



Standards Development Process

# Standards Development Process: Gap Analysis

**Sustainable Biomass Program**  
sbp-cert.org

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## 1 Introduction

This document is the result of an initial scan of areas for improvement within the standards and is based on the extensive experience of the SBP certification system by an external expert. The issues are presented for consideration by the Working Groups when developing Revision Draft v1 of the standards. The issues are grouped according to topic.

## 2 General approach

- Ensure that the Standards Development Process aligns with and fully supports the strategic plans, opportunities and key results that SBP is focused on and intent on developing/realising

This may include historical drivers, such as legislative/regulatory framework with the desire to avoid 'reinventing the wheel', and upcoming drivers, such as ISEAL requirements, market changes, evolution of biomass certification.

- Prioritise revision of criteria and indicators based on impact/outcome and mapped to priority issues as set out in the Standards Development Terms of Reference

- Review the style of the standards to ensure documents are accessible and easy to use

Consider how to effectively and clearly communicate the intent and meaning of the normative requirements to the user and how to reduce confusion caused by the density of the normative language. For example, change the design and layout the standards away from purely text and towards the use of (more) pictures and/or diagrams.

- Stakeholder Consultation

Set up a registry for stakeholders and require interested parties to sign up to receive notifications. SBP should make use of Certification Bodies (CBs), Certificate Holders (CHs) and other internal stakeholders (e.g. Committee Members as 'promoters' of the registry in order to get the message out to any/all potentially interested and/or directly affected stakeholders).

### 3 Standards content

- Consolidation and streamlining

Improve ease of use through incorporating all of the interpretations into the appropriate 'parent' clauses in the standards and merging all the Instruction Notes and Instruction Documents into their parent sections, thereby avoiding Instruction Notes as Annexes and Instruction Documents as separate publications. Wherever feasible, including guidance information within the standards documentation as well (look at the MSC CoC default standard v5.0 for an example of this). Consider withdrawing all of the Instruction Notes and Instruction Documents that are no longer applicable.

- Review and update all definitions in the Glossary

Formally refer to the Glossary as a normative document.

- Develop eligibility requirements

Enhance clarity for organisations seeking certification and ensure certificate scope can be clearly defined during the application process.

- Standards 1 and 2: opportunities

- Combine Standards 1 and 2.
- Ensure clarity in the explanation of the scope of the risk assessment; in particular 'landscape level' and 'assessment at the level of the individual forest management unit/tract'.
- Ensure clarity in the requirements for verifying that forests and other areas with high conservation value in the Supply Base are identified and mapped. Consider specifying minimum verifiers to strengthen consistency across Biomass Producers (BPs).
- Expand the concept of 'sub scopes' to all Supply Bases. For instance, a hypothetical BP sourcing only SBP-compliant feedstock could still have a diverse range of inputs that need (or are worth) parsing into 'sub-scopes' (e.g. FSC certified residue/SFI certified softwood roundwood/FSC hardwood secondary feedstock/SFI softwood secondary feedstock).

- Review Supply Base Report template

As it is currently written, the Supply Base Report template, section 2.5 'Quantification of the Supply Base', identifies most of the key metrics and attributes that need to be tracked, but it does so in a way that encourages consolidation rather than enhanced granularity. See FSC requirements for 'Obtaining Information on Material' in Controlled Wood standard, section 2 – particularly 2.3-2.5. Visibility back to source may be a key attribute to focus on and try to tease out into metrics, especially where SBEs are implemented.

- Consider the development of an SBE reporting template

Such a template would allow any changes that have occurred within a BP's SBE since the last audit to be clearly identified. Consider what resource, when properly implemented, would best enable BPs to clearly report changes to their SB / SBE since the last audit or update. The CH would have to

formally declare and define all of the changes, and then the CB would assess the declared information and use that information to formulate a scope of audit.

- **Standard 3: opportunities**

- Instead of using FSC/ PEFC underlying accreditation and link to the system used to audit a client replace by reference to ISO 17021: Conformity assessment – requirements for bodies providing audit and certification of management systems.
- Keep FSC/ PEFC accreditation as way of ensuring general competence of CBs for SBP certification services.
- Limit Standards 3 to SBP-specific topics.
- Consider combining sections 5 and 6.
- Define accreditation scope requirements.
- Define certification scope requirements (reference to SBE countries and feedstock types) and link them to accreditation scope.
- Define sampling requirements at the level of Forest Management Units, secondary supply chains and for evaluating mitigation measures.
- Define audit time and certification decision requirements.
- Clarify the purpose of and methods for effective stakeholder engagement.
- Clarify the purpose of and methods for Chain of Custody (CoC) evaluation; cover critical control points and conversion factors.
- Specify competence requirements for auditing SBEs and PEFC/ FSC CoC.
- Specify competence requirements for peer reviewing.

- **Chain of Custody**

There is significant overlap between Standard 4, section 5.2 'Inputs' and Standard 2, section 8.2 'Feedstock'. Suggest more closely correlating (or even combining) these normative clauses for improved clarity and ease of use.

## 4 Assurance

- **Move away from Word audit reports to audit management software**

Investigate e-auditing platforms and consider audit template forms in some other format, e.g. Excel.

- **Chain of Custody accreditation requirements**

Consider combining section 5.4 and most of Section 6 of Standard 4 into one table that lays out the accreditation requirements for a BP in relation to the CoC systems used by that BP, along with the BP's scope of certificate (SBE or no SBE). Consider whether to specifically identify in Standard 4 that the CH must pick one scheme that they are using as their 'underlying' scheme for SBP. The CB's audit of the CH follows the accreditation requirements of that same scheme and should consider the relevant audit findings and any corrective action reports. Consolidate and restructure Instruction Notes and Instruction Documents.

- **Publishing reports to SBP/on the SBP website**

Consider making the CB responsible for publishing reports, e.g. Standard 2, Clause 7.2 applies to CHs, consider making it applicable to CBs wherever possible. Traditionally, the CB is the 'middle man' between the CH and the scheme owner, and all reporting requirements are the CBs burden to bear.