



Draft for consultation

Sustainable Biomass Partnership
Standard #2: Standard for the Evaluation of Feedstock against the
Sustainable Feedstock Standard
Version 1-1. March 2014

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1 Background

The Sustainable Biomass Partnership (SBP) was formed in 2013 by seven major European utilities that are using biomass, mostly in the form of wood pellets, in large thermal power plants. The SBP views biomass-fired power and heat generation as a key technology in achieving the EU's 2020 renewable energy targets and curbing climate change and requires the use of sustainable and legally harvested feedstock that avoids the potential detrimental effects on the environment and social welfare.

SBP's objective is to develop the tools necessary to provide assurance that solid biomass used for sustainable energy production by its member organisations is compliant with regulations on sustainability and biomass legality in European Union countries, and that the sector is recognised as an exemplar of good practice. The SBP Biomass Assurance Framework is designed as a clear statement of principles, standards and processes necessary to demonstrate such compliance. Wherever possible, use is made of credible standards already applied to other forest product streams and other sustainable biomass sources.

2 Scope

This document covers the requirements for Biomass Producers to be able to evaluate Feedstock against the requirements specified in the SBP Sustainable Feedstock Standard Principles and Criteria.

3 Normative references

TBC

4 Terms and definitions

The **Biomass Producer** is a legal entity gathering and processing biomass feedstock for conversion into an end product which is suitable for power generation.

Controlled Feedstock. This is material that is either received with a claim that it is supplied within the Scope of an SBP Approved Controlled Feedstock System or included in the SBE. If included in the SBE, only the Criteria specified in Table 1 of the SBP Sustainable Feedstock Standard need to have been evaluated as low risk.

First-step wood processor. This includes any processing that transforms roundwood into materials other than roundwood.

Mitigation Measure. These are actions taken to control the risk of non-compliance of an Indicator so that it may be considered to have a Low Risk rating.



32 **Risk Assessment (RA).** This is the initial desk review component of the Supply Base Evaluation. It
33 comprises a desktop study of the supply base against the Principles, Criteria and Indicators of the SBP
34 Sustainable Feedstock Standard. Each Indicator is given a single rating “Specified Risk”, “Unspecified
35 Risk”, or “Low Risk”.

36 **SBP Approved Controlled Feedstock Systems.** These are currently FSC Controlled Wood and PEFC
37 Controlled Sources.

38 **SBP Approved Forest Management Schemes.** These are currently FSC and PEFC Forest Management
39 Schemes.

40 **SBP-compliant Primary Feedstock:** This material must either be received with a claim that it is
41 supplied within the Scope of an SBP Approved Forest Management Scheme or be supplied from
42 within the Scope of the SBP Supply Base Evaluation which is determined to be low risk.

43 **SBP-compliant Secondary Feedstock:** This material is received as a residue from a first-step wood
44 processor and must be supplied EITHER within the Scope of an SBP Approved Controlled Feedstock
45 System OR from forest holdings within the Scope of the SBP Supply Base Evaluation which is
46 determined to be low risk for Controlled Feedstock.

47 **SBP Feedstock Product Groups**

48 a. SBP compliant Primary Feedstock. This material must either be received by the BP with a
49 claim that it is supplied within the Scope of an SBP Approved Forest Management Scheme or
50 it must be supplied from forest holdings within the Scope of an SBP Supply Base Evaluation in
51 which all Indicators are rated as low risk.

52 b. Controlled Primary Feedstock. This material must be received with a claim that it is supplied
53 within the Scope of an SBP Approved Controlled Feedstock System or it must be supplied
54 from forest holdings within the Scope of the SBP Supply Base Evaluation in which all
55 Indicators of the Criteria specified in Table 1 of the Sustainable Feedstock Standard are rated
56 as low risk.

57 c. SBP compliant Secondary Feedstock. This material is received as a residue from a first-step
58 wood processor and must be supplied EITHER within the Scope of an SBP Approved
59 Controlled Feedstock System OR from forest holdings within the Scope of the SBP Supply
60 Base Evaluation in which all Indicators of the Criteria specified in Table 1 of the Sustainable
61 Feedstock Standard are rated as low risk.

62 d. Tertiary Feedstock. This is either pre-consumer or post-consumer material. Tertiary
63 feedstock is outside the scope of the Supply Base Evaluation.

64 i. **Pre- consumer Tertiary Feedstock**



65 • This material is received as a residue from a second-step wood processor and must
66 be supplied as compliant with EUTR requirements. An appropriate verification
67 process must be in place.

68 **ii. Post consumer Tertiary Feedstock**

69 • For BPs implementing PEFC systems, the PEFC definition of Recycled
70 Material/recycled material is used to define this material and corresponding PEFC
71 requirements on determining origin apply. Pre-consumer material is excluded from
72 this definition.

73 • For BPs implementing FSC systems, the FSC Standard for Sourcing Reclaimed
74 Material for Use in FSC Product Groups or FSC-certified Projects FSC-STD-40-007
75 (Version 2-0) EN applies. Pre-consumer material is excluded from this definition.

76 e. SBP non-compliant Feedstock. This is feedstock that cannot be allocated to any of the other
77 4 Feedstock Product Groups.

78 **Second-step wood processor.** Any processing that transforms the products of a first-step wood
79 processor.

80 **Sub-Scope.** The Scope of the SBE may be sub-divided into Sub-scopes such that all Indicators within
81 a Sub-scope have the same risk rating. In addition to geographic area, the Sub-scope can be defined
82 using other parameters; examples include type of harvesting operation or tree species. The Sub-
83 scope does not need to be a contiguous geographic area.

84 **Supplier Verification Program (SVP)** follows on from the Risk Assessment. It comprises further
85 evaluation of SBP Sustainable Feedstock Standard Indicators which were determined as 'Unspecified
86 Risk' during the Risk Assessment. At the end of the SVP process, all Indicators will be ranked as
87 either "Specified Risk" or "Low Risk".

88 **Supply Base Evaluation (SBE)** is the process whereby Biomass Producers evaluate the risk against the
89 Principles, Criteria and Indicators of the SBP Sustainable Feedstock Standard. The process comprises
90 the Risk Assessment and the Supplier Verification Program.

91



92 **5 Supply Base Evaluation**

93 Biomass Producers will undertake a Supply Base Evaluation to determine compliance of feedstock
94 with the Principles, Criteria and Indicators of the SBP Sustainable Feedstock Standard.

95 Feedstock received with a claim that it is supplied within the Scope of an SBP Approved Forest
96 Management Scheme, or with a claim that it is supplied within the Scope of an SBP Approved
97 Controlled Feedstock System may be excluded from the SBE. Otherwise, the SBE must cover all areas
98 from which all Primary and Secondary Feedstock categorized as SBP Sustainable or SBP Controlled
99 Feedstock is harvested.

100 The first component of the SBE is the Risk Assessment, comprising a review of compliance with the
101 SBP Principles, Criteria and Indicators.

102 The second component is the Supplier Verification Program. This is a more detailed evaluation to
103 determine the risk rating of any Indicators identified as Unspecified Risk in the Risk Assessment, as
104 either Specified Risk or Low Risk.

105 Where an Indicator of the SBP Sustainable Feedstock Standard is not rated as Low Risk, feedstock
106 shall not be classified as SBP compliant feedstock.

107 The Biomass Producer may use third parties, such as suppliers and harvesting contractors, to provide
108 evidence that Indicators are Low Risk. For example, for Secondary Feedstock where the Risk
109 Assessment identifies feedstock with an Unspecified Risk rating, the Secondary Feedstock supplier to
110 the Biomass Producer will need to demonstrate implementation of appropriate controls and
111 mitigation measures sufficient to enable the classification of Indicators as Low Risk.

112 Both the RA and the SVP are organised by the Biomass Producer. The Biomass Producer may
113 undertake the SBE in-house or contract it out to a body competent to undertake the work.

114 **6 Defining the Sub-scope within the SBE**

115 Within the Scope of the SBE, Sub-scopes may be defined by the Biomass Producers on the basis of
116 characteristics of the Supply Base and the Feedstock that enable the SBE to be more effectively
117 implemented. These characteristics will vary for different Supply Bases. Examples of the
118 characteristics used to define Sub-scopes include geographical attributes of the supply base,
119 ecological factors or operational factors.

120 Although definition of Sub-scopes will vary, within all Sub-scopes the risk rating of all Indicators will
121 be the same. The risk rating of individual Indicators between Sub-scopes may be different.

122 The use of Sub-scopes will enable different mitigation measures to be put in place for feedstock that
123 has differing characteristics and risk profiles.



124 An example of Sub-scope may be a geographic area covered by an SBP Approved Forest
125 Management Scheme.

126 The Sub-scope will always contain the same legislation covering:

- 127 • land ownership, use and harvesting rights
- 128 • biodiversity, water, air and soil protection
- 129 • basic labour rights and health and safety of forest workers
- 130 • waste handling and disease control, and
- 131 • tree felling licensing and replanting/regeneration requirements.

132 Sub-scopes may be redefined as feedstock inputs change.

133 **7 Scoring of risk**

134 Each Indicator must be rated on the following basis.

135 Low Risk – There is a negligible risk of non-compliance with the Indicator.

136 Unspecified Risk – An Indicator can only be rated as Unspecified Risk during the RA. It indicates that
137 there is insufficient evidence available in the RA to determine whether the Indicator rating is
138 Specified Risk or Low Risk.

139 Specified Risk – All Indicators which cannot be classified as Low or Unspecified Risk are rated as
140 Specified Risk.

141 **8 Determination of origin**

142 For inputs classified as SBP Compliant Primary Feedstock and SBP Controlled Primary Feedstock, the
143 Biomass Producer shall determine and keep records of the place of origin of the feedstock supplied.

144 For inputs classified as SBP Compliant Secondary Feedstock, the Biomass Producer shall determine
145 and keep records of the first-step wood processor supplying the feedstock. The Biomass Producer
146 shall either determine or infer the place of origin of the secondary feedstock supplied.

147 The Biomass Producer will ensure that the place of origin is within the Scope of the SBE.

148 **9 Competence in undertaking the Supply Base Evaluation**

149 The BP shall ensure that the body undertaking the SBE and its personnel have appropriate knowledge
150 and experience relevant to evaluating the SBP Sustainable Feedstock Standard in the local context of
151 the SBE scope.

152 The body undertaking the SBE shall include all of the following.



- 153 • Knowledge of business management practices
- 154 • Knowledge of the SBP requirements
- 155 • Knowledge of the operation of suppliers, including management systems and products
- 156 • Knowledge of the forest resource
- 157 • Knowledge of the SBE process
- 158 • Language skills appropriate to all stakeholders
- 159 • Note-taking and report-writing skills
- 160 • Interviewing skills
- 161 • Appropriate management skills

162 The body shall determine the competences required and the means for the demonstration of
163 competence prior to carrying out specific functions.

164 The body undertaking the SBE shall have a process for selecting and appointing the evaluation team,
165 including taking into account the competence needed to achieve the objectives of the SBE.

166 The justification for selection of personnel must be recorded and made available for the certification
167 body, and a summary presented in the public summary report.

168 The body undertaking the SBE shall have documented processes for executing the SBE.

169 **10 Sampling**

170 In undertaking the SBE, a sampling methodology will be implemented to ensure that there is a
171 credible determination of risk rating across the SBE.

172 **11 Stakeholder consultation**

173 Stakeholder consultation is required at the initial Supply Base Evaluation and at the five yearly re-
174 evaluation.

175 The principles in the Stakeholder consultation for forest evaluations FSC-STD-20-006 (V3-0) EN, are
176 considered to be good practice. The BP should also take into account any consultations undertaken
177 as a consequence of the recent operation of the plant, its permitting and construction, and the
178 outcomes of stakeholder consultations associated with existing BP certified management systems.

179 Relevant stakeholders shall be informed of the SBE at least one month prior to the end of the
180 evaluation. Notification will include adequate information to enable stakeholders to make informed
181 comment, but will not include sensitive or commercially confidential information.

182 All submissions will be reviewed, and the content of submissions relevant to compliance with the SBP
183 requirements will be evaluated during the evaluation process. There is no requirement to evaluate
184 comments that are not relevant to the SBE or SBP certification requirements. The Biomass producers



185 will record submissions received, actions taken in relation to relevant submissions, and the
186 conclusion reached regarding the SBE.

187 Submissions received by the biomass producer that include information relevant to compliance with
188 the SBP requirements, will be evaluated in a timely manner. Records of the evaluation of all
189 submissions and the outcomes will be maintained.

190 **12 Requirements for SVP evaluation**

191 The purpose of the SBE is to determine the risk level for those Indicators for which the RA was
192 inconclusive, where Indicators were rated as Unspecified Risk. The SVP may include visits to, and
193 possibly evaluation of, the BP's feedstock suppliers. The purpose, extent and nature of any SVP
194 evaluation and the associated mitigation measures will be documented.

195 **13 Mitigation measures**

196 Where an Indicator is scored as Unspecified Risk, Mitigation Measures must be taken to reduce the
197 risk level to Low Risk.

198 Mitigation measures shall be justified, and the justification recorded.

199 The biomass producer shall implement a plan to monitor the effectiveness of the mitigation
200 measures. This evaluation of mitigation measures will occur at least annually.

201 Where mitigation measures are not effective in managing risk, and an Indicator is consequently no
202 longer rated as Low Risk, all material within the relevant Scope or Sub-Scope of the SBE will not be
203 compliant with the SBP Sustainable Feedstock Standard until effective mitigation measures have
204 been implemented.

205 **14 Supply Base Evaluation Interval**

206 The SBE shall be undertaken at least every five years.

207 The SBE shall be modified with changes in the supply base. All suppliers will be included in the scope
208 of the SBE.

209 Any significant changes that are likely to affect the SBE will result in a review, and, if required,
210 revision of the SBE by the Biomass Producer to ensure that the SBE risk rating remains accurate.



211 **15 Reporting**

212 The scope, justification and complete findings of the SBE, including the RA and SVP, shall be recorded
213 in a report. The SBE report shall present the Findings, Means of Verification and Evidence Reviewed
214 for each Indicator. The risk rating for each Indicator must be stated.

215 Any mitigation measures shall be recorded in the SBE report, together with the planned monitoring of
216 the mitigation measures and the results of the monitoring. The results of the monitoring and any
217 changes to the mitigation measures implemented shall be updated annually in the SBE report.

218 A Summary of Findings of the SBE report shall be made publicly available and readily accessible on
219 the Biomass Producer's website. Commercially sensitive and confidential information can be
220 excluded from this Summary of Findings.

221 The complete SBE report shall be sent to the SBP secretariat, and the Summary of Findings may be
222 uploaded onto the SBP website.

223 **16 Credibility of the SBE**

224 The BP shall ensure the credibility of the SBE. The Biomass producers will implement measures to
225 support the credibility of the SBE, appropriate to the context of the SBE and to the biomass producer.

226 In all cases, the findings of the SBE will be signed off by senior management.

227 The following list is indicative of additional options to support a credible SBE process. It is neither
228 exhaustive nor normative.

229 • The draft findings of the SBE are peer reviewed by an independent and competent party
230 prior to finalization.

231 • The findings of the SBE are made available for public consultation prior to finalization.

232 **17 Substantiated comments or complaints**

233 The Biomass Producer shall ensure that substantiated comments or complaints regarding any aspect
234 of the SBE and SBP certification, are promptly investigated and documented with remedial actions
235 implemented for any that are justified.