



Sustainable Biomass Partnership
Key concepts in the Biomass Assurance Framework (March 2014)



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1 Background

1.1 Purpose

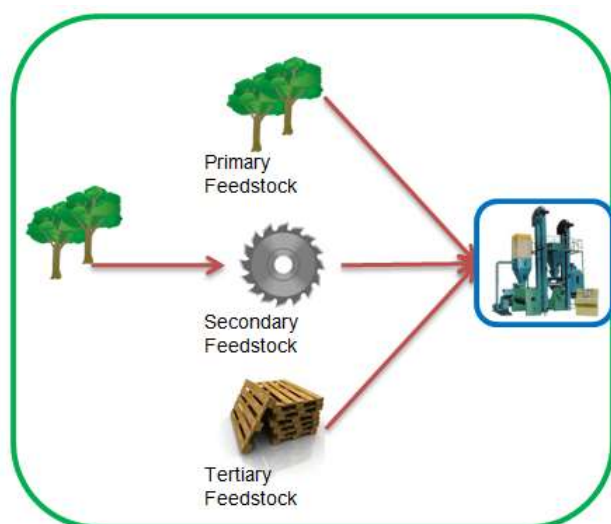
The Sustainable Biomass Partnership (SBP) is currently seeking comments on its draft Biomass Assurance Framework (BAF) through a consultation process. This document provides background to some of the key concepts included in the BAF standards so that it is easier to understand the intention behind the standards and hence to comment on their content.

1.2 The standards

The intention of the standards is to establish a framework in which users of woody solid biomass which are burnt for energy generation can be confident that the biomass came from a legal and sustainable source as well as being able to calculate the energy and carbon used in producing and getting the biomass to the generator. Most of this biomass is likely to be in the form of pellets.

There are five standards.

SBP Standard #1. Sustainable Feedstock Standard (SFS) contains SBP's definition of sustainable and legal as it applies to pellets. This is the standard against which feedstock supplied to a pellet mill must be assessed. Feedstock is material coming into the pellet mill such as small-diameter roundwood, sawdust and wood chips. Biomass is the material leaving the mill. In the standards the pellet mill is referred to as the Biomass Producer.



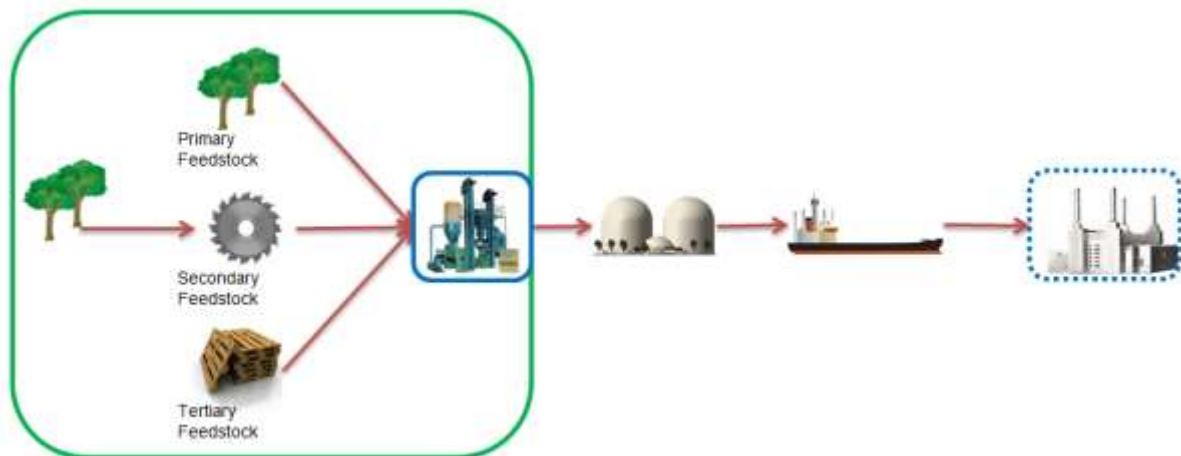
SBP Standard #2. The evaluation of Feedstock against the SFS defines how the evaluation of feedstock against the Sustainable Feedstock Standard should be undertaken. It also defines what material is exempt from a full SFS. The evaluation against the SFS is the responsibility of the pellet mill.

feedstock against the SFS an independent certification body checks that the evaluation undertaken by the pellet mill meets the SBP requirements. The certification systems standard defines how the certification body should do this.

SBP Standard #3. Certification Systems standard. Whilst the pellet mill is responsible for the evaluation of the



SBP Standard #4. Chain of Custody standard. In order to provide confidence that the pellets delivered as sustainable can be linked back to the feedstock that was evaluated against the SFS, the Chain of Custody (COC) standard sets out the systems that need to be put in place and also sets limits relating to how material may be mixed.



The Chain of custody from feedstock to generator.

SBP Standard #5. Energy and Carbon data collection specifies how required data are to be collected and calculated.



2 Feedstock

2.1 SBP and other similar schemes

There are already existing voluntary certification standards and schemes which are similar in their intent and SBP does not seek to compete with these existing schemes. However, it is not currently possible to use only these existing schemes. In some of the key source regions for feedstock there is a lack of input material certified under these voluntary schemes. Additionally, existing schemes do not cover all the requirements of the SBP, for example those relating to energy and carbon data. The SBP has been developed as a solution to the limitations of existing schemes.

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.

2.2 A regional approach

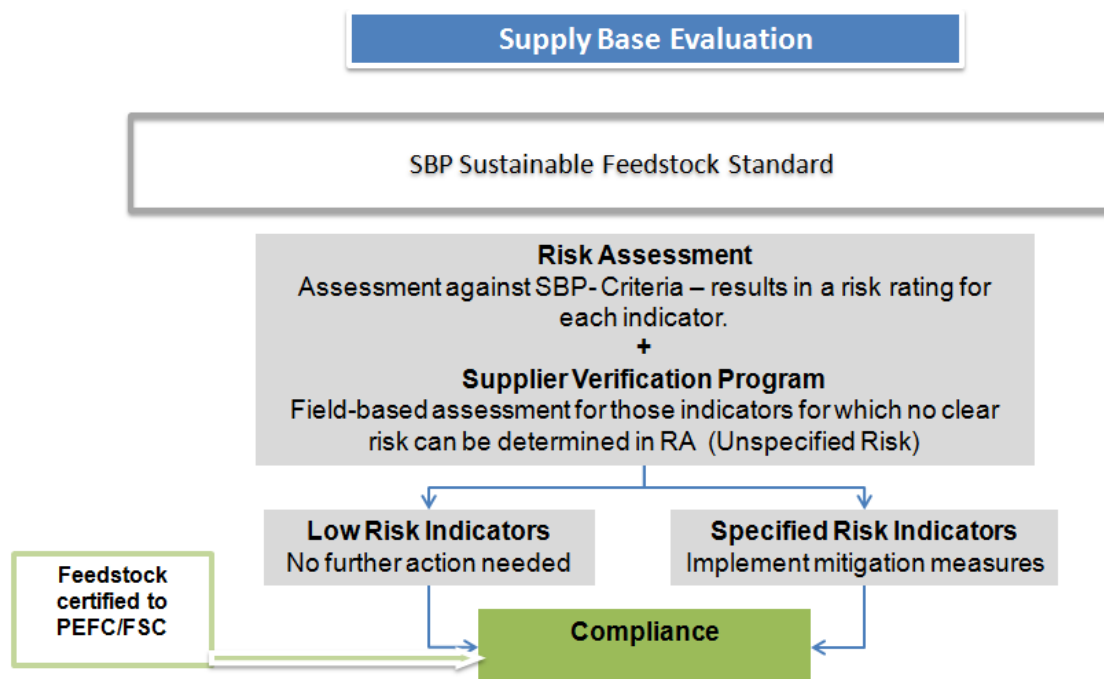
In the SBP framework it is the pellet mill that is the first point in the supply chain to be certified and the forest from which the feedstock is sourced is not certified by SBP. In assessing compliance of feedstock with the Sustainable Feedstock Standard the pellet mill is required to consider the entire region from which it sources its feedstock, which is called its Supply Base. The process of evaluating the feedstock is hence called the Supply Base Evaluation (SBE). The pellet mill is responsible for ensuring that the feedstock it receives meets the requirements of the standard.

2.3 The Supply Base Evaluation (SBE)

Some feedstock is exempt from being evaluated against the Sustainable Feedstock Standard (SFS) and this is discussed in the next section. For feedstock that must be evaluated against the SFS the process for doing this is the Supply Base Evaluation (SBE).

The SBE requires that each indicator in the SFS must be scored as either Low Risk or Specified Risk across the Supply Base. A Risk Assessment (RA) is carried out to identify the risk of compliance for each indicator within the Supply Base. If it is not possible to determine the risk for an indicator during the RA the indicator is scored as Unspecified Risk. If an indicator is determined to be of Unspecified Risk then a Supplier Verification Program (SVP) needs to be undertaken to evaluate in more detail the risk of not complying with the indicator in the Supply Base. At the end of the SVP the risk for each indicator will be scored as either Specified Risk or Low Risk.

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. These mitigation measures have to be monitored.



Flow chart of the Supply Base Evaluation process

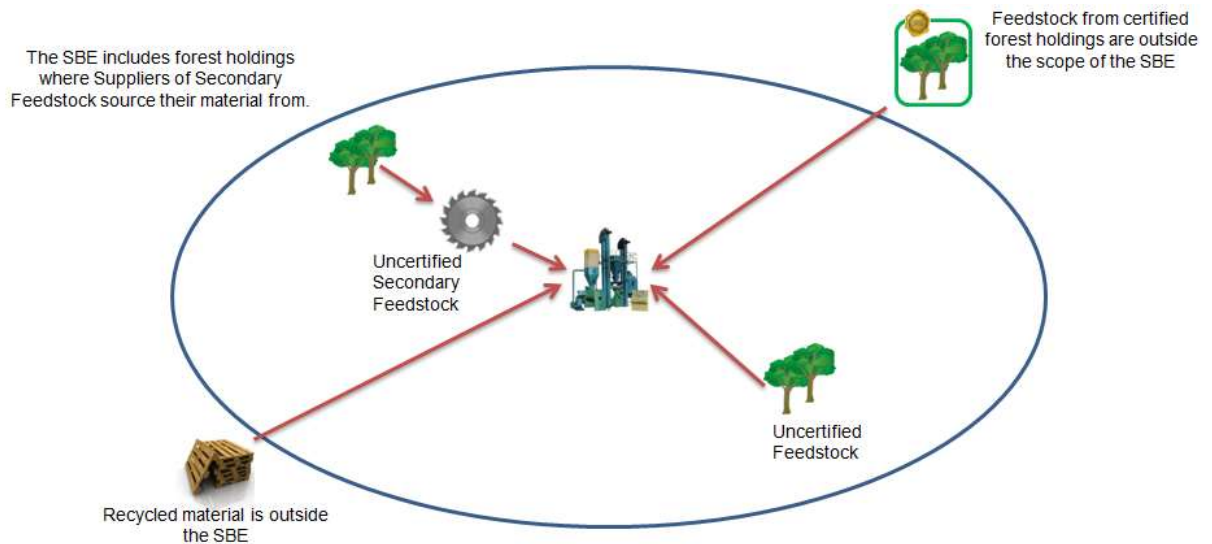
2.4 The scope of the Supply Base Evaluation

The SBE does not need to be undertaken for the following sources of feedstock:

1. Feedstock received with a certification claim under FSC or PEFC approved schemes, including SFI.
2. Feedstock from recycled sources.

For the following sources of feedstock the SBE must be undertaken but only against the indicators under some of the SFS criteria. This sub-set of criteria is listed in Table 1 of the SFS standard.

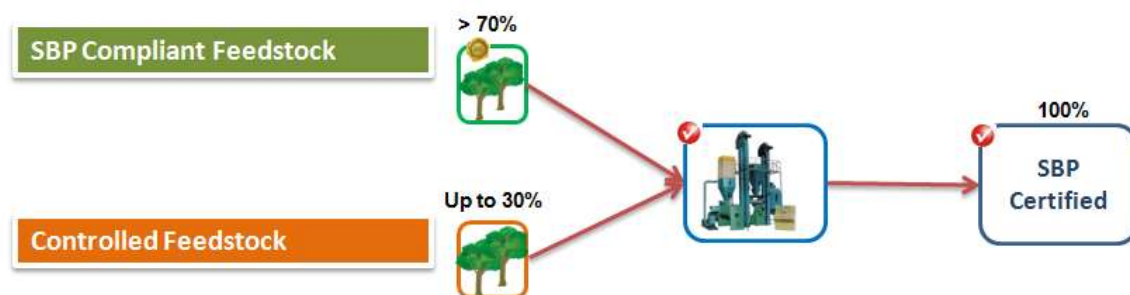
1. Primary feedstock that is classified as Controlled in the pellet mill’s inputs but is not received with an FSC or PEFC claim. The Controlled concept is discussed in more detail in the next section. Primary in this case means feedstock that hasn’t been processed and would include round timber.
2. Secondary feedstock which is a by-product of a production process and which isn’t received with an FSC or PEFC claim. In this case the origin of the material supplied to the sawmill needs to be included in the SBE. Secondary feedstock comes from a processor such as a sawmill and includes sawdust.



How different feedstock inputs fall inside and outside of the Supply Base Evaluation

2.5 Inputs into SBP compliant pellets

The standard requires that at least 70% of the feedstock used in the production of SBP pellets is SBP compliant feedstock. Up to 30% may come from controlled sources, in line with FSC Mixed and PEFC Mixed Sources concepts. Other feedstock cannot be used in the production of SBP pellets.



Example of the maximum permitted mix of controlled feedstock with SBP compliant feedstock in order to be able to make an SBP claim.

The following are the feedstock product groups and how they are characterized as either SBP compliant feedstock or controlled sources.

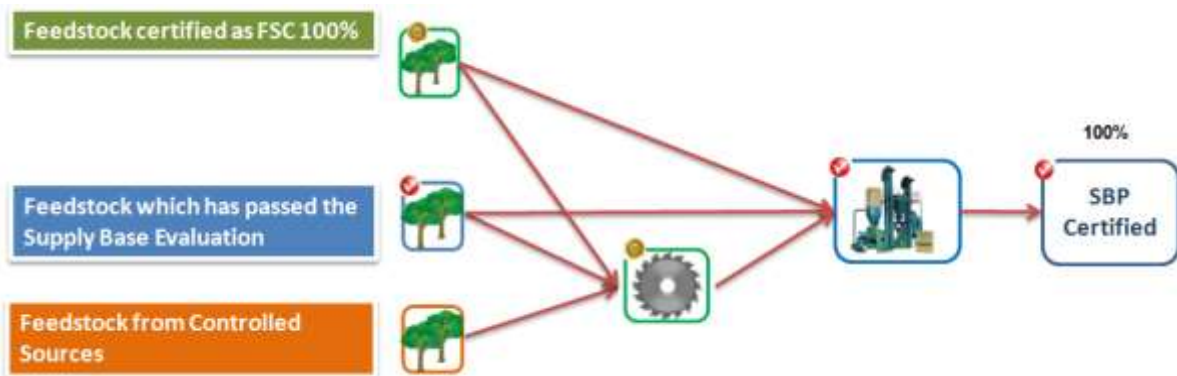
SBP Compliant Feedstock

1. SBP compliant Primary Feedstock. This material must either be
 - Supplied with a full FSC or PEFC approved claim. FSC controlled wood and PEFC controlled sources are excluded. SFI fibre sourcing is also excluded.

Or,



- Supplied from forest holdings within the scope of an SBP Supply Base Evaluation in which all indicators are rated as low risk.
2. SBP compliant Secondary Feedstock. This material is received as a residue from a processor and must either be
- Supplied with an FSC controlled wood or PEFC controlled sources claim. SFI fibre sourcing is excluded.
- Or,
- Originating from forest holdings within the scope of the SBP Supply Base Evaluation in which all indicators of the criteria specified in Table 1 of the Sustainable Feedstock Standard are scored as Low Risk.



Example of a mix of feedstock inputs that are all SBP compliant when received at the pellet mill

3. Recycled Feedstock. This is either pre-consumer or post-consumer reclaimed material.

Controlled Sources

1. Controlled Primary Feedstock. This material must either be
- Supplied covered by an FSC controlled wood or PEFC controlled sources claim. SFI fibre sourcing is excluded.
- Or,
- Supplied 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.

Note: there is no Controlled Secondary feedstock product group.



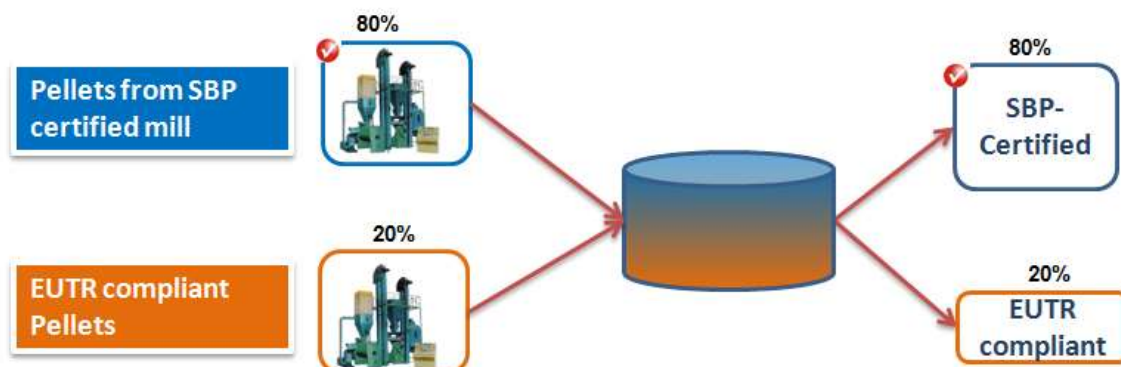
3 Chain of custody

3.1 Feedstock inputs

The pellet mill must be able to demonstrate where its feedstock came from. For material received from processors such as sawmills it must at least be able to infer where the material entering the sawmill came from so that it can define the extent of the Supply Base.

3.2 Mixing pellets downstream of the pellet mill

SBP pellets can be mixed with non-certified pellets downstream of the pellet mill. Mixing may only be undertaken with pellets that can be verified as legal. Legal in this sense means compliant with the EU Timber Regulation (EUTR) which set minimum requirements for all timber-based products imported into Europe. The volume of SBP certified material included into a mix must not be exceeded by the volume taken out as SBP certified.



3.3 Chain of custody options

There are two permitted options for operating a chain of custody system. The first option (Option A) is to use an (existing) FSC or PEFC chain of custody system for SBP material. The standard does not require that all SBP certified material is included within the scope of the FSC or PEFC certificate, but that the certified management systems are used to control the SBP material.

The second option (Option B) is to implement a system that meets the requirements specified in the standard but where the operation does not need to be FSC or PEFC certified.

3.4 Energy and carbon balance calculation

Information must be passed along the supply chain to enable calculations to be made by the generator. The requirements for how this is undertaken are specified.