 inches in diameter, but simply maintains it does not use saw logs that could be sold to a saw mill. It generally no longer denies that it uses hardwood pulpwod that can be as much as two feet in diameter.
   b. Sourcing whole trees for wood pellet exports has dramatic implications for Virginia and North Carolina’s forests. For example, at scheduled production levels (assuming 80% hardwood sourcing), Enviva’s three pellet plants in northeastern North Carolina and southeastern Virginia, along with two proposed mills in SE North Carolina will require cutting approximately 30 square miles of hardwood forests in the sourcing area every year, and 750 square miles of forest over a 25-year period. Even if a forest is not harvested exclusively for biomass, biomass sourcing may increase the intensity of harvest by shortening harvest cycles and removing more woody material from the forest. Increasing the intensity of harvest may adversely impact biodiversity, water quality, soil fertility, and forest ecology.
   c. There are currently no standards to ensure that North Carolina’s forests are sustainably managed, and only a small fraction of North Carolina’s privately-owned forests, which constitute around 85% of forestland in North Carolina, are certified for sustainable harvest. Indeed, in its 2010 report to the legislature on the development of the wood biomass industry in North Carolina, the North Carolina Environmental Management Commission found that “[t]here are currently no standards or guidelines that require the sustainable management of the utilization of woody biomass.” The Commission further found that the “market for biopower will create pressure on the sustainable use of our forest resources” and recommended “the adoption of forest management guidelines [or] third party sustainability standards [that will be] protective of forest productivity, wildlife habitat, riparian buffers and other sensitive areas.” To date, North Carolina has not developed, adopted, or endorsed generally agreed upon standards to ensure the sustainability of forest harvesting for wood pellets, let alone written binding standards into law.
   d. Environmental impacts are only increased when biomass harvesting occurs in areas dominated by sensitive and ecologically-important forest types, like wetland forests. A recent analysis of sourcing for Enviva’s existing production facility in Ahoskie, NC, projected that over 68,000 hectares of wetland forest may be at risk. The study found that 46-63% of the long-term sourcing area for hardwood biomass would be forested wetlands. These wetland forests provide critical habitat for a wide variety of the Southeast’s most imperiled species. See also SELC “Wood Pellet Industry Destroys Forests and Harms Birds of Conservation Concern.” The U.S. Environmental Protection Agency estimates that 60 percent of the Southeast’s wetland forests have already been destroyed. Despite this loss and their high ecological value, there are no regulations to ensure that wetland forests are protected from high-intensity logging, and forestry certification programs do not currently prohibit wetland logging.
   e. There are also strong indications that an expanding wood pellet industry will compete for material with the pulpwood and composite wood industries. In the absence of a home building boom, wood pellet producers cannot rely extensively on sawtimber residues for their wood
Instead, wood pellet producers will likely continue to source the same whole trees that the pulpwood and composite industries are targeting. This is a problem because pulpwod industry demand is holding steady or increasing across the Southeast. Thus, there is a real risk of overharvesting in certain woodsheds. In the Enviva woodshed in SE VA and NE NC, U.S. Forest Service Forest Inventory Analysis (FIA) data showed that removals of bottomland hardwoods exceeded growth 3 to 1 in the 2007 report. While removals decreased in the recession, as Enviva ramps up its demand, with three plants on line in this woodshed as of 2014, there is clear potential for bottomland hardwood inventories to decline further.

6. Thank you for your careful consideration of these comments.

[Edit note 1: The comments from this respondent are contained in a letter with some references in the footnotes, the references are not copied over to this document]

[Edit note 2: Some of these comments are copied into the relevant sections below where section numbers have been given]

1. The signed NGOs BirdLife Europe, Bond Beter Leefmilieu Vlaandren, European Environmental Bureau, Dogwood Alliance, Latvian Ornithological Society, Natural Resource Defence Council, the Southern Environmental Law Center and the WWF European Policy Office consider that the framework is not fit for purpose to support serious efforts to tackle the sustainability problems around a significant increase in biomass use for energy.

a. Most importantly, the vague and loose criteria and indicators of the Sustainable Feedstock Standard and the level of proof required, fail to make the BAF a credible certification scheme capable of reassuring consumers that pellets used do not contribute to environmental and climate damage. The BAF also misses an honest assessment of the most problematic issues related to the sustainability of pellet manufacturing, such as control mechanisms to ensure that timber wood is not used for energy only or to ensure that only low climate impact biomass feedstocks are used.

b. The main concerns of the NGOs are detailed below. The feedback given focuses on the overall building blocks of the BAF and its credibility. The NGOs defer from more detailed feedback on individual criteria etc. at this stage since given the loose definitions and ambiguity of the overall framework do not allow such an analysis.

2. **Key concepts of sustainability standard are too vague**

a. In the Sustainable Feedstock Standard, which defines sustainability as understood in this framework, only the Indicators of each Criteria are normative. Even if the criteria and indicators show a good intention to cover all the aspects of sustainability, the indicators alone are far too vague and too poorly defined to actually guarantee a level of sustainability and to give an understanding of what is happening on the ground. The standard does provide examples of means of verification and guidance but these are not normative and biomass producers could therefore not be required to use the guidance.

i. For example indicator 2.6.1 states “The legal, customary and traditional tenure and use rights of indigenous peoples and local communities related to the forest are identified, documented and respected” without setting any requirements on how sufficient respect should be proven. This leaves it to the biomass producer to decide whether rights of others have been respected or not. A
The normative requirement of ‘free prior and informed consent’ should be included as a minimum, instead of just referring to it as a guidance.

ii. Indicator 2.1.2 states that “The potential threat of forest management to High Conservation Values is minimised. A precautionary approach is adopted.” The standard does not require any kind of definition of HCV, which would be wise, as it is one of the most debated concepts in FSC certification (for example). This gives the biomass producers the liberty to say that all HCVs have been covered by national protected areas, for example, which is rarely the case. The indicator also does not require producers to conserve HCV but allows their destruction if some evidence can be produced showing that the biomass producers tried to avoid it. In the common sourcing region of the energy utilities involved in the SBP, clear cutting of natural wetland forests is an obviously environmentally destructive practice but based on our interpretation of the SFS, it would not bring any relief to this problem. An exact definition of HCVs is essential to any credible certification.

3. **Certification at pellet mill level without site inspection is inadequate**
   a. The Supply Base Evaluation (SBE) is an effort to evaluate the forest management practices of the contractors of the pellet mill, including the origin of the wood etc. Still, this evaluation can happen and be approved without any kind of verification in the forest neither by the biomass producer itself to check the practices of its contractors or by a third party certification body. The SBP standard 2 (Evaluation of the feedstock against the SFS) suggests that the biomass producer may use third parties such as supplier or harvesting contractors to provide evidence that indicators are low risk but none of this is required. The evaluation can be done as a desk-based exercise only. As a minimum, sample areas within the supply base should be verified on the ground as they would with any forest management certification.
   b. The interval of the desk-based SBE is also too long. Undertaking the SBE only every five years does not provide a credible guarantee of sustainability, considering that contractors and even the extent of the supply base can easily change several times during a five year period. Evaluations should be yearly as they are with most forest certification schemes.

4. **The risk assessment procedure is poorly defined and vulnerable to bias**
   a. The SBE is carried out by means of a risk assessment, identifying a low or unspecified risk for not meeting each indicator’s requirement. If an unspecified risk is identified a Supplier Verification Program needs to be carried out and mitigation measures implemented and monitored to reach the status of low risk. As already outlined above, the SVP or mitigation measures also do not require any verification on the ground, and no requirements for the quality of the mitigation measures are given. This gives little assurance of the effectiveness of these measures. ‘Standard 2’ can be interpreted so that a mere written statement from the biomass producers stating they will do their best to avoid the risk, would likely be enough, without a guarantee of actual changes in the operations. A threshold which would lead to the biomass producer not to be compliant with SBP certification is hard to see.
   b. The standard refers to the risk assessment carried out as part of the FSC Controlled Wood (CW) standard. Whereas the risk assessment approach can in some cases be sensible, it is worth noting that in FSC it is only used for the non-certified material that can be used to mix with certified material up to a certain amount. The SBP builds the credibility of its whole systems on the risk assessment. Experience with FSC has also shown that risk assessments carried out by the companies applying for certification themselves have proven problematic when it
comes to more disputed issues. The FSC is there for moving to national risk assessments that builds on the expertise of a range of stakeholder groups. The SBP risk assessment is likely to face the same problems as the FSC CW standard.

5. **The scheme omits the main source of carbon emission from the use of certified pellets**
   a. ‘Standard 5’ of the BAF requires the collection of data and monitoring of the energy use and greenhouse gas (GHG) emissions throughout the supply chain in order to provide information to the energy generators. The requirements of the standard show only very limited knowledge of the full carbon balance of the pellets, since it doesn’t require any monitoring of carbon stock changes in the forests, where harvesting has taken place. The changes in these carbon stocks are an order of magnitude more significant than the emissions during the supply chain. The standard also sets only criteria for the GHG emissions, not even for the supply chain. It therefore gives no assurances of positive climate impacts, but only (partly) monitors them.
   b. Indicator 2.10.2 of the Sustainable Feedstock Standard SFS points towards taking note of the forest carbon stocks as well, stating “carbon accounting demonstrates that harvesting does not diminish the capability of the forest to act as an effective sink or store of carbon over the long term”. Unfortunately, this is also a poorly defined criterion which won’t enforce the measuring of the GHG balance of the harvesting carried out for the purposes of the biomass producer, specifically. The wording of the indicator does also in fact allow depletion of carbon stock.
   c. Additionally and importantly, neither standard 1 nor 5 make an effort to minimize the ‘carbon debt’ created when wood is burned directly for energy.

6. **Certification procedure unclear**
   a. The documents under consultation also do not provide any explanation as to what the outcome of the SBP certificate is, what are the labels associated, how can they be used by energy utilities and what would the possible labels actually guarantee. The scheme doesn’t seem to provide a solid basis and clear guidance for the third-party verification of the pellet mills.
   b. The several exemptions of the BAF concerning materials certified by other schemes and non-primary wood resources, the fact that mixing of non SBP certified materials in the pellets is allowed and that energy generators can also use non-certified materials mixed with certified materials make the scheme hard to understand, potentially confusing and ineffective as a result.

23: [Edit note: Some of these comments are copied into the relevant sections below where section numbers have been given]

1. As you know, we are member of the SBP Sounding Board. We have agreed to take part as we are interested in ensuring that biomass use for energy purposes complies with two objectives:
   a. a substantial contribution to mitigating climate change through reduction of green house gas emissions and
   b. prevention of negative impacts on ecosystems and people due to its production. As you understand, we consider ourselves experts in particular in preventing such negative impacts as far as forests are concerned, and this is supported by governmental and other stakeholder recognitions.
2. We appreciate the work put into the standards. For assessing them we have used our own standards as benchmarks, as these are the result of extensive and continuous balanced multi-stakeholder processes and informed by 20 years of experience. We have prioritized a response to your standards 1 (Sustainable Feedstock Standard) and 3 (Certification Systems Standard). We have also some comments on Standard 4 (Chain of Custody of Standard), but please do not regard these as complete.

3. Our detailed comments on Standard 1 are based on a comparison with the FSC US National Standard, as we assume that the SBE approach will be used mainly for sourcing from the South East USA. The US National Standard is based on the FSC International Principles & Criteria and can be considered representative for these for the US context.

4. We also compared the requirements of Table 1 with FSC requirements for controlled wood. [NB: Not copied below as don’t know the location of Table 1]

5. Our comments on Standard 3 are based on an assessment of what would be required to ensure adequate quality control of risk assessments and possible mitigation actions.

6. However, we would like to make it very clear that our comments on specific elements cannot be taken as a general endorsement of the Biomass Assurance Framework (BAF). We have fundamental objections against the structure and essential elements of the BAF, which we express below:
   a. The key actor in the BAF related to the forest impacts is the pellet mill, which is to apply a regional risk assessment approach. Such an approach does not guarantee performance of individual forest management units, and that is not required either. For FSC this is an unreliable method of ensuring sustainable forest management. We cannot accept this as equivalent to FSC forest management certification and as a guarantee of sustainable forest management as such.
   b. The BAF considers not only FSC FMU certificates as compliant but also PEFC (which means SFI and ATFS in practice). We are not convinced SFI and ATFS give sufficient guarantees for sustainable forest management.
   c. We disagree with your approach to assess secondary feedstock against the minimum list of indicators of your feedstock only. In fact, this reduces the status of secondary feedstock to “controlled”, but in your scheme it is counted as “compliant” and gives the impression that its origin has been assessed against the full set of sustainability criteria.
   d. While FSC also allows mixing, to a certain extent, of certified materials with controlled materials, we require that this is clearly communicated to the client, through claims that specify the % of certified content or with the “FSC Mix” label to the final consumer. We regard a claim “SBP certified” which includes “controlled feedstock” as misleading. This is even more important if taxpayers money is expected to be used for supporting biomass use exclusively from sustainably managed forests.
   e. While the Sustainable Feedstock Standard touches on a number of the important sustainability issues, some crucial gaps exist and the proposed standard has significant weaknesses compared to the FSC US standard. See our detailed comments in the attached form.
   f. SBP’s proposed approach to accreditation has significant weaknesses: it is unclear how certifying bodies will be accredited to assess the requirements of the SBP standards. It seems to rely on the FSC and PEFC verification systems but these have a limited scope: addressing compliance with FSC or PEFC standards only. See our detailed comments in the sections below.
   g. We have not reviewed in detail Standard 5 yet. However we do note that it does not contain a target for greenhouse gas reductions compared to the fossil fuel the pellets are to replace. This could be important in particular where national rules do not set such targets or are
considered by stakeholders as insufficient. Moreover, we miss in the methodology the consideration of the “carbon debt” that arises when biomass is used that has grown over a number of years and/or when there is no guarantee of complete restoration of the biomass harvested.

h. In conclusion, we are concerned that your scheme seems to be motivated by the wish to maximise the supply of pellets at the short term rather than ensure sustainable sourcing. We call upon you to review this and choose an approach that, while initially this may lead to less biomass use, on the long term can ensure sustainable sourcing and therewith lasting public support. This means in particular to outreach to the primary biomass producers encouraging and assisting them to move to credible certification.

19:

1. The two main elements of sustainable forest/agriculture standards are:
   a. The Principles, Criteria and Indicators. In the BAF this would be standard #1: The Sustainable Feedstock Standard.
   b. Compliance procedure to secure that the P,C & I are met: Auditing, verification, accreditation etc. In the BAF this is standard #2 and #3.
   c. Both are equally important. The ambition level of a set of criteria depends on the ambition level on verification and compliance. The draft SBP standard is fundamentally weak on the latter, because it allows for the pellet mill to be the Level of Certification and not the Forest Owner.
   d. This is a fundamental shortcoming that undermines the credibility of this standard.
2. Greenpeace cannot take this standard seriously, as long as it does not certify forest on the level of the forest.
3. We could assess the Sustainable Feedstock Standard first, but we will not do that yet, because it is not relevant to do so as long as the compliance procedure is weak. Even good criteria become a paper reality when an independent, accredited auditor does not verify compliance to the criteria on the level of the forest owner, on the ground, which is normal practice in other SFM standards, like FSC. Therefore, the BAF must certify forest owners and not allow for only the pellet mill to be certified, to become a credible standard for us. After that, it makes sense for us to give feedback on the criteria in the Sustainable Feedstock Standard itself.
4. The argument that this is not possible because the pellet mill is only a small buyer of wood is not convincing. Since the start of FSC, this has been the argument used by many buyers of forest products to avoid certification. Paper mills and timber companies have said the same. A lot of buyers of forest products are only buying a relatively small percentage of the wood coming from a certain forest owner. This is not a new argument. If pellet companies buy 10% of the value of a harvest, this is not a small amount. Pellet mills that depend on whole trees cannot claim that they are only a small buyer of wood.
5. On top of that, the market for wood pellets is entirely driven by government policies. EU Governments adopted the Renewable Energy Directive, which includes a renewable energy target of 20% in 2020. To realize that target, Member States introduced subsidies for renewable energy, or renewable energy market obligations. One of the main goals of the renewable energy target is reduction of CO2 emissions. So tax payers and consumers pay extra for sustainable energy that reduces CO2 emissions as the result of installed government policies. It is in this context that the need for sustainability criteria for biomass should be regarded. Energy companies can import and use wood pellets, but to get subsidies or certificates for that, paid by tax payers, these wood pellets need to be truly sustainable. In that light, the industry-only SBP standard fails to get even
close to becoming an acceptable and credible norm for executing this public policy. Besides that, the fact that the market is based on public policy and is entirely subsidy-driven also means that certification on the forest level cannot really be a financial problem for market parties.

6. Finally, on the level of criteria, measurable criteria on carbon debt, IWUC and ILUC are still missing and should be added. A lot of science shows that these effects can negate the possible climate benefits of using wood for bioenergy so criteria must be defined to prevent this and safeguard that bioenergy leads to GHG benefits.

24:
1. Standard 3 currently only allows for FSC and PEFC accredited service providers to perform SBP certification. We proposed that professional services firms who are experienced in the provision of ISAE 3000 assurance over UK Renewables Obligation Order reporting should also be considered as potential SBP certification bodies. The rationale for such a proposal is that a number of professional services firms are already experienced and active in the forestry biomass space, as a result of the UK government’s requirements that Renewables Obligation Order reporting by electricity generators should be assured to the requirements of ISAE (International Standard for Assurance Engagements) 3000. As the requirements of the SBP and the Renewables Obligation Order are closely aligned, those firms who are experienced in the provision of assurance over Renewables Obligation Order reporting should be sufficiently experienced and qualified to perform SBP certification audits.

2. We also propose a number of amendments across the Standards where we feel more clarity or formality of the SBP’s requirements could be provided, in order reduce the risk of different applicants or certification bodies interpreting the Standards in different ways, introducing a level of inconsistency to the Framework.

3. One of the listed goals of the SBP is to stimulate the uptake of FSC or PEFC certified forests. Having considered the standards provided as part of the consultation, it is not currently clear what incentives there are for biomass plants to obtain FSC or PEFC CoC certification and purchase FSC or PEFC certified material. Instead, it seems that SBP may instead be competition to the FSC and PEFC standards, which would aid in further segregating the market and the means by which a company can display the sustainability credentials of its biomass products.

25:
1. The vague and loose definition of criteria and indicators of the SFS fail to make the SBP a credible certification scheme that would ensure the consumers that pellets used do not contribute to environmental and climate damage.

2. The Biomass Assurance Framework seems lack an honest assessment of the most problematic issues related to the sustainability of pellet manufacturing, such as control mechanisms to ensure that timber wood is not used for energy only or to ensure that only low climate impact biomass feedstocks are used.

3. The several exemptions of the BAF concerning materials certified by other schemes and non-primary wood resources, the fact that mixing of non SBP certified materials in the pellets is allowed and that energy generators can also use non-certified materials mixed with certified make the scheme hard to understand and easily confusing.
4. The documents under consultation do also not provide any explanation on what is actually the outcome of the SBP certificate, what are the labels associated, how can they be used by energy utilities and what would the possible labels actually guarantee. The scheme doesn’t seem to provide a solid basis and clear guidance for the third-party verification of the pellet mills.

5. In-depth comments [later in this document] illuminate these general concerns.

6. The introduction of the SBP system indicates a will and a commitment to ensure the sustainability in biomass production, which we find very commendable. We are happy to see that the system makes it possible to base a sourcing of sustainable biomass on well-established systems with wide NGO support, such as the FSC. Added to that, we are happy to see that the SBP system will be fairly transparent as stakeholders will be given insight in summary audit reports.

7. However with that being said, we do have some great concerns with regards to the suggested design of the system.
### STANDARD #1: Sustainable Feedstock Standard

<table>
<thead>
<tr>
<th>General comments</th>
<th>15: As noted under our General Comments, several of these criteria and indicators may present challenges for the pellet producers, yet SFI Fiber Sourcing would support such objectives.</th>
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</thead>
<tbody>
<tr>
<td></td>
<td>12: In standard #1, remove web links in the guidance cells as web links can make the document dated very quickly and if the web links are considered necessary, then government web links ought to be present as well; which if you place all relevant government web links from all countries shipping pellets. Similarly guidance ought to be in the form of statements and not questions, it is relatively easy to convert the existing questions to statements.</td>
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<td>13: It might be worth considering adding a &quot;Terms and Definitions&quot; section to this standard.</td>
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<td></td>
<td>20: Neither standard 1 nor 5 make an effort to minimize the ‘carbon debt’ created when wood is burned directly for energy.</td>
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<tr>
<td>1.1</td>
<td>17:</td>
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<td>1. The RA tiers off of the facility sourcing mapping. That is, the RA will only be as useful in mitigating risks as are the geospatial data sets supporting the RA. How is the facility sourcing are defined? and is the facilities' defined sourcing area audited to ensure that the area includes all forest parcels in a feasible transportation distance without harvesting prohibitions? Such a mapping exercise needs to be more than just a radial 50 - 75 miles around the facility as sourcing regions tend to be more amoebic in appearance than circular due to the underlying transportation network, forest product markets, land uses, etc. Are there geospatial tools available to help estimate transportation networks and biomass price within the supposed sourcing area? Could a link to such a tool be linked to under the guidance?</td>
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<td></td>
<td>2. Per the SBP COC standard, does the origin of material from outside the SBE need to be identified? What if it is determined that the origin is outside the SBE?</td>
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</table>
1. Need clear references to the key pieces of regulation such as the UK Timber Standard (TS) and the Dutch agreement on NTA8080.
2. References to CPET need to be deleted. CPET is not regulation-the TS is. Also the TS has changed some of the criteria from CPET and these changes need to be addressed in the Standard.
3. The SBE needs to have a standard form in response and in summary. Need a standard list of possible answers and a form of necessary data.

1.2

17: The guidance could offer some examples of transport documentation (e.g. Georgia’s load tracking system). Geo-referenced Timber tickets that help track material.
2. It would be ideal if a load tracking system using GIS or some other method could be related to the mapped supply area. Couldn’t the facility work with loggers in the area to implement a scanning system to generate load tickets that are scanned at the facility gate to determine whether the load was generated within the supply area and specifically where it was generated within the supply area? That would be the most effective way to determine if the load was coming from a High Conservation value area...and also to then look back and determine future land uses (e.g. rates of cover type and land use conversion). Such a record keeping approach would also make 1.1.3 and 1.5.1 simple to comply with.

18: We find that the lack of normative guidance compromises the credibility of the standard.

16: The number of categories (3) is inadequate for monitoring the application of the standard.

25: Means of Verification should be normative to ensure consistent application of requirements, particularly since third parties, such as suppliers and harvesting contractors – unaccustomed to applying standards - are permitted to apply these requirements.

1.3

18: The use of the word ‘third parties’ is confusing as it is usually used to describe an independent verification body. It would therefore be more appropriate to refer to suppliers and contractors as ‘second party’.

1.4

5: Line 33: change the wording to “will be a low-risk for non-compliance...”

8: This is not very clear –Recommend re-titling 1.4 Evidence base used for Risk Assessment and Supplier Validation Programme and then describing the differences in evidence that may be used.
**18:** We find that the lack of field visits compromizes the credibility of the system, as the only credible way to check if a company is using – for example – child labour is to visit the production sites. Quoting employment practices as objective evidence against the use of child labour is simply not credible.

12: To what extent does this criterion on compliance/verification with local and national laws go – Ontario has posted maximum speed limits and many people are caught breaking the posted speed limit aka break the law – is there an intent/desire to narrow the focus to only biomass feedstock?

25: Desk-based evidence is insufficient for determining risk for many of the indicators (e.g., indicators under Criterion 2.1, 2.2, 2.4, 2.5, 2.6, etc.). The Risk Assessment must include appropriate sampling at the field level for all indicators, or risk will be unacceptably high – compromising the credibility of the overall standard.

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| 1.5 | 8: “Smaller operating units will not be expected to provide the same level of documentation or procedures that are normally used for larger or more intensively managed companies” – Why not? Size defined how? Level of detail defined how? | 14: One of the possibilities for primary controlled wood is a supply “from forest holdings within the scope of a Supply Base Evaluation in which all indicators of the criteria specified in Table 1 of the Sustainable Feedstock Standard are rated as low risk”. Is there any difference between this condition and the second option allowed to consider primary feedstock as SBP compliant (“Supplied from forest holdings within the

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18: Enough evidence should always be provided to determine that the risk is low. Mitigation actions must be implemented if sufficient evidence of low risk cannot be provided. This must apply no matter the scale or intensity of the SBE. Added to that, we find the lack of clear definitions of scale, intensity and risk problematic, as it leaves the issue totally free for interpretation.

24: 
   1. In lines 42-45, the standard states that “smaller operating units will not be expected to provide the same level of documentation or procedures that are normally used for larger or more intensively managed companies”.
      a. Though we appreciate the rationale for such a consideration, in practice the assessment of the size of organisation and level of documentation required would currently be left to the auditor’s interpretation, thereby exposing the standard (and associated certification) to inconsistencies.
      b. We propose that this consideration should be removed from the standard, or that further clarification should be provided regarding when an organisation can be defined as a “smaller operating unit”, and what minimum level of documentary evidence would be acceptable for such an organisation.


scope of an SBP Supply Base Evaluation in which all indicators are rated as low risk.”). In other words: should wood sourced from holding with low risk SBE for all indicators is considered as SBP compliant primary wood, or just as SBE primary controlled wood?

2. Can any secondary feedstock be considered as from controlled source? The standard only refers to compliant secondary source, not to controlled secondary source.

1: Reference is made to “table 1.” But table 1 is not in a table format but more a list of bullet points. This creates a little bit of confusion. SFI Fiber Sourcing should be recognized as an acceptable controlled feedstock system. As an existing, proven system, it is an inconsistency in the application of SBP’s stated mission to exclude SFI fiber sourcing from being an acceptable methodology.

8: Tertiary woody feedstock will need to meet the Timber Standard to meet UK requirements.

3:

1. Your decision to treat feedstock coming from forests certified to either PEFC (primarily SFI and ATV in the US) or FSC as SBP-compliant is reasonable and welcome. These standards provide a high level of sustainability assurance.

2. We believe the SBE for Controlled Primary Feedstock, given the foundation provided by the robust system of laws and regulations in the US addressing biodiversity, clean water, worker protection and indigenous peoples should, as a default, reach a finding of “Low Risk” for all Principles, Criteria and Indicators of the SBP Sustainable Feedstock Standard for feedstock produced under a Controlled Feedstock System like the SFI Fiber Sourcing Standard. SFI Fiber Sourcing requires the use of Best Management Practices for Water Quality (BMPs), requires the pursuit of BMP improvement, requires regional assessments such as growth/drain analysis, encourages the use of trained loggers and requires the provision of information to landowners on forests of exceptional conservation value, threatened and endangered species, BMPs and other relevant topics. Speaking from experience, the SFI Fiber Sourcing program has made a real difference on the ground.

3. As we understand it Secondary Feedstock supplied under FSC controlled wood or PEFC controlled sources is considered SBP compliant but Secondary Feedstock supplied under SFI Fiber Sourcing is not. We encourage you to reconsider the exclusion of SFI Fiber sourcing for all the reasons included in (2) above. We also believe the significant existing uptake of SFI Fiber Sourcing is an indication of its relevance to the wood production systems found in the US.

18: Pre-consumer Tertiary feedstock should be included in SBP. The product is included by EUTR and the additional requirements for including it into the controlled feedstock system would be limited.

23: Wrong reference to Table 1 (line 49), all the Principles and Criteria must be valid for compliant Primary feedstock. We suggest, for clarity, to call the pages 8 and following “Table 2” and change references in the text accordingly.

25:
1. 1.6 states that Controlled Primary Feedstock (that is not covered by an SBP Approved Controlled Feedback System) only needs to meet the specified criteria in Table 1 (a subset of the full standard).
   a. This limited assessment of Controlled Primary Feedstock is seriously insufficient – especially in light of the fact that most of the volume in the market will be coming from feedstocks not currently covered by an SBP Approved Controlled Feedback System for the foreseeable future.
   b. This limitation of the analysis is also referenced in the “Key Concepts in the Biomass Assurance Framework” document (pg. 6 section 2.4).
   c. This same document provides a definition of Controlled Sources (pg. 8 Section 2.5) that includes, but is not limited to, “Primary Feedstock that is supplied from forest holdings within the scope of the SBE in which all indicators of the criteria specified in Table 1 are rated as “low risk”.”
   d. This limitation implies that feedstocks only need to be subject to the much abbreviated list of criteria in Table 1.
   e. So long as all of those limited criteria result in a “low risk” decision, the BP need not proceed with the full analysis of all of the criteria and indicators.
2. This issue is one of the most serious deficiencies of this standard – rendering the entire process to an extremely limited desk audit of a handful of sustainability criteria – in fact, only two out of the total eleven criteria under “Sustainability”, none whatsoever under “Systems to ensure continued compliance” (with the exception of feedstock already certified by an SBP Approved Controlled Feedback System – which, as stated above, will be a limited amount of volume in the market).

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<thead>
<tr>
<th>Principles &amp; Criteria</th>
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</thead>
<tbody>
<tr>
<td><strong>Principle 1. Biomass Feedstock is legally sourced</strong></td>
<td></td>
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<tr>
<td><strong>Criterion #</strong></td>
<td><strong>Comments and justification for proposed amendments</strong></td>
</tr>
<tr>
<td>General comments</td>
<td></td>
</tr>
<tr>
<td>6: All indicators in Principle 1 are covered by valid PEFC &amp; FSC CoC certificates and should not be subject to additional verification.</td>
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<tr>
<td><strong>1.1</strong></td>
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<tr>
<td>5: 1.1.3 – this is new. Is there a reason that the mix of primary, secondary and tertiary feedstock is required?</td>
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<tr>
<td>1: 1.1 through 1.6 should be recognized as being low risk within the context of the U.S. Legal framework and provision of the forms of evidence that certified sourcing standards provide (such as SFI Fiber Sourcing).</td>
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<tr>
<td>4: The standard should be clear about what the “appropriate scale” of the supply base scope is. We recommend, per our general comments above, that the appropriate scale should be larger rather than smaller for a number of environmental and economic reasons.</td>
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</tbody>
</table>
7: 1.1.2 – the tracing of sawmill mill process residuals, to track /source will be difficult; however, the catchment for that sawmill can be identified and risks assessed, identified, and mitigated. The pellet producer’s SBE should define the area of procurement to extend and include the area also sourced by sawmills that are suppliers to a pellet producer. An audit of sawmill suppliers could verify compliance without tracking sawdust from pellet producer -> sawmill -> tract of timber the logs were harvested. Verifying origin of wood fibre, sourced directly from forest, to pellet producer is not difficult and is required by law. This law also applies to the sawmills that buy logs and deliver their sawdust to pellet producers.

8:

1. 1.1.1. Does the Supply Base mean the area that is evaluated or the complete area from which material is sourced? This is unclear especially when the guidance in 1.1.1. indicates from feedstock can be used from outside the SBE. Presumably this should refer to outside the ‘area of the SB evaluation’. It is also not clear what the maps should define – is it intended to be a land based evaluation (including HCV areas; protected areas; agri/forestry designated land; peatland areas; wetland areas, water tables) or logistics maps with road/rail distances to ports etc or land ownership/management maps?.

2. Criterion 1.1.2. The indicator should read ‘Feedstock can be traced back to its source. For secondary material we are unlikely to get all sources identified- mainly general areas?

3. Criterion 1.1.3. This has to apply to ALL feedstock, not just all of that from the SBE.

4. Criterion 1.1.3. What does a ‘description of the inputs’ mean? Need to define the data required and link to Standards 4 and 5 where data requirements are delineated.

5. Suggest data required include metrics that are gathered in other certification systems (by area, or volume used, or both):
   a. Tenure type: Privately owned/Public/Community concession
   b. Whether the forest is Boreal/Temperate/Tropical
   c. Whether forest is Plantation/Managed Natural/Natural
   d. Certified proportion (by type)
   e. Feedstock type: sawmill residue/in-forest chip/roundwood

3: 1.1.2 – The ability to trace should be limited to the county of origin.

18: There needs to be procedures to avoid mixing at plants producing both certified and uncertified pellets.

23: 1.1.1: the Certificate Holder shall define its management objectives, not only the scope.

1.2

5: 1.2.1 – can we please state that in regions where there is a strong system of laws for land rights and a well enforced system of policies that less of a burden will be placed for finding tenure for individual land holdings?

1: Criteria 1.3 through 1.7 correspond with SFI Objective 14 which applies to SFI-FS and requires legal and regulatory compliance.
7: Legality Criterion can be met with ease – no further comments.

3: 1.2.1 – All feedstock sourced in the US should be considered legal.

18: In many cases, a forest owner would have no problems demonstrating legal documents proving his ownership of the forest, despite the fact that indigenous peoples may have a traditional claim to the land. Such a situation will not be uncovered merely by looking at documents demonstrating ownership. It would require field visits and stakeholder consultation by an independent expert on the issue.

| 1.3 | 5: 1.3.1 – it is not clear where the “DECC, Timber Standard...” line comes from. May be just a formatting issue. |
|     | 4: 1.3.1 reword as “The pellet mill does not source from illegal harvesting operations or operations noncompliant with EUTR legality requirements.” |
|     | 7: Non issue |
|     | 3: Same as 1.2.1. |
|     | 18: The effectiveness of the means of verification are questionable in countries with high corruption as the verification is very much paper based. We recommend additional means of verification to be required for areas with high perception of risk. |
|     | 12: Part of Criterion 1.3.1 is redundant since 1.2.1 show legality of ownership and landuse. If kept, replace illegal logging terminology to harvesting compliance and monitoring system. Or drop it completely and just keep the EUTR requirements. |
|     | 13: |
|     | 1. Additional relevant sources of information may include: |
|     | b. Transparency International Corruption Perceptions Index (http://www.transparency.org/research/cpi/overview) |

| 1.4 | 5: |
|     | 1. 1.4.1 – to state that no issues of legal non-compliance are raised by...other interested parties” can lead to a lot of risk as this is a very black and white term and “interested parties” are not defined. |
|     | 2. 1.4.2 – see comment for 1.4.1 |
4: 1.4.2 reword as “The pellet mill operator implements anti-corruption measures.”

7: Non issue

3: Same as 1.2.1.

18: Same as for 1.3.

23: 1.4.1: We suggest including an additional requirement to avoid conflicts between standards’ requirements and national laws. i.e.: Situations in which compliance with laws or regulations conflicts with compliance with FSC Principles, Criteria or Indicators are documented and referred to the CB. Such an addition might solve disputes and practical issues in the implementation of the standard.

1.5

4: 1.5.1 reword as “The pellet mill operator will safeguard against sourcing from harvesting operations that do not pay for harvest rights and timber including duties, relevant royalties and taxes related to timber harvest in a complete and timely fashion.”

7: Non issue

3: Same as 1.2.1.

13: 1.5.1 - Records of tax filings may also serve as a meaningful means of verification.

1.6

4: 1.6.1 reword as “The pellet mill operator will safeguard against sourcing from operations not in compliance with the requirements of CITES.”

7: Non issue

18: SBP should exclude the use of CITES species regardless of national regulation.

24:

1. 1.6.1 States “where relevant the operation possesses permits for harvest and trade in any CITES species” and that the organisation should “put in place appropriate mechanisms to minimise the impact of the use of any CITES species on those species”.

   a. Though legal, allowing the use of CITES-listed species in pellet production for energy generation may expose the SBP to negative media or NGO attention, potentially reducing its credibility as a certification scheme.
b. As such, we propose that criterion 1.6 should be amended such that the use of CITES listed species is not allowed under the standard.

### 1.7

4. 1.7.1 reword as “The pellet mill operator will safeguard against sourcing from operations that violate traditional or civil rights.”

7: Non issue

3: Same as 1.2.1.

18: This is very vague, how should rights be identified?

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**Principle 2. Biomass Feedstock is sustainably sourced**

<table>
<thead>
<tr>
<th><strong>Criterion #</strong></th>
<th><strong>Comments and justification for proposed amendments</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>General comments</strong></td>
<td>17: Perhaps a definition of “biomass feedstock that is sustainably sourced” would be useful at the outset. 1 paragraph would most likely be sufficient.</td>
</tr>
<tr>
<td></td>
<td>6: Indicators 2.1.1-2.1.4, 2.7 – 2.9 and 2.11 are covered by valid PEFC &amp; FSC CoC certificates and should not be subject to additional verification</td>
</tr>
<tr>
<td></td>
<td>21: The SBP Principle 2 (sustainably sourced) and Criteria provide no assurance of protection of forested wetlands.</td>
</tr>
<tr>
<td><strong>2.1</strong></td>
<td>5:</td>
</tr>
<tr>
<td></td>
<td>1. 2.1.1 - The guidance here is not formatted as guidance but seems to just list the attributes that could be contained by HCVs. Suggest rewording</td>
</tr>
<tr>
<td></td>
<td>2. 2.1.2 – Suggest deleting “A precautionary approach is adopted as it is not clear what this is or how it would be proven”</td>
</tr>
<tr>
<td></td>
<td>3. 2.1.4 – this is completely unacceptable. Is on a tract basis or a regional basis? If the former then we have very little way of controlling the actions of the landowner and how long do they have to keep it semi natural? For the latter: we are not the only ones driving management.</td>
</tr>
<tr>
<td></td>
<td>14: The concept of HCV is commonly used in forest certification. It is however extremely difficult to use at the level of a region, because there is a need to map the HCV before we can tell anything about the threats, impacts, etc., on those HCV. If a map of HCV (which is not to be confused with a map of protected areas) is not readily available, producing it is a long and expensive process.</td>
</tr>
</tbody>
</table>
Other approaches are possible to assess impact on biodiversity, ecosystems, endangered species, soil, water, traditional communities, cultural features etc...

1:
1. Criterion 2.1 corresponds to SFI Objective 8.2 which applies to SFI-FS: a program to address forests with Exceptional Conservation Value in harvests of purchased stumpage.
2. “High Conservation Value Forests” is an FSC centric term and FSC is not widely used in the US. It would be more appropriate to use the language from the EU Renewable Energy Directive (RED) to avoid aligning the SBP standard with only one specific scheme; “land with high biodiversity value”.
4. The requirement to adopt a precautionary approach should be dropped. This approach presumes that uncertainty should be managed as if it were harm. The range of natural values in forests is very broad and uncertainty is common. The precautionary approach would lead to widespread to hands-off oriented approach to management. A better approach is an adaptive management approach which leads to conservative actions in conjunction with monitoring, evaluation, and revision of actions. Such an approach supports advancing scientific inquiry in areas of uncertainty.
5. In 2.1.2, “Semi-natural forest” should be changed to “primary forest” in keeping with the RED terminology rather than aligning with a specific scheme. The guidance should include the RED description of primary forest, “a forest where there is no clearly visible indication of human activity and the ecological values are not significantly disturbed.” The FSC term is subject to broad interpretation and is not recognized broadly.

4:
1. 2.1.2 says “The potential threat of forest management to High Conservation Value is minimised. A precautionary approach is adopted.” A more appropriate phrasing would be “The recovery of bioenergy feedstocks do not contribute to impacts on areas of High Conservation Value.”
2. 2.1.3 says “Safeguards are implemented to protect rare, threatened and endangered species and their habitats.” This wording is better than 2.1.2, but it is unclear who is meant to implement the safeguards. It would be clear that the pellet mill implements the safeguards to make sure to source from land that is not putting these species types at risk. Reword as “The pellet mill operator implements safeguards to protect rare, threatened and endangered species and their habitats.”
3. Again, for 2.1.4, it should be made clear that bioenergy feedstock will not be sourced from land that was converted to plantations after January 2008. Reword as “Bioenergy feedstock are not sourced from land that was converted to plantations after January 2008.”
1. FSC uses this term “HCV’s” and the FSC standard requires that they are identified and that the producers procurement system should avoid these areas. The use of the word “maintained” (in this criteria) is a little troubling since the pellet producer does not have possession or rights over the management of these areas. All the pellet producer can do is “avoid” and have “up stream” suppliers do the same.

2. 2.11 – FSC also precludes the use of GMO’s

3. 2.1.3 – The pellet producers do not control the land/forests; therefore, their actions are limited to the types of “safeguards” they can employ and cannot “implement” actual practises on the land but for harvest operation. Pellet producers can avoid direct impacts through procurement procedures related to harvest and a reliance of the ESA laws that are in effect for all parties (landowner, logger, supplier, pellet producer, etc.)

9:

1. 2.1.2
   a. Many small landowners do not currently have well documented management plans. The complexity of these plans will vary based on the resources available to the land owner and the size of their land holdings.
   b. The standard requires that impacts that originate in the area of operation are to be considered as well as downstream impacts outside the area of operation. It is possible that downstream impacts could also be located outside of the defined Supply Base. It is our assumption that we should use our best judgement in determining where to look for external impacts.
   c. Related to the prior comment, we ship product to the port by barge and the shipping distance is beyond the area of our Supply Base. This same scenario could occur for a producer who ships by rail to a port facility. Are all areas within the supply chain which are located between our facility and the port to be considered for downstream impacts?
   d. The standard references mitigation measures implemented in the field. We assume the Biomass Producer is alone responsible for determining that the mitigation measures chosen are appropriate.

2. 2.1.4 We are following FSC’s definition of (the attributes of) a semi-natural forest which we assume to be acceptable.

3. 2.1.4 It will be difficult to verify/prove that tracts owned by small land owners have not changed use since 2008.

17:

1. 2.1.1
   a. Are both the FSC High Conservation Value (HCV) forests and SFI Forests with Exceptional Conservation Value (FECV) definitions to be considered? The guidance is organized to address the major components of an HCV assessment.
   b. “High Conservation Value Forests shall be identified and mapped.” Ideally this would occur at the outset of mapping a supply area, or a potential supply area, so that risks to HCV can be mitigated early on (see comment in 1.1.1 above). This could potentially be done through an online tool, perhaps the same tool as discussed above for 1.1.1 that would be used to map the economically accurate supply area.
c. Is this a direct reference to FSC’s HCV assessment process or a different concept that just borrows the language? If a direct reference this would be a better link that the www.HCVnetwork.org link: This weblink does not include FSC US HCVF. This is a better link: http://us.fsc.org/download.fsc-us-hcvf-assessment-framework.97.pdf If SFI’s Forests of Exceptional Conservation Values are to be included then an appropriate link to their process should be included such as: http://www.sfiprogram.org/files/pdf/draft-sfi-2015-2019-standard-section-6/

d. A key distinction between FSC and SFI is that FSC HCV may include-- G1-G3, N1-N3, and S1-S3, whereas SFI explicitly identifies only G1 and G2. This may be significant according to how state natural heritage programs code species. The SBP used the following language: “globally, regionally or nationally significant [emphasis added]: concentrations of biodiversity values (e.g. endemism, endangered species, refugia); and/or large landscape level forests, contained within, or containing the management unit, where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance”
   ii. I am not that familiar with the tool but https://surveyor.natureserve.org/ may be useful in identifying rare, threatened and endangered species. It queries the natureserve database which is an amalgamation of state natural heritage data.

e. Under guidance for 2.1.1 it says “forest areas that are in rare, threatened, or endangered ecosystems” but it does not address the scale or classification of these RTEs. Is it state heritage data, G1, G2, G3 or something else.

2. 2.1.2
   a. “A precautionary approach is adopted.” This suggests that if there is the potential for an Element Occurrence then mitigation measures should be implemented. Said another way this could be said, “if you think a rare, threatened, or endangered species is there, don't harvest timber.”

   b. The HCVnetwork.org site is less relevant for the US.

3. 2.1.3
   a. Examples?

4. 2.1.4
   a. “There is no conversion of (semi)-natural forest to plantations after January 2008 Means of verification: Historical maps and enquiries with stakeholders.”

   b. A definition of “(semi)-natural forest” is needed. What is the intent.

   c. All this implies is that you can’t source from areas that were planted as plantations after January 2008. This does little to prevent conversions to pine plantations after harvest of upland hardwood and long-leaf pine.
3.  
   1. 2.1.1 – The definition of High Conservation Value Forests should not be prescriptive; rather Biomass Producers should be encouraged to identify such forests based on available information relevant to their Supply Base.
   2. 2.1.3 – In the US the Endangered Species Act applies to all activities, including forestry. Compliance with ESA should be deemed to provide substantial compliance with this criterion.
   3. 2.1.4 – The typical planted pine stand in the southern US is commonly understood to fall within the definition of semi-natural forest. The SBP Standard should be clear that there is no restriction on the establishment of such stands.

18: A definition of rare, threatened and endangered species has to be provided. It is unclear what is understood by HCV forest. It is hard to see how on-ground monitoring can be avoided regarding HCV.

2:  
   1. 2.1.4: This is an attempt to write lands protections into a feedstock standard for renewable biomass. It is inconsistent to recognize the beneficial values of woody biomass and then dictate which forests can participate. Currently 92% of our nation’s forestland is natural. In the Southeastern United States, on private lands, 88% of forestland is natural. Therefore, if this criterion were applied, 92% of America’s forestland would not meet the criteria. This creates a disincentive for private forest landowners to continue managing forests.
   2. In order to promote the continuation of sustainably managed forest on private lands we need to encourage markets for these landowners. This criterion would impact current facilities and the siting of new facilities and exclude the majority of America’s forestland.

12:  
   1. Suggest that in the guidance section, only the 4 bullets be kept or I can supply a long list of Canadian websites relevant to this criterion which ought to be added.
   2. For 2.1.4 qualify that replanting a forest area does make the planted area a plantation, in Ontario part of the legally required forest management plans for crown lands are silvicultural ground rules of which one classification is labelled ‘intensive silviculture’ which in Ontario does not make the forest area a plantation. It will be challenging how to reconcile terminology used in a particular manner in one nation and in a difference manner in another nation.

16: Why the prohibition of GM trees? FSC already does this, so this is redundant when used with FSC. If a forester wishes to use GM, then he has the choice to use PEFC as the base standard. What business is it of SBP whether the trees are GM? This is nothing to do with sustainability but a pure prejudice.

13:
1. 2.1.1 - Additional relevant sources of information may include: Global Forest Registry (http://www.globalforestregistry.org/)
2. 2.1.4 - Additional relevant sources of information may include: Forest and Agriculture Organization (FAO) (http://www.fao.org/forestry/30515/en/)

21:
1. Criteria 2.1 (High Conservation Values (HCV)) does not include provisions that would ensure that forested wetlands are not harvested or even clear cut for fuel pellet production.
2. Forested wetlands could be included in high conservation value forests or high biodiversity forests, but there is no requirement to include them [meaning it would be good to include them].

22:
1. 2.1.1: This indicator need to be more clear. Many countries, like Latvia, are not on any HCVF-list. However some Latvian stakeholders may consider some forest areas as high conservation value forests. When does a forest area get the status of being a (strict) HCVF? Many forests with high conservation values are protected in nature reserves etc, but, without the status of being a HCVF.
2. 2.1.3: Does this indicator refer to all RTE species? Even those which are not forest- or forest ecosystem species?
3. 2.1.4: “A Plantation is a forest area lacking most of the principal characteristics and key elements of native Ecosystems, which result from the human activities of either planting or intensive silvicultural treatments.”
   a. Following this guidance more or less all forests in Europe are Plantation forests!!
   b. Furthermore, what is the definition of (semi)-natural forest? According to UN-FAO: “Planted forests are generally defined according to the extent of human intervention in the forest’s establishment and/or management, which depends, to a large extent, on the purpose of growing the forest. In many instances, because there is an extensive range of silvicultural practices applied in varying levels of forest management to achieve different objectives, the difference between a semi-natural forest and planted forests is essentially arbitrary – it is in the eye of the classifier (FAO, 2000a). There is a need to recognize semi-natural forests which are neither strictly natural forests with minimal management nor planted forests with intensive management, but which provide critical wood and non-wood forest product supplies and valuable social, cultural, environmental and economic values. Semi-natural forests may be selectively harvested for wood and non-wood forest products, receive enrichment planting and/or seeding or have silvicultural treatments to enhance growth and yield. A wider planted forest classification can potentially include indigenous species, particularly in Europe and North America that have been reported as natural forests in FAO Global Forest Resources Assessments in the past, including the Global Forest Resources Assessment 2000”.

20: 2.1.2 states that “The potential threat of forest management to High Conservation Values is minimised. A precautionary approach is adopted.” The standard does not require any kind of definition of HCV, which would be wise, as it is one of the most debated concepts in FSC certification (for example). This gives the biomass producers the liberty to say that all HCVs have been covered by national protected areas, for example, which is
rarely the case. The indicator also does not require producers to conserve HCV but allows their destruction if some evidence can be produced showing that the biomass producers tried to avoid it. In the common sourcing region of the energy utilities involved in the SBP, clear cutting of natural wetland forests is an obviously environmentally destructive practice but based on our interpretation of the SFS, it would not bring any relief to this problem. An exact definition of HCVFs is essential to any credible certification.

23:

**CW Alignment (table 1 comparable to FSC – CW)**

1. 2.1.1: SBP states that damage to HCV shall be minimised. This should be changed to guarantee the alignment between FSC CW and Table 1. i.e. “Forest management activities in the FMU shall not threaten high conservation values”. 2.1.2: Provide a report and of assessment of HCV and a consultation on HCV to guarantee the alignment between FSC CW and Table 1. 2.1.4: The conversion rule is included in HCV criterion only; this is misleading as it might mean that this criterion applies only to HCVF. Conversion rule should specify the non – conversion of HCV, but it should be a general requirement not valid only for HCV.

2. 2.1.4: Missing requirements to avoid conversion of forest areas to non – forest (only plantations are covered). This should be changed to guarantee the alignment between FSC CW and Table 1.

3. 2.1.1: SBP states that damage to HCV shall be minimised. This should be changed to guarantee the alignment between FSC CW and Table 1. i.e.: “Forest management activities in the FMU shall not threaten high conservation values”. 2.1.2: Provide a report and of assessment of HCV and a consultation on HCV to guarantee the alignment between FSC CW and Table 1. 2.1.4: The conversion rule is included in HCV criterion; this is misleading as it might mean that this criterion applies only to HCVF. Conversion rule should specify the non – conversion of HCV, but it should be a general requirement not valid only for HCV.

4. 2.1.4: Missing requirements to avoid conversion of forest areas to non – forest (only plantations are covered). This should be changed to guarantee the alignment between FSC CW and Table 1.

**Comment on Principles and Criteria**

5. 2.1.1: Add a mandatory summary and report on HCV. This might be covered in the guidance, but it should be in the requirements. 2.1.1: Add specific consultation requirements for HCV. This might be covered in the guidance, but it should be in the requirements. 2.1.2: Mitigation of damage on HCV is not enough. (i.e. maintenance and/or enhancement of all high conservation values present in all identified HCVF areas, including the precautions required to avoid risks or impacts to such values (see Principle 7).

6. 2.1.2:
   a. Incentivize coordinated management beyond FMU to preserve HCV.
   b. Provide timeline (annual?) for monitoring and reporting of HCV
   c. Provide update on practices when risks are high or impacts occur. Adjust management depending on the impacts occurred and on the risk.

7. 2.1.4:
   a. Conversion rule shall be applicable beyond HCV, add a new criterion specific for conversion (now it is in the HCV criterion, it might
b. Add a specific requirement about “non – conversion of HCV”, it seems to be implied as it is within the HCV criterion, but it is not specific.

c. In line with the FSC US standard, add a specific requirement for non-conversion of “rare or threatened non-forest habitats or ecosystems”.

d. Add incentives to focus on locally adapted and native species.

e. Add management of converted areas to mitigate damages. This aspect is important for areas converted before 2008. 2.1.4: Add requirements to implement a plan to restore the plantation to conditions characteristic of natural forest for areas converted after 1994

f. Missing requirements to avoid conversion of forest areas to non – forest (only plantations are covered). This might be relevant for roads or processing facilities constructions or when part of the forest is converted to other land use types (grazing, agriculture).


24:

1. 2.1.1 States “interviews” as a means of verification for this criterion. Though interviews are a useful means of investigation to support verification activities (such as the other listed means of verification – maps and internet research) they are unlikely to be sufficient for verification when not supported by documented and / or independent evidence sources.

   a. Consequently, we would welcome an amendment to clarify that interviews should not be used in isolation as a means of verification.

2. The requirement of 2.1.4 is that “there is no conversion of (semi)-natural forest to plantations after 2008”. As a number of different definitions exist for the term “semi natural forest”, we propose that the standard should state the SBP’s definition of the term in order to avoid any inconsistencies in interpretation.

2.2

5:

1. 2.2.6 – suggest removing this indicator. Areas of high conservation value are already maintained but a second blanket indicator protecting bio diversity in the individual forests is overkill and nearly impossible to maintain as it does not suggest a time line over which bio diversity needs to be maintained. Further, as we do not control the lands and bio diversity is usually over a long horizon, this is nearly impossible to check and especially enforce.

2. 2.2.7 – delete the statement that “evidence that non-chemical alternatives have been considered.” This [is] culturally relative and should already be defined by the legal requirements in the region.

3. 2.2.8 – realize that this is part of CPET but must clarify that the timely harvest of forests and thinning promoted by healthy markets is a means to promote IPM .

4. 2.2.9 – Guidance need to be expanded to assess the impacts of legislation on the failure to properly dispose of wastes.
1. Criterion 2.2 corresponds to SFI objectives 8.1 (information supplied to landowners), 8.2 (no stumpage purchased from known Forests of Exceptional Value), objective 9 (use of trained and qualified loggers), and objective 10 (mandatory compliance with BMPs) for SFI-FS.

2. In 2.2.7: Note that it is difficult (not possible on a consistent basis) to collect evidence of chemical use on third party lands as treatments in many cases occur many years before the harvest. It is our position that in the US that chemical labelling requirements in combination with applicable laws and regulations, pesticide applicator licensing requirements, result in a low risk rating. Similarly, air quality is protected the Clean Air Act and associated state regulations will consistently receive a risk rating. The use of prescribed burning is in decline in the US south even though it improves forest productivity and it [is] subject to a stringent permitting program.

4:
1. 2.2.2 reword as “The pellet mill operator safeguards against sourcing feedstocks that do not maintain or improve soil quality.”
2. 2.2.3 reword as “The pellet mill operator sources feedstocks from forests with appropriate residue removal.”
3. 2.2.4 reword as “The pellet mill operator safeguards against sourcing feedstocks in areas where ground and surface water are exhausted or severely impacted.”

7:

1. Pellet producers and our fellow wood using industries do not manage the land in our area; however, it is possible to manage “at the point of harvest” for wood purchased directly from the forest to pellet facility. Mill residuals would be more problematic but could be addressed through contract language and periodic visits to sawmills to verify their conformance “at the point of harvest.

2. Much of the wood supplied originates from small private landowners. The scale is important when considering what will be required of pellet producer. Wood users (P&P, sawmills, and wood pellet producers) can’t typically affect forest management activities, throughout the life of the forest, except for the “point of harvest” which consequently, is the point where “poor practice” can do the most damage to the sensitive items (CITIES, soil erosion, water quality, ecosystem vitality, HCV’s, etc.) listed in the SBP criteria.

9: 2.2.6 We assume that biodiversity is evaluated at the tract level within our defined Supply Base.

17:
1. 2.2.1
   a. In the south less than 3% of non-industrial forest landowners have forest management plans and very little monitoring goes on for adaptive management or compliance. 2.2.1 is highly aspiration and does not reflect the reality on the ground in the least.
   b. The SBP should consider how to encourage or management plans. This is important and missing in the SBE.
2. 2.2.3
a. “The planning and implementation of residue removals is such that harm to the ecosystems is minimised.” It is encouraging to see harvest residue removal addressed. Only KY and SC have biomass harvesting guidelines that address residue removal. The Forest Guild developed guidelines for the entire southeast. The Pinchot Institute worked with the state of Maryland to develop guidelines there.

6:  

1. Procurement-only organizations do not engage in land management, nor do they have jurisdiction over landowners private property rights. It is inappropriate to hold a procurement-only company responsible for all choices landowners make on their lands. Nor can it be expected that they will have field data to support any procurement decisions. What can be expected is that the company proactively engage with suppliers to promote certain expectations of performance that will minimize impacts on forests during harvesting activities. Indicators 2.2.1-2.2.9 need to be re-written to align with procurement activities, not forest management activities.

2. 2.2.1 The intent of this indicator is that the company engage in activities to minimize negative impacts of its procurement on the supply area, and monitor the outcome of those efforts. As stated above, this cannot be determined at a tract-by-tract level and so companies must decide how they can assess the likelihood of impacts from their activities and monitor their risk.

3. 2.2.2. As above, companies will not have tract level data and the indicator as written will not be practically audited. Re-focus the indicator to rely on contracts with suppliers to use BMPs, follow laws, and the use of trained loggers. Companies will monitor and assess compliance.

4. 2.2.3. Procurement companies have no authority over the “planning and implementation of residue removal.” Impacts to soil are covered in BMPs (2.2.2). There is little agreement nor enough scientific data to state a cut-off for residue removal. Suggest re-writing the indicator to require monitoring of soil quality in the region and of forest residues left behind after harvest.

5. 2.2.4. Traditional forestry operations have not been found to impact water quantity, nr do they require “water management”. The forests from which typical pellet companies source fiber from either natural or semi-natural stands which are not irrigated. All other water quality impacts are addressed in 2.2.2. Thus, this indicator isn’t applicable to the types of operations the SBP standard is governing.

6. 2.2.5. This indicator is completely unauditable. How would an auditor verify that forest management activities have impacted air quality? How would a company provide evidence when they have no part in forest management activities? This is not relevant to procurement companies as they don’t conduct prescribed burning. Further, in many areas, burning is an integral forest management technique which enhances forest health and regeneration, and prevents catastrophic wildfire. There are many governing laws and regulations that oversee the use of fire in forest systems in the US and prescribed burning should be allowed within these parameters.

7. 2.2.6. This indicator is also vague and not auditable from a procurement-only point of view. It also is redundant with Principle 2. SBP needs to recognize that forest management requirements are not directly relevant to Enviva L.P. as we don’t own or manage lands on behalf of landowners. Suggest aligning with Indicator 2 if there is an additional need being met with this indicator.

8. 2.2.7. This is not relevant to procurement companies as they don’t own or manage lands on behalf of landowners. We have no involvement in the use of chemicals. Chemicals applied commercially (on lands not owned) are strictly regulated, with trained, licensed
applicators to prevent mis-use. Further, chemical use itself is very expensive and not widely used in traditional forestry management. Re-word indicator to focus on regulations and controls which exist in the region of supply.

9. 2.2.8. Pest management is not applicable in the context of wood procurement organizations that do not own forestland. There is no mechanism to enforce this requirement from a procurement-only perspective or to audit it. The Standard should differentiate those activities and practices conducted by landowners and not wood procurement organizations. Government agencies monitor pests and re responsible for management and oversight into any mitigation measures. Suggest deleting requirement as it is irrelevant and 2.2.7 also addresses pesticides.

10. 2.2.9 Clarify that wastes is garbage/refuse.

3:

1. 2.2.1 - As a practical matter, assessments should be limited to the use of available data and no survey work should be required. Surveys are extremely expensive and landowners are unlikely to be willing to assume such costs in order to sell a low value product.

2. 2.2.4 – SFI Fiber Sourcing, with its requirement that BMPs be utilized and implementation monitored, should be sufficient to meet this standard for wood coming from forests that are not certified.

3. 2.2.6 – Compliance with this indicator should rely heavily on the US Endangered Species Act.

4. 2.2.7-2.2.9 - Compliance with these chemical indicators, as written, for feedstock from non-certified forests will be difficult for pellet producers to demonstrate. Forest chemicals, if used at all, are used years before the feedstock is produced and demonstration of compliance by Biomass Producers for multiple landowners is not practical. However, in the US forest chemical use is regulated both by the Clean Water Act and the Federal Insecticide, Fungicide and Rodenticide Act. The regulations associated with these Acts are developed and administered by the US Environmental Protection Agency. FIFRA, based on research, establishes maximum application rates and the conditions under which chemicals may be applied. Additionally, any chemical application that results in discharge to US jurisdictional waters must be carried out in compliance with a Pesticide General Permit that covers many of the elements included in these indicators. SBP should rely on the robust US regulatory system for forest chemical use.

18: The criteria should include requirements to leave some dead woody material to protect biodiversity. Most requirements a very vague and leaves the certifier to set the level of the standard.

21: Criteria 2.2 (harm to ecosystems minimized) does not include provisions that would ensure that forested wetlands are not harvested or even clear cut for fuel pellet production.

23:

1. 2.2.1:
   a. Involve affected people and stakeholders in monitoring and operations.
b. Assessment shall be done also through stakeholders’ consultation.

c. 2.2.1 includes topography, road, and invasive, exotic species. Mention appropriate machinery and harvesting technique to minimize and restore.

d. Add identification of values and add prior starting operations. Now it is not so specific.

2. 2.2.3: Harm minimised is not enough, it should be maintained and/or enhance.

3. 2.2.4: Mention protection of aquatic habitat and protection from grazing and livestock.

4. 2.2.5: This indicator should be valid also for Table 1 or it could lead to conflicts with sustainable biomass criteria of EU countries.

5. 2.2.7

a. Use FSC list for pesticides. Also that “non – chemical alternatives have been considered” it is not enough, use more specific requirements. (i.e. toxicants used to control pests and competing vegetation, including rodenticides, insecticides, herbicides, and fungicides are used only when and where non-chemical management practices are:

   i. not available;
   ii. prohibitively expensive, taking into account overall environmental and social costs, risks and benefits;
   iii. the only effective means for controlling invasive and exotic species; or
   iv. result in less environmental damage than non- chemical alternatives (e.g., top soil disturbance, loss of soil litter and down wood debris).

   v. The standard should be more proactive in promoting non – chemical alternatives.

b. Consider risk for non-target species and sites: “i.e. When considering the choice between aerial and ground application, the forest owner or manager evaluates the comparative risk to non-target species and sites, the comparative risk of worker exposure, and the overall amount and type of chemicals required.”

c. Keep records of chemicals used.

d. Add “and hazardous material”

6. 2.2.8: add requirement for the use of biological control agents i.e., Use of biological control agents shall be documented, minimized, monitored and strictly controlled in accordance with national laws and internationally accepted scientific protocols. Control and use of biological control agents is not regulated under the standard.

25: It is important to point out that some of the SBP Approved Controlled Feedback Systems do not assure compliance with this criterion (e.g., SFI – which is recognized by PEFC).

2.3

5. 2.3.1 – Most pellets plants of any size periodically have a third party perform regional assessments on the growth/drain, inventory, mortality, and age class distribution. It needs to be clarified that these large scale assessments can be used as evidence that the catchment productivity is maintained (already covered in 2.3.5).
1. Criterion 2.3 corresponds to SFI Objective 8.1, 9, 10, and 16 (training and education) for SFI-SF.
2. 2.3.5: Evaluating harvest levels based on the “long term productive capacity of the forest” is appropriate as it relies on a number of relevant factors such as the protecting productive capacity of the forests, BMP compliance and soil protection rather than simply upon a calculation of growth versus harvest. FIA data can provide valuable information for measuring growth and drain rates but this measure alone is insufficient and is only statistically relevant at a scale much larger than a supply catchment area.

4: Please continue rewording as formulated in the examples above [see respondent #4’s comments in 2.1 & 2.2]. If the pellet mill is the source of certification, then only the pellet mill can be held accountable for certain activity and the standard should make this clear.

7: 1. Economic factors (supply/demand) have historically kept a balance in the market place. Vibrant markets, for wood products, have continued to promote forest management, reforestation and industry growth for the past 50+yrs in the US Southeast. Low supply = higher wood prices; higher prices = reforestation = more forests. For our area, a lack of markets = low demand = decrease in reforestation.
2. Management activities, reforestation, growth & yield, growth/drain, etc. can be monitored on a regional, state, and county level for trend analysis across the SBE. Stand level analysis will be impossible due to the ownership and management realities in our regions supply chain.

9: 2.3.1:
1. Many small landowners do not currently have well documented management plans. The complexity of these plans will vary based on the resources available to the land owner and the size of their land holdings.
2. It might be necessary to rely on regional or state level growth & yield data.

17: 2.3.2 - This indicator is a good example of something that is pretty widespread through-out all of this. I understand that third-parties may provide documentation of all indicators but that the pellet mill is ultimately responsible for implementation of all of the indicators. There is no way that the pellet mill can ensure that most of this stuff is implemented. In a way, many of the indicators are forest management certification criteria and indicators. The link between the mill and the forest management unit feels really tenuous. Some of this falls under the means of verification.

6:
1. 2.3.1 This requirement is outside the scope a wood procurement/fiber sourcing program. Management plans, harvest levels, growth and yield information are considered proprietary by landowners and are generally not available to wood procurement organizations. The Standard should differentiate those activities and practices conducted by landowners and not wood procurement organizations. Further, given that the SBE is a regional risk assessment, the standard should not focus on individual plans but overall productivity and trends as the regional level. This requirement is not applicable to individual procurement organizations, and as written, not auditable in the
procurement-only context. Suggest combining 2.3.1 – 2.3.2 into a company monitoring program that uses appropriate regional data to assess the overall state of forests in the supply area. This could possibly also include 2.3.5 (growth and drain).

2. 2.3.2 Clarify that this is monitoring of the procurement companies overall program management and data collection programs to evaluate data and incorporated learnings into processes and that this is not intended to be audited at the tract level. If this is as stated, then it may make more sense in Principle 3 than in Principle 2.

3. 2.3.3 Clarify if this requirement applies to a company’s wood procurement operations – if so this could align with Principle 3. However if the requirement is related to performance at the region level, then the vagueness needs to be address and it also seems to add little value beyond Indicators 2.3.1-2.3.2. Suggest moving to Principle 3 or deleting as it is covered in other indicators.

4. 2.3.4 Needs clarification that training can only be required by a company for its employees, and those entities with which it has a direct contractual relationship.

5. 2.3.5. Clarify this at the regional level

6. 2.3.6. It isn’t clear what has to be contributing positively towards the local economy. Clarification would be helpful – is it local hiring? Or is it simply that utilizing a low value feedstock brings jobs and revenue to rural communities?

3: 2.3.1, 2.3.2, 2.3.5 - For these indicators the SBE should rely heavily on the US Forest Service Forest Inventory and Analysis program which tracks the growth and removals, among other things for forests in the US.

2:

1. 2.3.1: The majority of private forest landowners in the US do not have written management plans on their forests. However, the majority do receive professional forestry advice from registered foresters, consulting foresters, state forestry professionals and professional harvesters. The successful implementation of this professional advice can be demonstrated in the high level of compliance across the country with Best Management Practices and therefore places into question the need for verification of this indicator through documentation that is not utilized because it is unnecessary.

2. 2.3.5: Again this appears to be an attempt to control landowner management practices with a shadow criterion for mandatory reforestation. The current wording begs to question the boundaries of the sample area used to measure adequate inventory. It also puts into question the measurement of productivity.

22: 2.3.1: “Are harvesting yields per hectare for different species known to ensure maximum productivity is maintained?” What is the meaning of ”maximum productivity”? Maybe “high” is more relevant?

23:

1. 2.3.1:
   a. Describe also “desired future conditions”
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|   | b. Keep records of NTFP harvested. The requirement for NTFP is broad.  
   c. Add cost and revenues in the planning, not only long – term productivity.  
   d. Missing points under this indicator: protection of public values, include impact on NTFP, old growth, riparian habitat and species, landscape connectivity, road and transportation.  
   e. Include management of Invasive species, exotic species, and biological agents.  
   f. Protection of under-represented habitat,  
   g. Description silvicultural practices and maps at FMU level. |
| 2.  | 2.3.3: Add minimize and restore impact |
| 3.  | 2.3.5: Include diversification of products. Now it is briefly mentioned. |
| 4.  | 2.3.6:  
   a. Missing the focus on career development, high quality and long – term jobs.  
   b. Provide learning opportunities to improve public understanding of forest and forest management (i.e. sustainable biomass).  
   c. Include Civic activities promoted by Certificate holders (depending on scale of operations) |

2.4

1. Criterion 2.4 corresponds with SFI objectives 8.1, 14, (legal and regulatory compliance), and 15 (Forestry research, science and Technology) for SFI-FS.  
2. This is a good criterion because it is uniquely different than biodiversity or harvest levels and serves to value forest thinnings which improve forest health and productivity. However, the evidence will be broad and not easily served by a single metric. Examples of evidence include implementation of BMPs and soil protection as well as thinning activities.  
7: These criteria can be monitored and reported on a macro level through efforts of 3rd party, state and federal agencies. The wood production facilities in our area do not own or manage the forests. The pellet producer’s wood requirements will be very small in comparison to the rest of the “traditional” forest product industries. Neither of which manage the forest.  
6:  
1. 2.4.1 This requirement is beyond the scope of the current program of procurement companies because they do not have direct management responsibility for the forests. It is vague and duplicative of those dealing with HCVs, biodiversity, soil quality and productivity. Suggest deleting.  
2. 2.4.2 This requirement is beyond the scope of the current wood procurement programs which do not have land management responsibility or authority. It is also redundant of many indicators in section 2.2. and not auditable – how would an auditor determine that landowners are “managing natural processes?” Fires and pest monitoring, prevention and control are the responsibility of State Forestry Agencies. Suggest deleting or if necessary align with other indicators around productivity and chemicals.
3. 2.4.3 Align with Principle 1

3: 2.4.3 – Illegal logging should be considered low risk in the US.

23:
1. 2.4.1:
   a. Include restoration of forest ecosystem.
   b. Include old growth forests (the term is not used).
   c. Describe landscape conditions.
   d. No incentives for use of native and locally adapted species.
2. 2.4.2: Specify requirements for invasive and exotic species. Only pests are mentioned under SBP.
3. 2.4.3:
   a. Undertake actions to correct the situation (when one of the illegal activities occurred).
   b. Incentivize cooperation with local authorities

25: It is important to point out that some of the SBP Approved Controlled Feedback Systems do not assure compliance with this criterion (e.g., SFI – which is recognized by PEFC).

2.5
1:
1. Criterion 2.5 corresponds to SFI objectives 8.1, 8.2, and 9 for SFI-FS.
2. It seems that there is a lot of overlap between this and Criterion 2.1.

7: Direct land management activities, such as ensuring biodiversity, are not influenced by the purchasers of wood. The exception would be point of harvest. Forest Management and environmental protections are governed by state and federal agencies.

17:
1. 2.5.1
   a. “Key ecosystems and habitats are conserved or set aside in their natural state. (CPET S8b).”
      i. The SBP identifies several CPET Criterion throughout. [which ones?]
   b. RSB Conservation Impact Assessment Guidelines RSB-GUI-01-007-01
1. The terms "key ecosystem and habitats" are overly vague and subjective. The Standard should instead rely on RT&E species protection and High Conservation Value, which are addressed in Indicators 2.1.1-2.1.3. This Indicator is also outside the scope of wood procurement activities and responsibilities. Protected lands are the responsibility of government agencies and/or a landowners decision. Suggest deleting.

2. The terms "outstanding" and "exceptional" are overly vague and subjective. See comment for 2.5.1. Suggest deleting.

3: As suggested in 2.1.1, prescriptive definitions should be avoided and the ecological benefits provided by public lands, if relevant, should be included in the SBE.

18: The lack of definitions and clear requirements make the criteria difficult to implement in a satisfactory way.

21:

1. Criteria 2.5 (management ensures biodiversity is maintained) does not include provisions that would ensure that forested wetlands are not harvested or even clear cut for fuel pellet production.
2. Forested wetlands could be included in high conservation value forests or high biodiversity forests, but there is no requirement to include them [meaning it would be good to include them].
3. There is no requirement to include forested wetlands in "key ecosystems and habitats" [meaning it would be good to include them].

22:

1. 2.5.1 - Partly overlapping [with] 2.1.1 (HCVF) in the case when (strict) HCVF status is missing?
2. 2.5.2 - Partly overlapping [with] 2.5.1?

23:

1. 2.5.1: Conserved is not enough, add restoration. Include old growth forest and connectivity.
2. 2.5.2: Include requirements to review the key ecosystems (though review in the management plan and with a timeline)

2.6

1: [Edit note: NB these comments from respondent #1 are repeated in 2.6 – 2.9 below for completeness]

1. Criteria 2.6 through 2.9 correspond to SFI objective 14 (legal and regulatory compliance) for SFI-FS.
2. This is another example of where the strong legal framework applied in the US produces a low risk rating. This would be consistent for all SBEs in the US and should not require a repeat of evidence by all of the pellet mills.
3. Logger training performed under SFI-FS reduces risk in criterion 2.9 also.

7: Non issue
2.6.2 Any potential endangerment to food and water supply would be addressed by multiple government agencies (forestry commission, state level environmental management, federal EPA, etc.) and we propose this be included in the supply base risk assessment. Requiring interviews with local communities can become a daunting and impractical task given that we sometime issue over 200 contracts in our supply base in a given year. A notice on our web site along with notification to the state forestry commission might be a practical solution.

6:
1. 2.6.1 is covered by valid PEFC & FSC CoC certificates and should not be subject to additional verification.
2. 2.6.2 is not applicable in North America.

3: The SBE should be able to rely heavily on the robust legal and regulatory system in the US.

20: 2.6.1 states “The legal, customary and traditional tenure and use rights of indigenous peoples and local communities related to the forest are identified, documented and respected” without setting any requirements on how sufficient respect should be proven. This leaves it to the biomass producer to decide whether rights of others have been respected or not. A normative requirement of ‘free prior and informed consent’ should be included as a minimum, instead of just referring to it as a guidance.

23:
**CW Alignment (table 1 comparable to FSC – CW)**
1. 2.6.1: ILO 169 is mentioned under this criterion, but it is not part of table 1. This should be changed to guarantee the alignment between FSC CW and Table 1.

**Comment on Principles and Criteria**
2. 2.6.1 and 2.6.2: Missing compensation for damages to indigenous people or local communities.
3. 2.6.2:
   a. Add: “Representatives of Indigenous Peoples (IPs) are involved in operations and monitoring in indigenous territories.”
   b. The agreement shall be written and the consultation process adapted to local culture.
   c. Sites of importance for IPs (culturally or for religion) shall be identified and clearly mentioned. This goes beyond HCV.
   d. The standard shall have requirements on identification of IPs’ or local communities knowledge used; provide written agreement and protocols for use of this knowledge; and protect this a knowledge.
   e. This indicator should be valid also for Table 1 or it could conflict with sustainable biomass criteria of EU countries.

2.7
1: Criteria 2.6 through 2.9 correspond to SFI objective 14 (legal and regulatory compliance) for SFI-FS.
2. This is another example of where the strong legal framework applied in the US produces a low risk rating. This would be consistent for all SBEs in the US and should not require a repeat of evidence by all of the pellet mills.
3. Logger training performed under SFI-FS reduces risk in criterion 2.9 also.

7: Non issue

23: **CW Alignment (table 1 comparable to FSC – CW)**
1. 2.7.1: Dispute resolution is part of FSC CW, but 2.7 is not part of table 1. This should be changed to guarantee the alignment between FSC CW and Table 1.

### 2.8

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<td>2.8.5 Add that the wages are fair. Complying with minimum wages is not necessarily enough.</td>
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### 2.9

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<td>2.9.1: Add “their families”. When families live in the site of operations, this is particularly relevant.</td>
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</table>
| 2.10 | 5: 2.10.1 – this needs to reflect the wording of the EU RED: i.e., that you can still harvest from wetlands but that they need to remain wetlands after harvest. How it is worded now it is not clear over what time period the carbon stocks are assessed.  

1:  
   1. 2.10.1 The guidance here should also state that to goal is to prevent the conversion of wetlands, continuously forested areas, and peatlands. It should be noted here that RED defines wetlands as land that is covered by or saturated by water permanently of for a significant part of a year. The US legal framework includes a number of gradations of wetlands including what is termed “jurisdictional wetlands” that support southern pine stands of timber.  
   2. Carbon accounting of forest stocks at the supply base scale is problematic and not supported by existing data protocols. FIA data, for example, is designed to be valid at a broader regional scale. Too small a scale also creates issues with the proprietary nature of inventory data that is collected on private lands. 2.3.5 already addresses the long term productive capacity of the forest which is directly correlated to carbon sustainability. It is a more appropriate surrogate for carbon sustainability at the Supply Base scale.  

7: 2.10.2 Suggest Macro view to carbon accounting and assessing risk.  

9: 2.10.2 Specific carbon accounting calculations have not been provided. We believe that a growth and drain model might act as a sufficient proxy for this requirement as the ultimate objective is to prevent conversion of land from forested to non-forest use.  

17:  
   1. 2.10.1  
      a. “Biomass shall not be sourced from areas that had high carbon stocks in January 2008 and no longer have those high carbon stocks.”  
      b. How are areas of high carbon stocks defined and evaluated using historical data?  
   2. 2.10.2  
      a. “Carbon accounting demonstrates that harvesting does not diminish the capability of the forest to act as an effective sink or store of carbon over the long term. “ any harvests will diminish forest carbon stores for a time period. What is the real intent here? Needs a spatial and temporal scale.  

6:  
   1. 2.10.1 Clarify that “high carbon stocks” are wetlands and peatlands. |
2. 2.10.2 The terms “carbon accounting” are problematic in that it is not clear what is being accounted for or how. Clarify the intent – is it simply that one can demonstrate carbon stocks are not being depleted in the region? There is no accounting needed to do so as public data exist on forest inventories.

3:

1. 2.10.1 – Wetlands are defined by regulation in the US and the definition is more broad than is typically used in the EU. There are millions of acres of forested wetlands (US regulatory definition) in the southeastern US that are managed as planted pine forests and the US regulatory system has found such management to be compatible with wetland function. These forests will be sources of feedstock. There are other certain forested wetland types that by regulation are essentially off limits for the establishment of planted pine forests and those wetland types are a closer fit with the definition of wetlands included in the SBP Standard. Having said that, SBP should reconsider its ban on feedstock from these wetter forests that fit the SBP definition of wetlands. The production of feedstock to be converted to pellets does not drive the decision to harvest such forests; rather sawlog values are the most important factor in harvesting decisions and the low value feedstock that finds its way into pellet production from these wet forests is a “come along” product. Disqualifying such feedstock may require pellet mills to haul other qualifying feedstock much greater distances to replace it.

2. 2.10.2 – The SBE should rely heavily on existing FIA information and analysis based on it.

21: Indicator 2.10.2 of the Standard #1 does point to taking note of the forest carbon stocks... stating “carbon accounting demonstrates that harvesting does not diminish the capability of the forest to act as an effective sink or store of carbon over the long term”. Unfortunately, this is also a poorly defined criterion which won’t require measuring the GHG balance of the harvesting carried out for the purposes of the biomass producer, specifically. The wording also allows depletion of carbon stocks in the next several critical decades. Importantly, neither standard 1 nor 5 make an effort to minimize the ‘carbon debt’ created when burning wood directly for power production.

22:

1. 2.10.1 - A man-made 100 years old spruce forest area is cutted year 2010, which means that the carbon stock in the area has decreased (temporarily) – a conflict with the Indicator!

2. 2.10.2 - Estimations of carbon stocks are for one or another (political) reasons must be included in the standard maybe the following simplification should be useful: Since the standing forest volume reflects the majority of the total carbon stock it should be sufficient to use the forest stand volumes to indirectly judge changes in carbon stocks.

20: 2.10.2 of the Sustainable Feedstock Standard SFS points towards taking note of the forest carbon stocks as well, stating “carbon accounting demonstrates that harvesting does not diminish the capability of the forest to act as an effective sink or store of carbon over the long term”. Unfortunately, this is also a poorly defined criterion which won’t enforce the measuring of the GHG balance of the harvesting carried out for the purposes of the biomass producer, specifically. The wording of the indicator does also in fact allow depletion of carbon stock.
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<td>7: We understand the risks associated with GMO’s. What about the planting and use of non-native trees species and their effects on native ecosystems?</td>
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**Principle 3. Systems ensure continued compliance**

**Comments and justification for proposed amendments**

<table>
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<tr>
<th>General comments</th>
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<tr>
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<th>3.1</th>
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<tr>
<td>1: SFI Fiber Sourcing provides for the development of systems, policies, training and procedures that verify the meeting of the objectives and indicators. SFI Fiber Sourcing objectives overlap with the criterion as provided above. In all of these cases, the established procedures provide evidence of continued compliance. In this sense, SFI Fiber Sourcing is the most rigorous of “controlled wood” schemes.</td>
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<td>7: Non issue</td>
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<td>13: The indicator for 3.1.2 indicates that &quot;The management system shall include all required written documented procedures.&quot; However, the guidance for 3.1.2 indicates that &quot;Not all procedures need to be documented...&quot; This seems to be contradictory.</td>
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1. 3.1.2: This indicator (written instructions) should be valid also for Table 1. This to guarantee the alignment between FSC CW and Table 1.
2. 3.1.3: This indicator (identification of personnel responsible for implementing procedures) should be valid also for Table 1. This to guarantee the alignment between FSC CW and Table 1.

Comment on Principles and Criteria
3. 3.1.1:
   a. Add that the Certificate holder demonstrates long – term commitment to the SBP standard.
   b. Add a management system appropriate to scale and intensity of operations.
   c. Add that these reports shall be publicly available, except confidential documents
   d. Management System (or Plan) lacks clear deadlines for update.

24:

1. 3.1.1 States that “the management system shall be appropriate to the type, range and volume of work performed” and the means of verification lists “documents and interviews indicate that this requirement is met”.
   a. Where the management system includes the use of an IT system, we propose that further requirements should be introduced such that the organisation is comfortable that the IT system (and any reports it produces or calculations it performs) is accurate, reliable and suitable to the current and future scale of operations.
   b. We propose that the means of verification for such a requirement should include as a minimum:
      i. the inspection of results from testing performed at the time the system was implemented;
      ii. review of controls around any code changes introduced to the system; and
      iii. re-performance (on a sample basis) of any automated calculations performed by the management system.

3.2

7: Non issue

25: It is important to point out that some of the SBP Approved Controlled Feedback Systems do not assure compliance with this criterion (e.g., SFI – which is recognized by PEFC).

STANDARD #2: Standard for the Evaluation of Feedstock against the Sustainable Feedstock Standard

<table>
<thead>
<tr>
<th>Section #</th>
<th>Comments and justification for proposed amendments</th>
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<tbody>
<tr>
<td>General comments</td>
<td>9: It should be recognized that tornadoes are very common in the southeast U.S. and they often impact timber tracts. It is not unusual to receive requests from government agencies and private landowners to assist in removing downed material which would otherwise be used for pellet</td>
</tr>
</tbody>
</table>
production or other material which would traditionally be utilized for higher value products. If an Act-of-God situation (involuntary conversion including wind, wildfire, infestation) occurs the Producer should not be penalized for use of improper materials. This can also impact carbon stocks levels if the event causes widespread damage in a particular Supply Base.

12: See accompanying information on the Ontario forest management system for crown lands – about 58 million hectares of forest lands, the commercial crown forest land base.


1: SFI Fiber sourcing and SFI COC should be an approved Controlled Feedstock System. Lack of acknowledgement here is a direct conflict to the SBP mission statement.

4: The definition of SBP Approved Forest Management Schemes should be interpreted, per comments above, to include SFI fiber sourcing

13:

1. Lines 58 – 59 Re SBP Approved Controlled Feedstock System - It is not clear why material supplied with other FSC or PEFC claims (vs. only an "FSC Controlled Wood" or "PEFC Controlled Sources") would not constitute an eligible input to SBP compliant Secondary Feedstock.
2. Line 66 – 67 It is not clear what constitutes "an appropriate verification process".
3. Line 75 – re FSC-STD-40-007 (Version 2-0) EN. How is the application rendered?

23: Definition of SBP-compliant Secondary Feedstock: We disagree with this feedstock to be subject to “controlled feedstock” assessment only. This material should be assessed against the full set of principles&criteria as it is likely not a marginal part of pellet resources and tracing the origin is not more difficult than Primary Feedstock, provided the first-step wood processor cooperates.
1. **SBP Compliant Primary Feedstock** - We have serious concerns with feedstock being recognized as “SBP Compliant Primary Feedstock” based solely on a “low risk” determination during the SBE – especially in light of the limitations of the analysis (see related comments on desk audits).

2. **Controlled Primary Feedstock** - Limiting the SBP requirements for Controlled Primary Feedstock to the subset of Criteria (Table 1) is seriously deficient. This list needs to be expanded to include verification of additional sustainability criteria.

3. **Sub-scope** - Determination of appropriate sub-scope designations is vague and inadequate (see comments in #6). Assumptions around equivalent risk categorizations will be open to subjective interpretations in the absence of any real verification.”

### 5 Specific question: What do you think of the regional approach proposed? How does it compare to the Due Diligence System or Regional Risk Assessment approaches adopted by PEFC, FSC or other standards?

5: How written, it is not clear who determines the risk level of each indicator or rather it seems as if the supplier is. Likely should make clear whether we are assessing the risk level and this is then audited by a CB or whether a CB actually defines the risk level. This may be written elsewhere in the standard but wouldn’t hurt to make it clear earlier in the Standard.

14: The general approach makes sense, in particular the complementarily between SBE and SVP is appropriate. The SVP procedure appears to be insufficiently documented though (only 3 sentences on point 12).

1: The regional approach is sound and requires a landscape assessment of the sustainability factors to be considered. The risk assessment approach is an additional requirement to the site specific management planning and best practice implementation of SFI Fiber Sourcing Certification. However, in combination, a powerful assurance of sustainability is achieved – the programmatic use of SFI-FS creates a lower risk within the supply base which is followed up with site specific protective actions which are audited by a third party.

- Section 5 should be moved up in front of section 2 to provide orientation on how the SBE should work
- The Supplier Verification program needs more description – what will the likely processes and deliverables look like.

4:

1. We support the proposed regional approach. However, this section does not provide much additional detail on the specific scope of the regional approach – see our comments above for suggestions on providing clarity around this and what pooling of pellet producer resources should be allowed.

2. In lines 105-106, it states that any indicators that are not classified as low risk prevents the feedstock from achieving SBP compliance. However, a sufficient mitigation plan for any indicators not classified as low risk should allow the pellet producer to achieve complete SBP compliance (not just a controlled feedstock). This is a very important issue for incentivizing mitigation approaches and expanding better management practices.
7: 
1. The regional approach is rational. It is my opinion this is compatible with the FSC RA; although, the finer details of the SBE are yet to be seen with its application to an actual supply base. It is difficult to comment without first seeing how the risks will be assessed. For example, there is much subjectification when defining “biodiversity.” To what level, to what degree will mitigation measures be required?
2. I see little problem if the SBE follows a similar path as FSC RA.
3. There could be situations where a single regional SBE would be applicable to more than one biomass producer in a given area.

9: We prefer a regional approach as it reflects conditions in the areas where we operate. FSC plans to move to a national risk assessment but will only consider the areas within that assessment that pertain to our Supply Base. We will not be required to mitigate anything that is in the national assessment provided it is not in our Supply Base.

17: Has FSC done a regional risk assessment for the south? It is conceptually similar to PEFC and FSC but I would like to see a case study or two of its implementation to help illustrate the decision points. For instance I would like to know more about the risk mitigation procedures. Essentially how are risks to be controlled?

6: The only way this will be able to be implemented, managed, documented and audited is if the SBE is maintained at a regional level. Further, it must be maintained as a risked-based approach in which the companies processed to address, mitigate and monitor risk are audited. This procedure cannot be appropriately or practically implemented if it is intended to verify every indicator at the tract level.

12: Assuming SBP supports this statement from their SBP-Key-Concepts-in-the-BAF-Consultation-Draft-March-2014.pdf document: “SBP has developed its standards around two schemes in particular, PEFC and FSC, and recognizes material certified under their requirements. Material supplied as being fully compliant with PEFC endorsed and FSC standards is considered by SBP to meet its requirements for sustainable feedstock. The chain of custody requirements and the requirements on certification bodies undertaking audits are also based on FSC and PEFC requirements.” There is no issue here in Ontario or likely any other province in Canada (In Canada, forest management responsibility is delegated to the provincial level and not kept at the national level).

13: Lines 105 -106 This statement seems to effectively eliminate Indicators rated as Specified Risk with corresponding mitigation measures from being classified as SBP compliant feedstock. It’s not clear if that is the intent.

23: The key actor in the BAF related to the forest impacts is the pellet mill, which is to apply a regional risk assessment approach. Such an approach does not guarantee performance of individual forest management units, and that is not required either. For FSC this is an unreliable method of ensuring sustainable forest management. This is another unacceptable flaw of this system.
24: We appreciate the rationale for the proposed regional approach, though we also welcome the increased flexibility in defining sub-scopes in section 6 (allowing for further disaggregation of the supply chain by other geographical, ecological and operational factors) as our experience is that Biomass Producers are likely to source a mix of different feedstock types from the same area, which are likely to have differing risk profiles, despite sharing a supply base region.

25:
1. The deficiencies associated with the regional approach relate primarily to implementation requirements – rather than the concept itself. These implementation deficiencies include, for example:
   a. Reliance on data supplied by parties with vested interests;
   b. lack of adequate verification of this data;
   c. limitations to desk audits only based on subjective decisions; and
   d. decisions around risk classification that are not supported by credible or meaningful assumptions.

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4: We think the option of defining sub-scopes is very useful and should not be lost from the scheme. This is an important option for allowing producers to focus on those areas of most potential risk, put in place more targeted mitigation strategies, while also reducing costs of compliance.

24: Lines 120-121 state “Although definition of Sub-scopes will vary, within all Sub-scopes the risk rating of all Indicators will be the same. The risk rating of individual Indicators between Sub-scopes may be different”. Please would you be able to provide some further clarification (perhaps by way of example) as to what you mean by this statement?

25: An assumption that areas within a specific sub-group all have the same risk rating lacks scientific credibility. Ecological and operational factors vary widely – even within the same geographic area. Legislation that addresses many of the sustainability criteria may be insufficient or even absent, so assumptions that legislation mitigates risk is not credible in many places – including the United States (e.g., the US South).

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**Specific question:** What level of proof is acceptable in determining low risk?

5: The level of proof should at this time be determined by the CB and we should not get stuck trying to define at this time as it will be completely different depending on the indicator and the scale of operations. This is a question which is likely better saved for the guidance papers which will be written at a later date (relatively soon).

14: This is the key question indeed and it is essential the standard establishes it with a maximum of clarity, otherwise it will be left up to the appreciation of each individual CB/auditor and there will be a lot of room for interpretation, resulting in a lack of credibility for the scheme. We
don’t have any advice about the level of proof required for low risk: whatever the level SBP wishes to reach, it has to be much more clear in the standard than it is now.

1: Flexibility needs to be allowed here as stated in standard 1. The scale of operations and the underlying legal framework are background factors, for example, that can influence risk. Existing and proven fiber sourcing programs such as SFI a Fiber Sourcing should be recognized as sufficient means to document and collect evidence for low risk in the relevant criterion. Criteria that are not addressed by proven sourcing programs like SFI Fiber Sourcing can be handled through a series of bespoke evidence that provide comfort of low risk.

4:
1. This is potentially the most important question of the entire consultation. Above all, the scheme should be clear about what exact information pellet producers need to provide in order to support a low risk classification.
2. For Principle 1, pellet producers should be able to provide regional statistics on rate of compliance and conformity with each of these criteria by the landowners in the region. If the rate of compliance, as measured and verified by an official statistics-gathering body or 3rd party consultant, is over 90%, then the criteria should be automatically defined as low risk. If the rate of compliance is lower than 90%, then the pellet producer should be able to provide more detailed, site specific information to prove low risk status. If statistical evidence is not readily available a statistically-robust regional survey should serve in the place of official statistics and provide the rate of compliance.
3. For criteria 2.1.1, the pellet producer should have the maps and definitions in their files.
4. For 2.1.2, if the supply base does not contain a high conservation value forest, the classification should automatically be low risk. If the supply base does contain a high value forest the pellet producer should be able to show a map locating the high value forest and show evidence that their protocols do not allow for any feedstock sourced from that area – this should qualify the pellet producer for low risk status.
5. For 2.1.3, the pellet producer should have a list of potential rare, threatened, and endangered species in their supply base, maps of suitable habitat for these species, and proof that landowners in these areas have management plans for preventing impacts on these species. This should qualify the pellet producer for low risk.
6. For 2.1.4, the pellet producer should have a map of forests in January 2008, show the areas of natural and semi-natural forest on that map, and indicate in their operating procedures that they do not source from these areas. There also needs to be a better definition of what is “semi-natural” forest.
7. Criterion 2.2.1 is incredibly broad and it is important for the scheme to define what list of specific “impacts” it is referring to, particularly in ways that do not overlap with the subsequent criteria. If this criterion cannot be better defined it should be struck from the list. Otherwise existing forestry best management practices that are in place for the region and statistics on rates of compliance should be suitable for proving low risk in this category.
8. For Criterion 2.2.2-2.2.9, the pellet producer should indicate in their operating procedures that they do not source from suppliers that do not follow BMPs or legal requirements for soil protection, chemical management, water protection, etc. Statistical evidence of compliance
in the supply base over 90% should be evidence of low risk here. If BMPs or laws in the region do not cover one of these issues, the pellet mill producer indicates what expectation they have of landowners to meet minimum standards for observing these criteria in their operating protocols and educates landowners on these requirements. This mitigation strategy should provide the pellet mill with a low risk classification across these criteria.

9. Criterion 2.3 does not make very much sense and seems to simply add a burden on pellet suppliers – why would forest managers not manage the forest for productivity? This would be like a soy farmer not managing for high yields on his farmland. Sustainability criteria should focus on issues that are not already incentivized by the market, in order to be of any added value. Criterion 2.3.5 is a reasonable issue given concerns around land carbon stock – this criterion should be proven as low risk through regional growth: drain data.

10. Criterion 2.4 is another very broad and poorly defined requirement that is duplicative of other criteria in the standard. 2.4.1 in particular should be better defined to cover only issues that are not already covered under other criteria and clearly indicate the requirements for those issues. 2.4.3 seems to be duplicative of 1.4.1.

11. For 2.5, pellet mill operators should have a list of state and federally recognized key ecosystems and habitats, maps of these areas on the supply base, and indicate in their operating protocols that no feedstock can be sourced from these areas. This should qualify the pellet mill operator for low risk status.

12. For 2.6, in supply bases where there are no indigenous or traditional groups, and in regions that are defined as having a strong rule of law and observance of land property and use rights, pellet mill suppliers should automatically qualify for low-risk status.

13. For 2.7, in regions that are defined as having a strong rule of law, legal access, and observance of land property and use rights, pellet mill suppliers should automatically qualify for low-risk status.

14. For 2.8 and 2.9, the standard should recognize the labor laws of various countries as sufficient for classifying pellet producers as low risk. Pellet producers are not in a position to enforce national or international law, but can make sure to operate in areas that have strong rule of law and strong labor laws.

15. For 2.10, pellet producers should be classified as low risk in the same way as 2.3.5, through regional growth: drain data.

16. Across all of these criteria, the pellet producer should be able to show that their management and staff are all well-educated on the operating protocols and have had training on how to follow them in order to meet this standard. The pellet producer will of course also have the chain of custody scheme in place to be able to prove source of feedstocks. That in combination with the evidence of requirements in operating procedures should qualify the pellet mill for low risk classification across criteria.

| 7: Each indicator will obviously be different. There are many indicators that could be deemed low risk based on a regional SBE and no further action required. It is our contention that our FSC Risk Assessment combined with Company Procurement Systems Plan (FSC Certified) is auditable proof for most of the criteria. Some proof will require site visits to actual harvests and through the supply chain to verify origin. With some criteria, related to more general conditions related to the management of the forests themselves, the proof will be given from a macro view of the catchment relying on regularly published scientific data and evidence from 3rd party, state and federal agencies. |
9: Many indicators can be rated as low risk due to the presence of local, state and federal laws (i.e. child labour laws, worker labour rights, health & safety, etc.). We propose the use of existing risk assessment and due diligence systems associated with FSC (Controlled Wood) and PEFC CoC certifications.

17: Good question. In the SBP framework the 1st party (pellet mill) and auditor seems to be the ones who decide this... If you can trace the material back to a harvest site then risks are reduced. If you can work with suppliers (i.e. logging companies) who know which harvests to avoid and commit to doing so, then this reduces the risk, BUT actually implementing something like this is challenging. I would suggest interviewing paper companies (e.g. Domtar sourcing using FSC Controlled Wood) what risk mitigation systems are they using for sourcing pulpwood?

6: There are many different mechanisms for proof of low risk depending on the indicator, scope and companies operating context. Where region specific publically available data exists from regulatory bodies or peer reviewed data, these sources can suffice as low risk. Other documentation from company’s monitoring programs, training records, or internal documents can also be used. However at this point in standard development, we shouldn’t be limiting the types of data that can be used – companies should be free to use the data they feel best supports their decision and the auditor ultimately will determine if it is credible or not.

3: In the US the scoring of risk should rely heavily on the robust system of laws and regulations found in the US.

18: We find the adoption of FSCs language unwise in this case, as the language refrains from recognizing the fact some areas are actually risky to source from. Linguistically ‘unspecific risk’ means that we haven’t looked at the risk it or haven’t decided what the risk is. ‘Specified risk’ means we have determined the risk. ‘Low risk’ means that the risk is low. The natural continuation of this is to include the category ‘high risk’. Building a risk assessment system without being willing to classify some areas as being ‘high risk’ seems rather half hearted.

12: Here in Ontario, on crown land, there is a legal requirement for compliance monitoring and reporting. I would suggest that legal requirement is sufficient proof of low risk for crown land. On private lands, the land owner typically adopts the crown standards.

23: See our answer under 5 above: for claiming that materials come from a sustainably managed forest, the forest itself needs to be certified.

24:
1. There should be sufficient proof available such that, were the results to be published, a similarly experienced person would be likely to arrive at the same conclusion.
2. When verifying a low risk statement, the certification body should be required to perform independent research, where possible, in order to gain comfort that the evidence being presented by the Biomass Producer is complete and has not been specifically selected to provide a positive evidence base.
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<td>3.</td>
<td>If any evidence is obtained which indicates that there may be a risk of non-compliance with the Indicator, then the Indicator should be scores as either a Specified Risk or Unspecified Risk.</td>
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<tr>
<td>25:</td>
<td>Determination of “low risk” must cover the full scope of sustainability criteria and be accompanied by adequate documentation and a sample based field audit by an independent body (Certification Body) to verify accuracy.</td>
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<td>8</td>
<td>5: The fact that we are allowed to “infer” the place of origin for secondary biomass is likely problematic for NGOs. Suggest just leaving the word “determine”.</td>
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<tr>
<td>7</td>
<td>No issue. I especially appreciate the clarity of this section (no sarcasm implied).</td>
</tr>
<tr>
<td>25:</td>
<td>Adequate documentation must be in place for the Biomass Producer to determine place of origin. The language in this section includes the term “infer” which implies such documentation may not be in place to sufficiently determine place of origin.</td>
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<td>9</td>
<td>5: In previous sections, it has said that the BP is carrying out the SBE. We should likely say here that the BP is able to carry out the SBE and also say in previous sections that the BP can have a third party perform the SBE or perform it itself as long as the performing party meets the reqs outlined here.</td>
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<tr>
<td>7</td>
<td>No issue</td>
</tr>
<tr>
<td>9</td>
<td>SBP should maintain a list of acceptable SBE bodies on its website. The SBEs should be required to participate in initial training to ensure the standards are applied on a consistent basis.</td>
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<td>12:</td>
<td>If the forest management is documented and signed by a legislated professional, as required here in Ontario, does the wood pellet producer still need staff with “appropriate knowledge and experience relevant to evaluating” the feedstock standard?</td>
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<tr>
<td>25:</td>
<td>Additional competencies are needed given the central reliance on the SBE for risk determination. For example, the “Body” must be very familiar with all of the applicable laws and regulations as well the ecological values of the resource.</td>
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<td>10</td>
<td>5: Not all indicators will require sampling per se. Likely best to make clear that a sampling methodology shall only be required for those indicators within the SBE that require sampling data from the BP.</td>
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14: ‘In undertaking the SBE, a sampling methodology will be implemented to ensure that there is a credible determination of risk rating across the SBE.’ This is really vague because we don’t know how much to sample, how the sample is selected and what is supposed to happen with the sample (selected suppliers to be further visited/audited/contacted/scrutinized?...), what happens if an element of the sampling proves non compliant, etc... Additionally, I don’t think the sampling can lead to the determination of risk: it is usually the other way around. The level of risk leads to determine the size of the sample.

1: It is unclear what is meant here.

4: It is unclear what is meant by a sampling methodology. Per comments above on requirements for proving low risk, some categories may require sampling but others should rely on existing data. Sampling should not be required for all and possibly any criteria.

7: No issue assuming the sample size and audit are reasonable with regard to duration.

6: Sampling seems out of place here. What are we sampling? If you only need to do additional verification if you have determined specific risk factors, this seems to apply to that process, rather than the entire SBE process.

25: Acceptable sampling methodology must be defined by the SBP to insure consistent application across producers.

**Specific question:** What level of stakeholder consultation would you expect / find acceptable? Would it be similar to the approach taken by the FSC and PEFC schemes or can you suggest another approach?

5: I dare say that this is reasonable.

14: This point needs careful consideration as stakeholder consultation might result in high costs, particularly when it becomes part of the certification process. We also suggest defining very precisely in the standard how the relevant stakeholders have to be identified and approached.

1: We are significantly alarmed at the level of stakeholder consultation being proposed! A significant part of the concern is that we are aware of “stakeholders” who are already actively implementing efforts to obstruct the development of this business based on false and misleading evidence. It is easy to see a scenario where such confusion is infused into a consultation process as to make it difficult to reach any kind of conclusion. Also, scale is an issue here. If a government is seeking FSC certification of all government lands, it seems reasonable that a process like this might be implemented probably spanning a year or two before reaching resolution. Applying the same standard to an SBE for a single pellet plant seems beyond the intended scope of FSC-STD-20-006 (V3-0) EN. It also seems that the intrusion into private and proprietary information is significant for American culture. Perhaps this is one of the reasons FSC has found little acceptance in the US. We submit that this would be a significant barrier to the acceptance of the SBP standard by US pellet plants.
4: Whatever minimal information is released following the audit should be discussed carefully between the auditor and the producer – it should be a cooperative process so that producers have control of information and accuracy of that information.

7: The concern here is any requirement to a BP to have a consultation that could create a “tool” by which a political or social agenda driven entity could stall an otherwise sustainable and low risk opportunity to create, expand, or continue a wood pellet manufacturing operation.

9: Stakeholder consultation could occur during the SBE. We supplied our FSC auditor with a number of contacts and he selected from this group and conducted the consultation.

17: If SBP is to become a biomass certification standard then yes, public engagement as is done through FSC and SFI is appropriate. Also, I would strongly suggest that additional public engagement be conducted by the SBP in 2014-2015 as the standard is developed to ensure that stakeholders have sufficient opportunity to “kick the tires” and voice their opinions. NGOs in the US are keen to identify “principles” for biodiversity conservation during biomass sourcing and the Pinchot Institute is well positioned to convene these stakeholders in this manner for the SBP to interface with them appropriately. I would be happy to discuss this further.

6:

1. It is important to note that the FSC process for stakeholder consultation referenced in the SBP related to controlled wood only requires public consultation for those indicators which are found to be not low risk. The certification body maintains a summary of the risk assessment which is available to the public upon request. As not time is the entire risk assessment posted for any public entity to access and review.

2. The SBP standard currently requires open stakeholder consultation for the entire SBE, which is above and beyond what FSC requires. We would prefer a process either more in line with the FSC process, and/or one that recognizes targeted stakeholder consultation. Meaning, for those indicators we can’t deem low risk, we can reach out to those experts in that area and work with them directly to address the indicator. It will take a lot of time and resources to manage an open process where the entire SBE is up for grabs, especially if the majority of the supply base can be deemed low risk.

3: Biomass Producers should be afforded significant discretion in the selection of stakeholders.

12: I would suggest that here in Ontario where we have a legal requirement on crown land to prepare a forest management plan with multiple public stakeholder sessions, separate first nations consultations and public stakeholders as part of the forest management planning system, no additional stakeholder consultation is required.
23: Obviously, as FSC we find our own approach appropriate. [It] Has been developed over 20 years in a balanced multi-stakeholder process whereby all relevant interests were involved.

24:
1. The FSC Stakeholder consultation principles referenced in the principle are a good basis for how Stakeholder consultation should be performed.
2. We propose that it should be stipulated that the stakeholder consultation should at least take the form of stakeholder communications usually performed by the organisation (i.e. website, social media, email, postal communications) with minimum standards defined by SBP (such as displayed on the organisation’s public website, and in areas local to harvest sites), similar to the requirements for displaying the Summary of Findings in section 15 of standard #2.
3. Doing so would help to ensure a minimum level of consistency in how an organisation broadcasts its stakeholder consultation stage, thereby reducing the risk of consultation being limited only to those stakeholders who are likely to have a positive view of the organisation.

25: We would recommend an FSC equivalent approach to stakeholder consultation.

12
14: The SVP procedure definitely needs more explanations to really explain how it can be done in practice.

7: Sounds reasonable. The “devil is in the details.” I am confident this process is possible. My concern is the “scope” which will determine the duration and resources required in meeting the intent of the evaluation.

25: Site visits should be a requirement of the SBE in general. This is even more critical in an SVP – where risk is uncertain. We recommend a higher level of field sampling for an SVP.

13
7: Reasonable approach

13: Line 196 - Standard #2 indicates "Where an Indicator is scored as Unspecified Risk, Mitigation Measures must be taken to reduce the risk level to Low Risk." However, the Key Concepts document indicates "For any indicator which is scored as Specified Risk the pellet mill must put in place mitigation measures to manage the identified risk so that it can be considered controlled and hence as low risk." Consequently, the relationship between Unspecified Risk, Specified Risk, and mitigation measures may be more clearly defined.

25: We have serious concerns with delegation of monitoring the effectiveness of mitigation measures to the biomass producer. Not only do they have a conflict of interest, but they may, in fact, lack necessary qualifications for the selection/monitoring of adequate measures that will be necessary for insuring a “low risk” outcome.
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| 14 | 14:  
   | 1. The re-certification audit happens at 5 years interval. Surveillance audits are briefly mentioned in standard 3, but we don’t know how often they are organized and what is the scope.  
   |   We suggest that the surveillance audit will be on yearly basis and will cover at least:  
   |   a. verification of energy/GHG data (including any change in the installation or the process)  
   |   b. check that the supply base has not changed (in a way that would imply the need to re-assess the criteria)  
   |   c. COC (unless covered by FSC-PEFC certification)  
   |   Somehow the GHG data should be updated on yearly basis and verified (if not on yearly basis) at least every second year.  
   | 2. It should also be clearly be defined what is considered a change of supply base, triggering re-assessment. It should be unambiguous when a processing unit needs to be re-assess or not.  
   | 7: 5 years is reasonable. |
| 9: | What is the definition of a significant change, and what process is to be followed if this occurs? |
| 25: | Requirements should be in place to insure SBP is notified by the Biomass Producer in a timely fashion (time period should be defined by SBP – e.g. 30 days) of any changes that are likely to affect the SBE. |
| 15 | **Specific question:** What level of publically accessible information (including SBE and CB audit report) would you expect / find acceptable? Would it be similar to the approach taken by FSC or PEFC or can you suggest another approach? |
| 5: | I do not think that the report should be available on our own website. |
| 7: | Certainly SBP will be fully informed, but speaking to the degree of information published on-line for the general public… FSC indicates status of certification, dates of expiration and completion, etc. and a copy of the FSC Risk Assessment. A similar SBP web posting would be acceptable to include the Summary of Findings. It will be important for the BP to review any summary before posting to ensure only general information is provided to the public. I’m sure it will. |
| 9: | We are comfortable with the level of detail provided by FSC, however, proprietary information must remain confidential. |
| 17: | Yes. Publicly available audit reports are the standard by which the SBP should proceed. |
| 6: | Same as FSC should be the standard – as described above [in response to question 11]. |
3: Confidential and sensitive information should not be provided and a high level summary of audit findings should be sufficient.

12: Here in Ontario, all crown land forest management documentation is public information and available via the internet.

23: A transparent approach (i.e. FSC database).

24: As an assurance provider, we welcome as much publically accessible information as possible in order to enhance the transparency of the process and its results. The approach taken in displaying the results of FSC Controlled Wood Risk Assessments is an example of good practice in this regard.

25: We would recommend an approach consistent with FSC requirements.

16

| 9: | Detailed SBE information (material volume, number of suppliers, customer names, etc.) should not be made available publicly. |
| 25: | The list of “options” to support the credibility of the SBE process must be normative. |

17

| 7: | It is appreciated that the line “…for any that are justified” was part of the paragraph. |
| 25: | The Biomass Producer should be required to report substantiated comments/complaints to the SBP. The SBP should have normative requirements in place for handling this and be responsible for ensuring Biomass Producers adhere to those requirements. |

**STANDARD #3: Certification Systems. Requirements for Certification**

<table>
<thead>
<tr>
<th>Section #</th>
<th>Comments and justification for proposed amendments</th>
</tr>
</thead>
<tbody>
<tr>
<td>General comments</td>
<td>12: Here in Ontario on crown forest lands where forest management occurs – 57.5 million hectares – the forest management system and all documentation is public with information available via the internet. I would suggest that no additional certification process is needed even if the crown forest unit is not FSC/PEFC certified.</td>
</tr>
<tr>
<td></td>
<td>23: Our comments on Standard 3 are based on an assessment of what would be required to ensure adequate quality control of risk assessments and possible mitigation actions.</td>
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<td><strong>1</strong></td>
<td>25: Based upon the deficiencies noted elsewhere in the comments on various sections of the draft standards, the SBP will be unable to provide adequate assurance that solid biomass used for sustainable energy production by its member organizations is compliant with regulations on sustainability and biomass legality in EU countries, and certainly not exemplar of good practice.</td>
</tr>
<tr>
<td><strong>2</strong></td>
<td>7: Reference to the Sustainable Forestry Initiative (SFI) should be part of approved schemes. Not having SFI listed leaves doubt. It may just be an unintended omission by the writer because reference is made later in this standard. 18: The initial implementation phase will be important in evaluating the need for additional guidance to ensure good implementation. We expect an open stakeholder consultation process during revision of the standards.</td>
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<td><strong>3</strong></td>
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<td><strong>4</strong></td>
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| **5** | 14:  
1. We are unsure about the requirement to work with FSC/PEFC accreditation. Another option would be to work under accreditation of RED-recognised schemes. Both forestry and bi-energy/GHG competencies are needed.  
2. Whatever the accreditation required, it is understood that SBP does not plan to have its own specific accreditation. Hence we recommend having at least an additional approval mechanism (the FSC/PEFC and/or RED accreditation being a starting point, but specific competencies and quality system to deal with SBP requirements is essential. Otherwise anyone with FSC/PEFC accreditation would perform SBP certifications and there will be no way to make sure they make a good job as this activity does not fall under the scope of the accreditation and hence, will not be controlled by ASI. An approval process from standard owner is strongly recommended. At least the CBs must send evidence that they implemented SOPs for SBP audits and certification.  
3. Requesting FSC/PEFC “forest management” accreditation for SBE might be unnecessary as the assessment of forestry unit is never involved in SBP. Assessing a risk based approach for controlled wood/due diligence is typically part of the COC scope of accreditation and is very similar to the approach SBP has been developing. Auditors qualified for the scope forest management might be overqualified for the purpose of SBP, resulting in limited availability and increased costs.  
4. Requirements for auditors are not clearly stated. Especially the requirements for “GHG auditors” must be laid down.  
15: We recommend a modification to Section 5, to recognize those organizations that accredit the certification bodies that provide audits to the SFI Standard, including the American National Standards Institute (ANSI) and the ANSI-ASQ National Accreditation Board (ANAB). |

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23:
1. All the CBs must comply with the requirements of ISO 17065:2012 (which is the last version of ISO Guide 65 for product certification) or ISO17021:2011 (management system certification). Although these standards seem in line with FSC, using the word “OR” instead of “AND” represent a flaw of SBP’s system. These two ISO standards, although regulating similar issues, are different (one regulating certified products, the other systems).
2. It is unclear how SBP’s requirements will be assessed by the Accreditors for certified material (i.e. ASI is not obliged or trained to check CBs auditing GHG emissions under SBP’s requirements).
3. It is unclear how the Accreditation System would work for non – certified material (i.e. the use of FSC guidelines is insufficient to guarantee a third party accreditation system, as ASI would not control CBs assessing non – certified companies).

24:
1. Section 5 currently only allows for FSC and PEFC accredited service providers to perform SBP certification.
2. Ofgem, a government organisation which is responsible for the operation of the Renewables Obligation Order scheme for biomass electricity generation in the UK, currently requires that generators’ annual sustainability reporting should be assured to the requirements of ISAE (International Standard for Assurance Engagements) 3000. Assurance of this type can only currently be performed by member firms of the International Federation of Accountants (who are obligated to standards regarding education, quality control and ethics, amongst others).
3. As a result of the strong alignment between the requirements of the SBP standards and those of Ofgem’s requirements for reporting, there are currently a number of professional services firms operating in the space who, although not being accredited to perform FSC or PEFC certification, are sufficiently experienced and qualified to provide credible assurance that there is no major failure in a Biomass Producer’s conformity with the requirements of the applicable SBP Standard(s).
4. Consequently, we propose that professional services firms who are experienced in the provision of ISAE 3000 assurance over Renewables Obligation Order reporting should also be considered as being sufficiently qualified to act as an SBP certification body.

25: While the accreditation requirements themselves are adequate – they do not compensate for the weaknesses inherent in the RA, the SBE, the SVP, the Energy and Carbon Balance Calculation and CoC.
7

24: Lines 77, 79, 86 and 87 state that “in order to provide such an assurance, the Certification Body shall:
   a. Analyse and describe any and all of the following that apply to the organization:
      - The organization’s risk scoring of each criterion at both Risk Assessment and Supplier Validation Program stages”
   b. We propose that this section should be amended in order to clarify that a Certification Body should also assess the appropriateness, in light of testing performed and evidence obtained, of the risk scoring presented by the Biomass Producer.

2. Lines 91-93 state that the Certification body should also: “Confirm that there is a management system in place that is capable of ensuring that all the requirements of the standards are implemented across the entire scope of the evaluation”
   a. As discussed in our comments in Standard #1 section 3.1, we propose that, where the management system includes the use of an IT system, further requirements should be introduced such that the Certification Body is comfortable that the IT system (and any reports it produces or calculations it performs) is accurate, reliable and suitable to the current and future scale of operations.

25: It is unclear what sampling methodology should be employed by the certifiers. Since the RA and the SBE are sample-based, the certifier will be validating a sample of a sample – which introduces a large margin of potential error in the results. Annual audits should be required.

8

5: Is the public consultation process in Standard 2 separate from the Stakeholder Consultation here? If not then it needs to be made clear in Standard 2 that the CB can be the one performing the Stakeholder Consultation.

6: CBs should not be notifying stakeholders of audits and asking them for feedback. If a CB feels they need to discuss the SBE process with stakeholders involved, the BP should give the CB a list of stakeholders who participated in the process, and if they can be contacted, the CB can contact them directly to interview them. The way this section is currently written it opens the door to restart the whole SBE process over again and gives too much access to stakeholders in the certification process. Stakeholder consultation during an audit is not intended to source new information for the SBE but to verify the company followed the process as outlined in the SBE.

23:
   1. Clearly include vulnerable and affected groups
   2. The consultation is open only to stakeholders identified by CBs, it should be open to everybody.
   3. The Certificate holder should also be involved and be responsive to stakeholders’ inputs, this is not explicit.
   4. The document uses the wording "Sources of information may include interview with stakeholders” for Illegal harvesting; compliance with forest laws; anti-corruption measures; violation of traditional rights; conversion rules. But "may" is too weak and this involvement is not about all the standard.

24:
1. Lines 101-102 state “at the main assessment and at the five-yearly re-assessment” though Standard #4 (section 7.8 line 255) refers to an “annual audit” of Chain of Custody requirements.
   a. Please could you clarify the frequency of third party assessments for SBP certification?
   b. We propose that assessments (or interim re-assessments) should be performed on an at-least annual basis.

24:
1. Lines 124-125 state “where a certificate is issued, the Certification Body shall make available a public summary of its assessment of the organization’s SBE”.
   a. We propose that the Certification Body should also make available a public summary of its assessment where it declines to issue a certificate, or where a certificate is withdrawn, in order to increase the level of transparency to organizations which purchase from that Biomass Producer.

### STANDARD #4: Chain-of-Custody Standard

<table>
<thead>
<tr>
<th>Section #</th>
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<tbody>
<tr>
<td>General comments</td>
<td>14: There should be a description of the arrangements to forward the GHG data from one step of the supply chain to the other so that the end user can get the information he needs. This is an essential component of the certification scheme (actually, if SBP is to be used in Flanders, it is the main idea there: the end user needs certified figures for the energy balance).</td>
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<tr>
<td></td>
<td>15: As noted under our General Comments, feedstock (both primary and secondary) with SFI CoC should be accepted.</td>
</tr>
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<td>17: You should expect push back on excluding SFI on the exclusion of their COC standard and their Fiber Sourcing program.</td>
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<td>3: We are surprised that SFI CoC is excluded from SBP Approved Chain of Custody Schemes and are unaware of any reason for its exclusion. SFI CoC requires those who use it to also use SFI Fiber Sourcing (see earlier comments regarding SFI Fiber Sourcing) and it is a credible CoC system, is widely used and accepted and delivers assurance similar to that provided by FSC and PEFC CoC. If SFI CoC’s exclusion is due to a lack of endorsement by PEFC SBP should be aware that SFI has never sought PEFC endorsement of its CoC. We believe that SBP should examine SFI CoC on its own merits and we believe such an examination would result in SFI CoC being included as an SBP Approved Chain of Custody Scheme.</td>
</tr>
<tr>
<td>1</td>
<td>1: Plum Creek is a program participant of SFI and would like the SBP to consider SFI’s comments also as our own by this reference.</td>
</tr>
</tbody>
</table>
17: While the SFI Fiber Sourcing program does not qualify under the consultation draft of the SBP framework it may be used to help pellet mills during their risk assessments. For instance, if a pellet mill has a robust program of logger training they have developed through Fiber Sourcing and this training directly identifies the SBP criteria and indicators in the SBF SFS then this documented use of such a training program could potentially help demonstrate sufficient evidence that the SFS criteria are considered and risks at least partially mitigated. Perhaps, Fiber Sourcing could be used to help identify areas of specified risk and practices to minimize those risks. Modifications of the SFI program may also be an option. The participants of a recent workshop on the Transatlantic Trade in Wood For Energy suggested several constructive ideas: Pinchot.org/pellets.

23: Line 15: Scope: “The starting point for the SBP CoC is the forest Supply base”. But the biomass producers are not required to have a CoC certificate (see Line 200). So potential frauds with the origin of biomass will not be controlled [in certain circumstances it could become interesting to increase the supply with biomass coming from other foresters outside the region that was risk assessed]. Also the sawmills providing secondary compliant feedstock do not seem to be required to have a CoC system. This could further extend the risk of frauds.

---

2

18: The standard states that SPB biomass cannot have been physically mixed with material without EU TR legality demonstrated. We believe it at least should be SBP-compliant for mixing to be allowed.

23:

1. Line 15 - Scope: “The starting point for the SBP CoC is the forest Supply base”. But the biomass producers are not required to have a CoC certificate (see Line 200). So potential frauds with the origin of biomass will not be controlled (in certain circumstances it could become interesting to increase the supply with biomass coming from other foresters outside the region that was risk assessed). Also the sawmills providing secondary compliant feedstock do not seem to be required to have a CoC system. This could further extend the risk of frauds. [NB: These comments in Sounding Board notes only, not in FSC’s formal submission]

2. Line 142 and following: Mixing opportunities: as we have mentioned, we are of the opinion that your requirements for “secondary feedstock” already reduces that to “controlled feedstock”. So that should be included in the 30% maximum. If one should allow mixing at all (see next point).

3

23: Line 148 and 153: “100% SBP Biomass” is a misleading label. It assumes that 100% can be regarded as complying with the requirements for government support. However, it can include 30% controlled feedstock and an unlimited amount of secondary compliant feedstock that is not controlled against sustainability criteria and therewith also can have a doubtful carbon balance impact in the forest.

4

4: Our comments on the definitions from above standards also apply here.
3: We are surprised that SFI CoC is excluded from SBP Approved Chain of Custody Schemes and are unaware of any reason for its exclusion. SFI CoC requires those who use it to also use SFI Fiber Sourcing (see earlier comments regarding SFI Fiber Sourcing) and it is a credible CoC system, is widely used and accepted and delivers assurance similar to that provided by FSC and PEFC CoC. If SFI CoC’s exclusion is due to a lack of endorsement by PEFC SBP should be aware that SFI has never sought PEFC endorsement of its CoC. We believe that SBP should examine SFI CoC on its own merits and we believe such an examination would result in SFI CoC being included as an SBP Approved Chain of Custody Scheme.

13:
1. Line 35 - The definition of Chain of Custody would be significantly strengthened and more clear if it included language regarding the legal ownership of material.
2. Line 37 – remove the word “would”.
3. Line 39 – The Controlled Feedstock definition is unclear.
4. Line 40 – 42 (last sentence) - This level of detail doesn’t belong in a definition.
5. Line 43 - This is commonly referred to as a Primary Processor. Definition is not constrained to wood.
6. Line 57 - What is the difference between an "SBP claim" as specified in SBP Biomass Products Groups b) and an "SBP Sustainable Biomass credit" as specified in c)? If they are the same, then it would be more clear if the same terminology was used in both b) and c). If they are different, then a distinction between the two should be made.
7. Line 71 – 72 - Re SBP Approved Controlled Feedstock System: It is not clear why material supplied with other FSC or PEFC claims (vs. only an "FSC Controlled Wood" or "PEFC Controlled Sources") would not constitute an eligible input to SBP compliant Secondary Feedstock.
9. Line 78 – 79 It is not clear what constitutes "an appropriate verification process”.
10. Line 80 – Re Post consumer Tertiary Feedstock: For BPs that implement both systems?
11. Line 85 - 86 - Re “FSC-STD-40-007 (Version 2-0) EN applies.” It is not clear how this application is rendered.
12. Line 89 - “Second-step wood processor” should read Secondary Processors.

23: Line 151-153: not understandable why there is no limit set to the inclusion of controlled secondary feedstock. FSC is of the opinion that secondary feedstock has a direct link with forests, cannot be considered as waste. This is confirmed by the EU waste legislation and EUTR

25: The limitation in required criteria for Controlled Feedstock (Table 1) is problematic given it could encompass up to 30% of the total volume. It is essentially limited to legal requirements (with two exceptions).

5: 1.1 – Knowing the supply chain all the way back to the forest source is not possible for all feedstocks.

### 6

1. “Organisations” should have a capital letter throughout this section.
2. Line 118 - If section 7 is required for both options A and B then it should be made a prerequisite.

### 7

7: Line 182 – requiring tree species name could be problematic. For example: Fram produces pellets in one of its locations that is 70% hardwood species and 30% pine. For the pine, there are only 2 species. For the hardwood component there are 20+ species and they are always changing. Keeping up with their mixture is almost impossible. It is always changing but tends to hold if reporting an annual average. Suggestion: refer to hardwood as a generic name “mixed US southeast hardwoods” These are all native hardwood species to which none are on the CITIES list. I understand the intent, but this level of detail to be carried on the SBP registry may be overkill. Actual species names can be kept with each facility and SBE if information is needed. The US, unlike Eucalyptus or Radiata plantations around the world, has sustainable biodiverse managed plantation forests.

18: We find the use of a credit system too unambiguous because it only create limited incentives to the forest holder to change management practices. It will also make it impossible to trace pellets back to the supply base.

12: Section 7 is somewhat circular -- section 7.1 points to section 7 and 9 but in reality it likely ought to point to 7.4 through to 7.10.

13:

1. 7.1 This is self referencing.
2. Line 131 - Do BPs need to be FSC or PEFC certified?
3. Line 135 – remove “is”. Change “smaller” to ‘less’.
4. Line 140 - It is not clear if the percentage of Controlled Primary Feedstock may be up to 30% or less than 30%.
5. Line 144 – 149 - It is not clear if the percentage of Controlled Primary Feedstock may be up to 30% or less than 30%.
6. Line 151 – 153 - This could use an illustration. Also, when it says ”SBP Primary Feedstock”, shouldn’t it say ”SBP-compliant feedstock”? Also, according to the Key Concepts document, ”there is no Controlled Secondary feedstock product group.”
7. Line 160 – 161 - Does this mean their [FSC] CW pellets?
8. Line 162 – Change “parties” to ‘Organizations’.
9. Line 181 – 184 - Should this also include the product group?
10. Line 186 - “Date of receipt and amount” of each supply?
11. Line 187 – ”Date of registration” of what?
12. Line 200 –
   a. Change “do not” to ‘shall not’ or ‘cannot’.
   b. Remove “and the”.
13. Line 222 – 223 - It is not clear what constitutes "an appropriate verification process".
15. Line 235 – “Suppliers of Biomass Material” Isn’t this a Biomass Producer? Supplier of Biomass Material is not in the list of terms and definitions.
17. Line 245 – 246 – “SBP Sustainable Biomass Claim” What becomes of the claim if the material is mixed with EUTR compliant biomass?
18. Line 261 – 262 - This clause is not auditable.
19. Line 263 - Define organization.

Unattributed comments in the Sounding Board document:
1. [Re 7.2:]
   a. (142) Note: If the credit system is used then more than 30% of the feedstock may be controlled primary feedstock, but then less than 100% of the output will be SBP certified. If the percentage method is used then the maximum percentage of primary controlled feedstock permitted is 30%. At the BP, SBP-certified Biomass may contain up to 30% Controlled Primary Feedstock following Mass Balance rules:
   b. (148) X % SBP-compliant feedstock + Y % Controlled Primary Feedstock = 100 % SBP Biomass as long as Y is smaller than 30%. If Y is larger than 30% then the amount of SBP Biomass is X% / 0, 7. The amount of Controlled Biomass is 1 – X% / 0, 7.
   c. (151) At the BP, SBP-certified Biomass may contain any amount of processing residues from controlled sources:
   d. (153) X % SBP Primary Feedstock + Y % Controlled Secondary Feedstock = 100% SBP Biomass.

25:
1. 7.2 refers to an example that includes “Controlled Secondary Feedstock”. According to Pg. 8 in the “key Concepts” document there is no such category.
2. 7.4. Is independent on-site verification by an auditor required to insure EUTR compliance? If not, this is a serious deficiency.
3. 7.5. The status of the material (SBP Sustainable Biomass certified material, non SBP certified material) should be included in the list of information for incoming material. The document only includes this requirement in outgoing material.
4. 7.7. Actual percentages of SBP certified material should be required in the claim.
5. Can organizations mix certified and uncertified materials together? What claims can organizations make and who monitors these claims?

[NB: comments in Sounding Board document only]
1. Line 142 and following: Mixing opportunities: as we have mentioned, we are of the opinion that your requirements for “secondary feedstock” already reduces that to “controlled feedstock”. So that should be included in the 30% maximum. If one should allow mixing at all (see next point).
2. Line 148 and 153: “100% SBP Biomass” is a misleading label. It assumes that 100% can be regarded as complying with the requirements for government support. However, it can include 30% controlled feedstock and an unlimited amount of secondary compliant feedstock that is not controlled against sustainability criteria and therewith also can have a doubtful carbon balance impact in the forest.
3. Line 151-153: not understandable why there is no limit set to the inclusion of controlled secondary feedstock. FSC is of the opinion that secondary feedstock has a direct link with forests, cannot be considered as waste. This is confirmed by the EU waste legislation and EUTR

8

13: 
1. Line 275 - Operators, Organizations and Biomass Producers are all the same?
2. Line 281 – 282 - Redundant with lines 269 and 270.

9

18: We predict guidelines will be needed for implementing option B as the requirements don’t provide much certainty on how the CoC should be structured or implemented.

13: Line 299 - Is there a definition for "Chain of custody method"?

**STANDARD #5: Standard for the Collection of Data with the Purpose of Energy and Carbon Balance Calculation**

**Introduction**

**Comments and justification for proposed amendments**

5: It appears that there still needs to be quite a bit of work done on this standard in order to make it clear to users how these items will assessed and what data us required. I think the theory behind it as presented originally by Yves is quite good though.

9: 
1. We recommend that a basic (very simple) carbon calculation worksheet be provided for data entry submission and calculation of results for the Biomass Producer portion of the supply chain. We recognize that the final figures for the total supply chain will vary as each power plant will have its own figures to apply.
2. It should be clarified that the 12 month Reporting Period is based on the commercial operation date of the facility and not the date of first pellet production.
1. Is the SBP going to participate in the upcoming biogenic carbon accounting meeting put on by IEA in Copenhagen in May. I will be there.
2. I think a statement in Standard 5 that explains the linkages to other standards (i.e. the COC standard) is important especially as it pertains to input materials for wood pellet production. There is an ongoing debate in the US with regards to the practicality of tracking feedstock type (primary residues, roundwood, chips, etc.) for input into GHG accounting calculations.

12:
1. With respect to standard #5, default values ought to be nation based rather than a single default value for all nations.
   a. Suggestion – have specific national defaults as opposed to one default value set for everyone; page 2 line 30 states a max period of 15 days for reporting, what if the appropriate information is not supplied – eg natural gas consumption - in that 15 day period to report on the reference period?
2. Page 3 the example appears to be contradictory – reference year is calendar year 2013: 20 Dec 2012 to 20 Dec 2013 is acceptable; 12 Dec 2012 to 12 Dec 2013 is not acceptable; 12 Jan 2013 to 12 Jan 2014 is acceptable
3. Standard #4 information is made publicly available and gets submitted to SBP, where does standard #5 information go? If all of the information is made public, I will be able to determine costs within a small variance, is this not making certain business information regarding the production of wood pellets publicly available in relation to confidential business financial data?

16:
1. There is no mention of previous uses of the forest, the data of change of forest management practice or anything that would enable the calculation of solid carbon or other previous carbon stock to be assessed. Thus there is no way to address concerns of carbon debt: both emission on change and continuing foregone sequestration.
2. Since these issues should have a small effect when forestry practices are responsible and sustainable, it is imperative that this can be demonstrated numerically. Otherwise the forestry community has no solid evidence to address these concerns from the public.
3. This is a very significant missed opportunity in the SBP which should be rectified.
4. PEFC cannot address these issues as it adopts other standards and cannot easily initiate new methods.
5. FSC is, quite rightly, more concerned with bringing the large amount of uncertified forestry into some kind of certification rather than on extending and enhancing the details of its own methods. So FSC carbon accounting standards cannot be expected to be available in any useful time-frame.
6. This is particularly important and urgent in Europe because of the two recent reports by the European Environment Agency and the Joint Research Centre of the European Commission.

20:
1. ‘Standard 5’ of the BAF requires the collection of data and monitoring of the energy use and greenhouse gas (GHG) emissions throughout the supply chain in order to provide information to the energy generators. The requirements of the standard show only very limited knowledge of the full carbon balance of the pellets, since it doesn’t require any monitoring of carbon stock changes in the forests, where harvesting has taken place. The changes in these carbon stocks are an order of magnitude more significant than the emissions during the supply chain. The standard also sets only criteria for the GHG emissions, not even for the supply chain. It therefore gives no assurances of positive climate impacts, but only (partly) monitors them.

2. Neither standard 1 nor 5 make an effort to minimize the ‘carbon debt’ created when wood is burned directly for energy.

23: We have not reviewed in detail Standard 5 yet. However we do note that it does not contain a target for greenhouse gas reductions compared to the fossil fuel the pellets are to replace. This could be important in particular where national rules do not set such targets or are considered by stakeholders as insufficient. Moreover, we miss in the methodology the consideration of the “carbon debt” that arises when biomass is used that has grown over a number of years and/or when there is no guarantee of complete restoration of the biomass harvested.

25:

1. Default values (Tier 1) are not provided in the draft for consultation. Where are these made available, and shouldn’t they be included in the consultation?
2. A Regional approach to feedstock data ignores the most significant factors in how bioenergy producers actually affect carbon emissions: the biomass feedstocks they choose and how the lands from which this biomass is sourced are managed.
3. Instead, a source’s biogenic carbon impact is determined by factors outside its control, from weather to the economy to the land use decisions of scores of independent entities.
4. This will not only produce arbitrary results, but invites widespread free-riding and abuse.
5. A plant that burns whole trees from a given region would have a low or zero carbon value as long as total tree harvesting in the region does not exceed annual forest growth.
6. In other words, plants could continue to burn biomass until a region’s forest sink is completely eliminated, and that energy production would still be considered carbon low/free. Yet eliminating a carbon sink has the same impact on atmospheric carbon as the creation of an equivalent-sized smokestack.
7. The proposed regional approach also could include non-managed and even restricted lands in its baseline. This means a bioenergy facility could “free ride” off of the carbon storage on non-working lands, masking its own biogenic carbon emissions.

1 Input materials for wood pellet production

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</tr>
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</table>

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1.1

5: 1.1.6 – what is the minimum tier and can we also use academic literature as a tier 2?
2. 1.1.7 – what is the minimum tier and can we also use academic literature as a tier 2?

14: 1.1.6– suggested rephrasing for tier 1:
Tier 1: Fertilizer is rarely used in forestry, except in short rotation systems and intensive plantations. In traditional forestry, the default will be 0. In short rotation systems and plantations, the values from Biograce can be used.

9: 1.1.4 Forest Products: The requirement to measure moisture content for each delivery (truck) of non-round wood for Tier 3B is not practical nor does it always provide meaningful data. Tier 3A is more practical, however it also has limitations and the results can be misleading because the residuals have the potential to lose a considerable amount of moisture while in storage prior to processing. The requirement to measure round wood immediately after debarking and chipping can be misleading for the same reason. We have large moving floor storage bins and chipped material can sometimes remain in storage for extended periods of time. Occasional measurement (approximate average value) of chips prior to drying would provide a more accurate means of assessing the amount energy required to remove a specific amount of moisture.

25:
1. Wood harvested from short rotation systems have a different carbon profile than trees harvested – or thinned – from a natural forest. Trees in short rotation systems (e.g., willow and polar) typically are harvested on a 7-14 year rotation, are fertilized and grow more rapidly (and therefore recover carbon more quickly) than trees in natural systems. Short-rotation feedstocks should be in a separate category.
2. No reference is provided for Biograce for review.

1.2

4: The definition of “forest residues” in this document is not consistent with other schemes. Pre-commercial thinnings should be considered “forest residues” as they are a by-product of the production of primary forest materials and are removed to direct more of the forests’ growth into long-lived materials, such as lumber and poles that act as carbon sinks.

9: 1.2.4 Forest Residues: The requirement to measure moisture content for each delivery (truck) of non-round wood for Tier 3B is not practical nor does it always provide meaningful data. Tier 3A is more practical, however it also has limitations and the results can be misleading because the residuals have the potential to lose a considerable amount of moisture while in storage prior to processing. The requirement to measure round wood immediately after debarking and chipping can be misleading for the same reason. We have large moving floor storage bins and chipped material can sometimes remain in storage for extended periods of time. Occasional measurement (approximate average value) of chips prior to drying would provide a more accurate means of assessing the amount energy required to remove a specific amount of moisture.

25:
1. Recent peer reviewed science has concluded that utilization of whole trees – including low quality wood – emits more carbon than utilization of true residues such as slash (tops and limbs) that would be burnt or otherwise decay rapidly in the forest. While there is some variability in results due to differences in climate and forest type, as well as biomass plant conversion efficiency and the carbon density of displaced fossil fuels, studies conducted in different regions of the U.S. have found that burning whole trees in conventional, standalone power plants increases carbon emissions relative to fossil fuels for 35 to 100 years or more. These studies are part of a growing body of science on the lifecycle impacts of biomass that points to the need to distinguish amongst types of biomass and take into account soil carbon impacts of biomass harvesting. A study by Dartmouth College published this year suggests that current estimates of carbon impacts may actually understate the problem because disturbances created by logging may result in far more rapid and extensive transfer of carbon from the forest mineral soil to the atmosphere than previously thought.

2. Inclusion of low quality wood in the same category as residues such as tops and limbs, will lead to inaccurate, misleading results in the SBP carbon balance calculation.

1.3 Sawmill or Woodworking Residues: The requirement to measure moisture content for each delivery (truck) of non-round wood for Tier 3B is not practical nor does it always provide meaningful data. Tier 3A is more practical, however it also has limitations and the results can be misleading because the residuals have the potential to lose a considerable amount of moisture while in storage prior to processing. Occasional measurement (approximate average value) of chips prior to drying would provide a more accurate means of assessing the amount energy required to remove a specific amount of moisture.

2 Production of wood pellets

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<td>9: See comments above related to 1.1.4, 1.2.4 &amp; 1.3.4.</td>
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<td>25: Moisture content of the material entering the pellet production stage is an important determinate of energy use. This should be compulsory information.</td>
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2.5 | 9: It should be clarified that a facility is considered “new” until such time as commissioning is complete.

2.6 | 5: Will we need to assess the GHG impact per kWh of electricity?

7: If we are calculating a carbon balance, does it matter where the electric power came from? In GGL GHG calculations, an assumed array of power sources are provided for US (Hydro, nuclear, natural gas, coal, etc.) Should there be a consideration? Is there a consideration here that isn’t described in this section of SBP documents? It stands to reason that a pellet producer (BP), using electricity from 80% hydro, would be better than a BP using 80% electricity from a coal fired generator.

2.7 | 5: Will we need to assess the GHG impact per unit of diesel used (can be different in different regions)

2.8

2.9 | 9: What factor should be used to convert cubic meters of natural gas to kWh?

2.10

2.11 | 4: This list should include a category for non-forest woody biomass and non-woody biomass, perhaps styled as “E. Non woody and non forest biomass”

2.12 | 5: It is also possible to assess the GHG impact for the wood used in the dryer as an input into the total pellet production process and so the efficiency of the dryer makes no difference and so does not need to be reported (or rather it is already implicitly reported as lower efficiency means a higher demand).

9: The amount of biomass (bark) generated internally during the debarking process is not continuously measured and varies throughout the year based on seasonality, bark removal efficiency, etc. It will be difficult to quantify the actual weight of this material and an estimate might be necessary. We already capture and maintain weight records for external bark purchases.

2.13

2.14
2.16 9: It is not possible to weigh barges thus it might be necessary to utilize barge weights derived from drafting of barges before and after loading is complete.

3 Transportation of wood pellets

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<td>3.4</td>
<td>9: The amount of diesel fuel for river transportation is also available in liters/km.</td>
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<td>3.5</td>
<td>9: This category should be optional for the Producer as some product is sold FOB port.</td>
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4 End-user of wood pellets (power plant) operations

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