

Instruction Document 3I: SBP Requirements for Certification Bodies Auditing SBP Group Schemes



Version 1.0 November 2018

Instruction Document 3I effective from 6 November 2018

Document history

Published 6 November 2018 (effective)

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Foreword

At the end of August 2018, the Sustainable Biomass Program issued *Instruction Document 2D: SBP Requirements for Group Schemes* enabling SBP Certificate Holders to demonstrate compliance with the Netherlands SDE+ sustainability requirements for biomass categories 1 to 4.

This document sets out additional requirements for Certification Bodies auditing a Biomass Producer (BP), where the scope of certification includes Instruction Document 2D.

This document is adapted from the FSC document, Forest management evaluations FSC-STD-20-007 (V3-0) EN.

Scope

This Instruction Document specifies normative requirements to SBP Certification Bodies auditing SBP Group Schemes against *Instruction Document 2D: SBP Requirements for Group Schemes*.

1. General requirements

1.1 Where a BP is operating a Group Scheme the CB shall verify compliance with the relevant SBP standards and SBP instruction documents across the scope of the BP certificate, including at the level of Group Member.

1.2 The Certification Body shall carry out an analysis and description of the forest management units (FMU) proposed for inclusion within the scope of the group evaluation.

1.3 The Certification Body shall establish appropriate sampling of FMUs within the scope of the evaluation.

1.4 The Certification Body shall carry out an initial analysis of the supplier's management systems and capacity to administer the requirements of those systems.

1.5 The Certification Body shall carry out an explicit review of conformity with the requirements for both Group Mangers and Group Members.

1.6 The Certification Body shall classify the FMUs included in the scope of the evaluation as sets of 'like' FMUs for the purpose of sampling.

The sets shall be selected to minimise variability within each set in terms of:

- a) forest types (natural/ semi-natural vs. plantation); and
- b) FMU size class.

NOTE: A group may consist of one or more sets of 'like' FMUs.

1.7 For each set of 'like' FMUs thus identified, the Certification Body shall select a minimum number of units for evaluation (x) as specified in section 4 of this Instruction Document.

2. The evaluation

2.1 The auditor(s) shall identify and assess management documentation and a sufficient variety and number of records at each FMU selected for evaluation as to make direct, factual observations to verify conformity with all the indicators of the SBP Instruction Document 2D.

2.2 The auditor(s) shall visit a sufficient variety and number of sites within each FMU selected for evaluation as to make direct, factual observations as to conformity with all the indicators of SBP Instruction Document 2D.

2.3 The auditor(s) shall interview a sufficient variety and number of people affected by or involved in the forest management of each FMU as to make direct, factual observations as to conformity with all the indicators of SBP Instruction Document 2D.

2.4 The Certification Body shall carry out an evaluation to assess conformity with SBP Instruction Document 2D (initial audit and re-certification) or monitor the certificate holder's continued conformity with SBP Instruction Document 2D at least annually (surveillance audit).

2.5 All evaluations shall follow clear, documented procedures and shall cover:

- a) Any changes to the forest area included in the scope of the certificate, including additions, exclusions, or FMU boundary changes;
- b) Changes to the certificate holder's management system;
- c) Complaints received;
- d) Accident records;
- e) Training records;
- f) Operational plan(s) for the next 12 months;
- g) Inventory records;
- h) Harvesting records;
- i) Records of sales
- j) The group management system
- k) The updated list of Group Members;
- l) The rate of membership change within the group in relation to the specified increase and maximum group size;
- m) Formal communication / written documents sent to Group Members by the Group Manager since the previous Certification Body surveillance;
- n) records of NL SDE+ compliant feedstock in accordance with the definitions of Categories;
- o) records of monitoring carried out by the Group Manager; and
- p) records of any corrective actions issued by the Group Manager.

2.6 In addition surveillance and re-evaluation audits shall include:

- a) evaluation of the certificate holder's compliance with all conditions (corrective actions) on which certification is based;
- b) review of any complaints or allegations of non-conformity with any aspect of SBP Standards or Instruction Documents; and

- c) evaluation of a sample of sites and records, and interviews with affected stakeholders sufficient to verify that management systems (documented or undocumented) are working effectively and consistently in practice, in the full range of management conditions present in the area under evaluation.

3. Non-conformities

Non-conformities

3.1 Each non-conformity against the applicable certification requirements shall be evaluated to determine whether it constitutes a minor or major non-conformity at the level of the individual requirement.

3.2 The Certification Body must explicitly define the methodology by which the Certification Body determines 'failure' of a group evaluation: at the time of main evaluation AND at the time of surveillance. The specification of 'failure' shall also distinguish between 'group failure' and 'member failure', where:

A) 'Group failure' shall lead to corrective actions, suspension or withdrawal of the Group Scheme from the scope of the BP's certificate, and may be caused by:

- a) failure to fulfil a Group Manager responsibility, such as administration, management planning, records, monitoring, etc;
- b) failure of the Group Manager to ensure that Group Members comply with a condition or corrective action issued by the Certification Body; and/or
- c) failure to fulfil Group Member responsibility(s), sufficient in number, extent and/or consequences to demonstrate that the Group Manager's responsibility for monitoring or quality control has broken down.

NOTE: the number as well as the seriousness of member failures may each contribute to a group failure: many minor failures or few major failures may both suggest a breakdown in the group system for quality control, and may be considered sufficient reason to withdraw the Group Scheme from the scope of the BP's certificate .

B) Depending on the number and seriousness, 'member failure' shall lead to corrective actions, suspension or expulsion of a Group Member.

4. Sampling

4.1 The Certification Body shall assess the Group Manager in addition to the sampled FMUs

4.2 Depending on risk factors, stakeholder complaints or non-conformities the number of units to be evaluated shall be increased in relation to the calculated minimum.

4.3 Sampling process for large and medium size FMUs:

A) all FMUs under scope of the certificate shall be divided to two sets of “likes” in accordance with the FMU size class in the table below.

B) For each set of 'like' FMUs to be sampled, the Certification Body shall select a minimum number of units for evaluation (x) by applying the applicable formula in the table below (y= total number of FMUs within a set of 'like' FMUs).

| FMU size class | Main evaluation | Surveillance | Re-evaluation |
|---------------------|----------------------|----------------------|----------------------|
| > 10,000 ha | $X = \sqrt{y}$ | $X = 0.8 * \sqrt{y}$ | $X = 0.8 * \sqrt{y}$ |
| > 1,000 – 10,000 ha | $X = 0.3 * \sqrt{y}$ | $X = 0.2 * \sqrt{y}$ | $X = 0.2 * \sqrt{y}$ |

4.4 Sampling process for small size FMUs:

A) all FMUs under scope of the certificate shall be divided to two sets of “likes” in accordance with the FMU size class in the table below.

B) For each set of 'like' FMUs to be sampled, the Certification Body shall select a minimum number of units for evaluation (x) by applying the applicable formula in the table below (y= total number of FMUs within a set of 'like' FMUs).

| FMU size class | Main evaluation | Surveillance | Re-evaluation |
|----------------|----------------------|----------------------|----------------------|
| 100 -1,000 ha | $X = 0.8 * \sqrt{y}$ | $X = 0.6 * \sqrt{y}$ | $X = 0.6 * \sqrt{y}$ |
| < 100 ha | $X = 0.6 * \sqrt{y}$ | $X = 0.3 * \sqrt{y}$ | $X = 0.3 * \sqrt{y}$ |

4.5 Mega groups of small size FMUs ≤ 1,000 ha:

A) For mega groups or sets of small size FMUs (i.e. more than 5,000 members per group or set) the Certification Body may sub-stratify the group or sets of small size FMUs according to the level of risk in relation to presence of HCVs, land tenure or land use disputes, and long harvesting cycles.

B) In the demonstrated absence of:

- high conservation value attributes, and
- land use or tenure disputes, and
- short (< 30 years) rotation cycles...

...the Certification Body may reduce the sampling size.

4.6 The process and results of sampling shall be documented in the Public Summary Report.