

# SBP

Sustainable Biomass Program

# SBP Document Development Procedure

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SBP Contact information. T: +371 292 033 88; E: [info@sbp-cert.org](mailto:info@sbp-cert.org)

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In the case of inconsistency between translations, the official English language version shall always take precedence.

**SBP welcomes comments and suggestions for changes, revisions and/or clarifications on all of its Standards documentation. Please contact: [info@sbp-cert.org](mailto:info@sbp-cert.org).**

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# 1 Purpose and scope

This Procedure specifies the steps to be followed for the revision of existing documents or the issuing of new documents that informs the implementation and operation of the Sustainable Biomass Program (“SBP”) certification system. Revision and issuing of new documents are collectively referred to as document development. This Procedure covers a wide range of both normative and non-normative documents implemented across the SBP certification system, including sustainability standards, other standards, Instruction Documents, Guidance, Normative Interpretations, Process and Contracts.

All documents that inform the implementation and operation of the SBP certification system shall be developed in compliance with this Procedure. The scope of this Procedure does not cover documents created through the day-to-day operation of the certification system, such as emails.

The purpose of this Procedure is to ensure the credibility of all SBP documents, by incorporating the values of transparency, participation and fairness into the processes for their development, and through compliance with international best practice for standards development.

## 2 Definitions

**Consensus:** General agreement, characterised by the absence of sustained opposition to substantial issues by any important stakeholder group.

**Guidance Documents:** Documents that provide non-normative information on the application of the standards. An example is the *SBP Guidance Document: Meeting SBP criteria in relation to protecting exceptional conservation values in the southern US*.

**Instruction Documents:** Documents that instruct how the standards are to be applied.

**Normative Documents:** A document which is indispensable for the application of the standard. The applicable rules shall be strictly followed. These include Standards, Instruction Documents and Normative Interpretations.

**Normative Interpretations:** Documents that provide normative information on the application of the standards and shall be strictly followed.

**Process Documents:** Documents that set out a series of actions or steps taken in order to achieve a particular end. Process Documents include Procedures and Work Instructions, examples of which are the Appeals Procedure, and internal Secretariat Work Instructions.

**Stakeholders:** Interested parties including those directly and indirectly affected by the application of the documents.

**Standards:** Documents that provide, for common and repeated use, rules, guidelines or characteristics for products or related processes and production methods. There are currently six (6) standards.

**SDE+ subsidy regime:** (in Dutch: Stimulerend Duurzame Energieproductie) an operating grant, which aims to encourage the production of renewable energy in the Netherlands.

**SBP documents:** These include both normative and non-normative documents including sustainability standards, other standards, instruction documents, guidance, normative interpretations, process documents and contracts necessary to ensure consistent application of requirements, deliver credible claims and achieve SBP's objectives.

**User Guides:** Documents providing guidance on using aspects of the SBP system, including the Data Transfer System (DTS).

## 3 References

### Standards and Guidelines:

- ISEAL Standard-Setting Code of Good Practice Version 6.0

## 4 SBP governance and responsibilities

The following groups are involved in the SBP document development process:

**Board** comprising: one independent Chairman, three biomass producers, three end-users and three civil society representatives. The Board takes the final decision to revise or issue new sustainability standards (standards 1 and 2).

**Secretariat** is responsible for coordinating and communicating the development of documents in accordance with this Procedure.

**Stakeholder Advisory Group (SADG)** a representation of stakeholders, which provides a platform for stakeholder input and encourages generation of stakeholder advice.

**Stakeholders** interested parties including those directly and indirectly affected by the application of the documents.

**Standards Committee (SC)** comprising six commercial interest representatives and six civil society representatives. The Standards Committee is responsible for reviewing and approving Category 1 and 2 documents including standards and may approve other documents. The Committee takes the final decision to initiate the development of Category 2 documents. The Standards Committee should be consulted by the Board prior to initiating the development of Category 1 documents.

**Technical Committee (TC)** comprising six experts, advises on technical aspects of SBP documents. The Technical Committee may make approval recommendations for Category 3 documents and reviews and makes recommendations on Category 1 and 2 documents prior to approval by the Standards Committee. The Technical Committee should be consulted by the Standards Committee prior to initiating the development of Category 1 and 2 documents.

## 5 Determination of need for document development

5.1 Any stakeholder may at any time request to revise existing documents or issue new documents. Requests may be submitted via the website or by email to the Secretariat.

5.2. The Secretariat shall record all such requests.

5.3 In order to determine the need for document development the Secretariat shall critically analyse the requests, seek additional stakeholder inputs where appropriate and review any feedback received.

5.4 The determination of need should consider:

- i. Time since last review;
- ii. Stakeholder feedback;
- iii. Results of auditing and accreditation;
- iv. Published interpretations and guidance;
- v. Changes in scientific knowledge, management best practice, legislation and markets;
- vi. Relevance and effectiveness of documents in meeting objectives, including analysis of impacts and monitoring and evaluation data; and
- vii. Any other significant changes or impacts.

5.5 Following a determination of need the Secretariat may decline the request to revise or develop new documents. In this case the Secretariat will respond to the stakeholder, setting out the reasons for declining the request. The Standards Committee shall be notified of the request and reasons for declining the request.

5.6 The Secretariat shall inform the Standards Committee at each of its meetings in advance of any planned document development of any category, together with notification of the proposed process to be followed.

5.7 The Secretariat shall inform the Standards Committee at each of its meetings of any document development of any category since the last meeting, together with the document development process that was implemented.

## 6 Document categories and processes

### 6.1 Document categories

All documents related to implementation of the SBP certification system are categorised as follows:

**Category 1 – Sustainability standards.** These aim to achieve social, environmental or economic outcomes at the international, regional, national or sub-national level. These include standard 1 and standard 2. These are normative documents.

**Category 2 – Standards other than sustainability standards.** These include standards 3 to 6. Additionally, Instruction Documents related to standards 1 and 2. These are normative documents

**Category 3 – Normative documents other than standards.** In the SBP certification system these include Instruction Documents for standards 3-5, Data Transfer System (DTS), SBP-endorsed Regional Risk Assessments, and Normative Interpretations. These are normative documents.

**Category 4 – Other documents.** In the SBP certification system, including a wide range of documents such as, user guides and other non-normative documents such as contracts.

### 6.2 Document development processes in outline

6.2.1 If a need for document development is determined (section 5) and this is approved (section 7) the Secretariat will initiate the appropriate document development process in accordance with the category of the document.

6.2.2 The following minimum document development processes apply:

**Category 1** – the process shall include the establishment of one or more Working Groups, at least one round of stakeholder consultation (60 days for round 1, 30 days for round 2 if required), consultation of the Technical Committee, Stakeholder Advisory Group and approval by the Standards Committee. See also section 9.

**Category 2** – the process shall include consultation of the Technical Committee, Stakeholder Advisory Group and approval by the Standards Committee and may include the establishment of one or more Working Groups. See also section 10.

**Category 3** – the process shall include recommendation for approval by the Technical Committee and approval by the Chief Technical Officer (CTO) or Chief Executive Officer (CEO). See also section 11.

**Category 4** – the process may be completed by the Secretariat. See also section 12.

6.2.3 The Standards Committee and Secretariat may add additional requirements to those set out in this procedure considering factors such as those in 8.5.1.2 i - iv.

Example: A document defined as category 3 in this procedure may be subject to the category 2 document development requirements prior to publication.

6.2.4 Document development of Category 2, 3 or 4 documents upon which SBP approval under the Dutch SDE+ (Stimulerend Duurzame Energieproductie. English: Stimulation of Sustainable Energy Production) scheme depends shall be subject to stakeholder consultation of at least 30 days.

## 7 Approval to develop documents

### 7.1 Category 1 documents

7.1.1 All Category 1 documents shall be subject to a determination of need for document development by the Secretariat at least every five (5) years.

7.1.2 The decision to approve the document development of existing Category 1 documents or issue new Category 1 documents rests with the Board. The decision shall be informed by the review and determination of need for document development, Section 5.

7.1.3 The Board should consult the Stakeholder Advisory Group, Secretariat, Standards Committee, and the Technical Committee in arriving at this decision.

### 7.2 Category 2 documents

7.2.1 All Category 2 documents shall be subject to a determination of need for document development by the Secretariat at least every five (5) years.

7.2.2 The decision to approve the document development of existing Category 2 documents or issuing new Category 2 documents rests with the Standards Committee. The decision shall be informed by the review and determination of need for document development, section 5.

7.2.3 The Standards Committee should consult the Stakeholder Advisory Group, Secretariat, and the Technical Committee in arriving at this decision.

### 7.3 Category 3 and 4 documents

7.3.1 The decision to develop Category 3 or 4 documents rests with the Secretariat, with the Standards Committee being informed.

## 8 Common process requirements

### 8.1 Records

8.1.1 The Secretariat shall undertake the following actions for Category 1 and Category 2 processes.

- i. Keep on file for at least five (5) years the following records related to each document development:
  - a. Policies and procedures guiding the standard-setting activity;
  - b. Lists of stakeholders contacted;
  - c. Stakeholders involved at each stage of the process;
  - d. Comments received and a synopsis of how those comments were taken into account;
  - e. All draft and final versions of the standard.

and

- ii. Make these available to stakeholders upon request.

8.1.1 The Secretariat shall keep records of substantive comments received which would inform a future determination of need for document development and any subsequent document development.

### 8.2 Content of sustainability standards

8.2.1 Sustainability standards (standards 1 and 2) shall include:

- i. Defined social, environmental and economic outcomes clearly and explicitly in the standard in compliance with the ISEAL Impacts Code;
- ii. Criteria included to address all of the defined social, environmental and economic outcomes;
- iii. Only criteria that are relevant to meeting these outcomes;
- iv. A statement that claims made about the standard or about compliance with the standard are consistent with the defined social, environmental and economic outcomes. (see ISEAL Impacts Code 6.5 and ISEAL Claims Good Practice Guide);
- v. A reference to relevant, existing national and/or international laws and regulations and how these are met or exceeded;
- vi. The planned date of the subsequent review;
- vii. Contact information;
- viii. The formal status of the document (final, draft etc);
- ix. A note that, in the case of inconsistency between translations, the official English language version shall always take precedence;
- x. The date of a revision or reaffirmation of the document;
- xi. The transition period by which the revised document will come into effect. Note: Transition periods shall be determined as part of the review and drafting process; and
- xii. A statement inviting comments on recommended revisions or clarifications.

8.2.2 Sustainability standards (standards 1 and 2) shall:

- i. Be written in SBP's official language (English) and only include language that is clear, specific, objective and verifiable;
- ii. Be expressed in terms of process, management and performance criteria, rather than design or descriptive characteristics;
- iii. Not favour a particular technology or patented item<sup>1</sup>;
- iv. Include definition of the scope to which the standard applies;
- v. Attribute or cite all original intellectual sources of content; and
- vi. Not present administrative requirements related to assurance, claims or labels or other non-technical issues integrated with technical and/or performance requirements.

8.2.3 Guidance shall be provided to support consistent interpretation of requirements.

8.2.4 Where effective and appropriate international standards shall be used as the basis for developing national or regional standards which are themselves consistent with the international standards.

8.2.5 The requirements for sustainability standards (8.2.1 to 8.2.4) should also be adopted in other documents where appropriate.

### 8.3 Accessibility

8.3.1 The Secretariat shall seek to ensure that translations of the sustainability standard are available in additional languages where this supports the effective and consistent implementation of the scheme. Where the Secretariat authorises additional translations, it shall have oversight and responsibility for these translations.

8.3.2 The Secretariat shall make hard copies of, standards, public summaries of standards and other materials related to standards available upon request at as low a cost as possible and covering only reasonable administrative costs.

8.3.3 This procedure shall be free and publicly available on the SBP website in electronic format.

8.3.4 The Complaints Procedure shall be followed when complaints relating to procedural matters are received.

8.3.5 Complaints about the content of documents shall be treated as feedback on the documents and recorded and reviewed in accordance with this procedure.

8.3.6 The Secretariat shall prepare, at least annually, a work programme including Category 1 and 2 documents that it is currently preparing, and those which it has adopted in the preceding period. This work programme will be made available on the SBP website.

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<sup>1</sup> Recognition of other certification schemes is permitted.

## 8.4 Making non-substantive changes

8.4.1 Non-substantive changes such as typographical errors, formatting, or organisation of the document and minor inconsistencies within Category 1 and Category 2 documents may be implemented following a recommendation for approval by the Technical Committee and approval by the Chief Technical Officer (CTO) or Chief Executive Officer (CEO).

8.4.2 Non-substantive changes within Category 1 and Category 2 documents involving clarification of language may be implemented following a recommendation for approval by the Technical Committee and approval by the Chief Technical Officer (CTO) or Chief Executive Officer (CEO). The Technical Committee may refer the proposed changes to the Standards Committee if it considers the changes substantive, but in all cases the Standards Committee will be notified.

8.4.3 Non-substantive changes within Category 3 and Category 4 documents may be approved by the Secretariat.

8.4.4 The updated documented shall clearly identify the changes made, version number and date.

8.4.5 The release of the revised documents shall be communicated to users, specifically where appropriate conformity assessment bodies, certificate holders, and other known stakeholders.

## 8.5 Making urgent substantive changes

Substantive revisions include changes to the requirements that would require a change in practice by certified enterprises.

8.5.1 Where an urgent substantive change (either revision or new documents) to a Category 1 or 2 document is determined to be needed the Secretariat shall draft the document.

8.5.1.1 The Secretariat shall present the draft document to the Technical Committee for review and comment.

8.5.1.2 The Standards Committee will consider approving the document taking into consideration at least the following:

- i. The need for change;
- ii. Ensuring the credibility of all SBP documents;
- iii. Ensuring transparency, participation and fairness in the process; and
- iv. Compliance with international best practice for standards development.

8.5.2 Urgent substantive changes to Category 3 and Category 4 documents may be implemented by the Secretariat.

8.5.2.1 The Standards Committee shall be informed before the changes are released.

8.5.2.2 The updated documents shall clearly identify the changes made, version number and date.

8.5.2.3 The release of the revised documents shall be communicated to users, specifically where appropriate conformity assessment bodies, certificate holders, and other known stakeholders.

## 8.6 Consistency between standards

8.6.1 The website shall make explicit reference to other relevant schemes that are complying with good practices and are operating in the same sector, policy area and geographical regions and identify where approaches converge.

8.6.2 Possibilities for unilateral or mutual recognition for parts or all of the system requirements shall be actively explored by the Secretariat.

## 8.7 Representative participation

8.7.1 Participation goals for interest sector engagement shall be set to help achieve representative participation in standard-setting activities. Performance against these goals will be monitored and these goals will be evaluated and updated over time.

## 8.8 Review of this procedure

8.8.1 This procedure shall be reviewed at least every five (5) years and before commencing a Determination of need for document development of Category 1 documents.

## 8.9 Exceptions to this procedure

8.9.1 The Secretariat may request an exception in the implementation of this procedure when developing documents.

8.9.2 The Standards Committee will consider approving the exception taking into consideration at least the following:

- i. The need for variation;
- ii. Ensuring the credibility of all SBP documents;
- iii. Ensuring transparency, participation and fairness in the process; and
- iv. Compliance with international best practice for standards development.

## 9 Document development process of Category 1 documents (sustainability standards)

### 9.1 Terms of reference

9.1.1 The Secretariat shall draft or update the Terms of Reference (ToR) for the sustainability standard to be developed. ToR shall include:

- i. Objectives of the sustainability standard;
- ii. How the objectives contribute to the SBP vision/ purpose;
- iii. An up-to-date list of stakeholders based on the scope of the sustainability standard and its intended outcomes;
- iv. Steps in the standard-setting process including timelines and clearly identified opportunities for contributing;
- v. Decision-making process;
- vi. Proposed scope, including intended geographical scope of the sustainability standard;
- vii. A justification of the need for the standard, including: an assessment of the most important sustainability issues falling within the scope of the standard; an explanation of whether the proposed standard will meet an expressed need; and documents of other standards operating or in development that meet all or part of the expressed need;
- viii. Clear social, environmental and economic outcomes that the standard seeks to achieve and how those are linked to the SBP's intended change (see ISEAL Impacts Code); and
- ix. An assessment of risks in implementing the standard and how to mitigate these, including: identification of factors that could have a negative impact on the ability of the standard to achieve its outcomes; unintended consequences that could arise from its implementation; and possible corrective actions that could be taken to address these potential risks.

9.1.2 Organisations that have developed similar international standards shall be informed of SBP's intention to develop sustainability standards. These bodies shall be requested to provide input on the ToR and encouraged to participate in the document development.

9.1.3 The ToR shall be presented to the Standards Committee, Technical Committee and Stakeholder Advisory Group for review and comment, prior to proceeding with the development of the sustainability standard.

### 9.2 Engagement of stakeholders in the development process

9.2.1 The decision to develop a sustainability standard along with the ToR shall be officially announced and made publicly available on the SBP website.

9.2.2 The announcement shall include a Public Summary of the process including:

- i. A summary of the TOR for the sustainability standard, including the proposed scope, objectives and justification of the need for the standard development;
- ii. Steps in the standard-setting process, including timelines and clearly identified opportunities for contributing; and
- iii. Decision-making procedures, including how decisions are made and who makes them.

9.2.3 The Secretariat shall seek advice from the Stakeholder Advisory Group on the content of the draft sustainability standard and in identifying stakeholders.

9.2.4 The Secretariat will establish a Working Group, comprising subject matter experts, to develop the technical content of the sustainability standards.

9.2.5 The Working Group will make decisions, including on the Working Group outputs (e.g. a draft sustainability standard) and recommendations based on consensus. Where consensus cannot be achieved the Working Group will notify the Secretariat.

9.2.6 The Secretariat shall present the draft sustainability standard to the Technical Committee and to the Standards Committee for review and comment.

### 9.3 Public consultation

9.3.1 The Secretariat shall announce a Public Consultation and provide the draft sustainability standard, Public Summary and ToR via email communication and publish these on the SBP website.

9.3.2 The Public Consultation shall be open to all stakeholders and shall aim to achieve a balance of interests in the subject matter and in the geographic scope to which the standard applies.

9.3.3 Stakeholders shall be proactively contacted to contribute to the public consultation, in particular those who are typically under-represented and those who will be directly affected or disadvantaged by any change.

9.3.4 Engagement shall provide stakeholders with appropriate opportunities to contribute to the development of the sustainability standard. This shall include appropriate mechanisms and tools for engagement.

9.3.5 Organisations that have developed related standards shall be encouraged to participate.

9.3.6 For revising existing sustainability standards (category 1) there shall be at least one round of 60 days for public consultation.

9.3.7 There shall be two rounds of public consultation for developing new sustainability standards. The first consultation period shall last at least 60 days and the second consultation period shall be subsequent to the first consultation and last at least 30 days.

9.3.8 Where substantive, unresolved issues persist after consultation, or where insufficient feedback was received, the Secretariat shall carry out additional rounds of consultation as necessary.

9.3.9 After each consultation, the Secretariat shall prepare a synopsis including a summary of the comments received and details of how these have been taken into account.

9.3.10 Original unattributed comments shall be appended to the synopsis. Original comments that are made publicly available can be attributed to the stakeholder group but should not be attributed to individual stakeholders unless those stakeholders have consented to be identified.

9.3.11 The synopsis shall be made publicly available and sent to all stakeholders who submitted comments.

## 9.4 Piloting

9.4.1 The Secretariat shall test through piloting the impact and applicability of the draft sustainability standard.

9.4.2 The piloting should be developed with the following objectives:

- i. Validating if the presumed outcomes of the sustainability standard can be achieved; and
- ii. Testing the sustainability standard's feasibility, applicability, and auditability.

## 9.5 Approval of final draft

9.5.1 The Secretariat shall present the stakeholder consultation synopsis, results of piloting and other relevant documents to the Working Group for a recommendation on how to proceed.

9.5.2 The Secretariat shall present the final draft standard, and any documents or records required to demonstrate compliance with this procedure, including the recommendation of the Working Group, to the Technical Committee for review and comment.

9.5.3 The Secretariat shall present the final draft standard, and any documents or records required to demonstrate compliance with this procedure, including the recommendation of the Working Group and comments of the Technical Committee to the Standards Committee for review and consideration for approval.

9.5.4 The Standards Committee's approval shall include consideration that the requirements of both this procedure, and the ISEAL Code of Good Practice for Setting Social and Environmental Standards have been met.

9.5.5 The Board shall be notified of the Standards Committee's decision.

9.5.6 Once approved by the Standards Committee the Secretariat shall promptly announce the new standard via email to stakeholders including Certification Bodies and it shall be free and made publicly available on the SBP website in electronic format.

## 10 Document development process of Category 2 documents (standards other than sustainability standards)

10.1 The process is as given under section 9, except that the requirements for Terms of Reference (9.1), advice on content and stakeholders (9.2.3), establishment of Working Group (9.2.4), public consultation (9.3) and piloting (9.4) should be implemented where appropriate.

## 11 Document development process of Category 3 documents (normative documents other than standards)

11.1 Documents shall be drafted by the Secretariat in consultation with relevant stakeholders and where appropriate through the establishment of Working Groups.

11.2 Documents shall be recommended for approval by the Technical Committee and approved by the Chief Technical Officer (CTO) or Chief Executive Officer (CEO).

11.3 The Secretariat shall promptly announce the new documents via email to stakeholders and publish it on the SBP website.

## 12 Document development process of Category 4 documents (other documents)

12.1 These documents shall be developed by the Secretariat and shall be approved by the Chief Technical Officer (CTO) or Chief Executive Officer (CEO).

12.2 Where it is appropriate to make documents externally available the Secretariat shall promptly announce the new documents via email to stakeholders and publish it on the SBP website.