Standards Development Process: Stakeholder Survey Results
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1 Introduction

A stakeholder survey was conducted between 3 and 14 February 2020. An email was sent out to stakeholders in the Sustainable Biomass Program community, such as Certificate Holders, Certification Bodies and members of committees and working groups.

Stakeholders were provided with two formats for providing feedback. Firstly, they were provided with a simple Excel spreadsheet to provide feedback and ideas on specific clauses of the current standards. Secondly stakeholders were invited to complete a SBP Standards Development online survey https://www.surveymonkey.co.uk/r/SBPStandards, which picked up some specific themes.

The results of the survey have been aggregated and are not attributable to any specific organisation or individual. Stakeholders were given the opportunity to remain anonymous.

Topics included:

- Key issues for consideration related to the SBP certification system and standards;
- Comments on Standard 1 criteria;
- Comments on Standards 2 to 6 criteria;
- Views on the priority of different sustainability issues;
- Views on the equivalence of other certification systems, compared to SBP; and
- Any other comments, for example, views on expanding the geography of the system, for example into South East Asia.

A total of 23 stakeholders responded to the online survey, four stakeholders sent an Excel-based response and a further eight stakeholders provided comments by email or in person.

These are captured below. A ‘Comment ID’ has been allocated to each response, to ensure it is possible to manage and track responses.
2 Responses to online survey

Q1: Should SBP Standard 1: Feedstock Compliance Standard and SBP Standard 2: Verification of SBP-compliant Feedstock be consolidated into one standard? For more information about the Standards visit SBP's website.

<table>
<thead>
<tr>
<th>Comment ID</th>
<th>Agreement</th>
<th>Comment</th>
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</thead>
<tbody>
<tr>
<td>1</td>
<td>Neutral</td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>Yes – agree</td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>Yes - strongly agree</td>
<td></td>
</tr>
<tr>
<td>4</td>
<td>No - disagree</td>
<td></td>
</tr>
<tr>
<td>5</td>
<td>No - disagree</td>
<td>It would be a wrong priority to consolidate the two standards, when the real challenge is in revising ST 1 and providing more guidance and clarity around concepts in ST 1. ST 2 has its own challenges and needs work. Keeping the two separate would also reflect reality of some BPs not being certified to ST 1.</td>
</tr>
<tr>
<td>6</td>
<td>Yes – agree</td>
<td></td>
</tr>
<tr>
<td>7</td>
<td>Neutral</td>
<td></td>
</tr>
<tr>
<td>8</td>
<td>Yes - strongly agree</td>
<td>They are essentially the same already, one is content driven and two is implementation driven, with only a few deviations. Including them into one standard will make it easier for new stakeholders to understand and make it easier to implement for certificate holders.</td>
</tr>
<tr>
<td>9</td>
<td>Neutral</td>
<td></td>
</tr>
<tr>
<td>10</td>
<td>No - disagree</td>
<td></td>
</tr>
<tr>
<td>11</td>
<td>No - strongly disagree</td>
<td>Combining the two would introduce confusion for BPs using approved schemes (FSC/ PEFC/ SFI) to produce SBP compliant biomass.</td>
</tr>
<tr>
<td>12</td>
<td>Neutral</td>
<td>Some elements overlap. Reason for integration. The nature of quite some Criteria in standard 1 (mainly SFM criteria) are of a different nature from standard 2 (requirements for a Supply Base).</td>
</tr>
<tr>
<td>13</td>
<td>No - disagree</td>
<td></td>
</tr>
<tr>
<td>14</td>
<td>Yes – agree</td>
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</tr>
<tr>
<td>15</td>
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<td></td>
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<tr>
<td>16</td>
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<tr>
<td>17</td>
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<td></td>
</tr>
<tr>
<td>18</td>
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<td></td>
</tr>
<tr>
<td>19</td>
<td>No - disagree</td>
<td></td>
</tr>
<tr>
<td>20</td>
<td>Yes – agree</td>
<td></td>
</tr>
<tr>
<td>21</td>
<td>Neutral</td>
<td></td>
</tr>
</tbody>
</table>

Q2: Should SBP Standard 3: Certification Systems. Requirements for Certification Bodies and SBP Standard 4: Chain of Custody be consolidated into one standard? For more information about the Standards visit SBP's website.

<table>
<thead>
<tr>
<th>Comment ID</th>
<th>Agreement</th>
<th>Comment</th>
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<tbody>
<tr>
<td>133</td>
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<td></td>
</tr>
<tr>
<td>134</td>
<td>Yes – agree</td>
<td></td>
</tr>
<tr>
<td>135</td>
<td>No - strongly disagree</td>
<td>Suggest custom SBP CoC standard is rolled out. There is enough confusion with various levels of requirements and</td>
</tr>
</tbody>
</table>
also the crucial CoC controls for various markets call for a standalone, detailed standard and guidance.

136 No - disagree

137 No - strongly disagree

138 Neutral

139 No - disagree

140 No - disagree

141 Neutral

142 Yes – agree

143 No - strongly disagree

144 No - strongly disagree

145 No - strongly disagree

146 No - disagree

147 No - disagree

148 No - disagree

149 No - disagree

150 No - disagree

151 Neutral

152 Neutral

153 No - disagree

154 Neutral


<table>
<thead>
<tr>
<th>Comment ID</th>
<th>Agreement</th>
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<tbody>
<tr>
<td>168</td>
<td>Yes – agree</td>
<td></td>
</tr>
<tr>
<td>169</td>
<td>Yes - agree</td>
<td></td>
</tr>
<tr>
<td>170</td>
<td>Yes - strongly agree</td>
<td></td>
</tr>
<tr>
<td>171</td>
<td>Yes - agree</td>
<td></td>
</tr>
<tr>
<td>172</td>
<td>Yes - strongly agree</td>
<td>Unless the standard is filled with any meaningful requirements, it is unnecessary.</td>
</tr>
<tr>
<td>173</td>
<td>Neutral</td>
<td></td>
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<td>174</td>
<td>Neutral</td>
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<td>175</td>
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<tr>
<td>176</td>
<td>Yes - agree</td>
<td></td>
</tr>
<tr>
<td>177</td>
<td>Yes - agree</td>
<td></td>
</tr>
<tr>
<td>178</td>
<td>Yes - agree</td>
<td>We are not aware of any certificate holder using this standard either currently or in the past. While we recall comments from SBP and Engie throughout 2019 that the standard would soon become relevant due to of forthcoming changes to the Belgian regulatory requirements, this does not seem to have moved forward.</td>
</tr>
</tbody>
</table>
Overall, our feeling is that the existence and use of this standard should follow end users’ regulatory reporting needs, and that a single approach to GHG calculations would likely only be feasible if/when all regulators across all markets get aligned on using the same calculation methodology and default/reference values. Further to that, we do not believe there is much potential for this standard to provide communications or transparency benefits for certificate holders (separate from its use as a regulatory reporting support tool) because the results would almost certainly be different from end users’ regulatory calculations. This would introduce inconsistency and therefore risky confusion on a topic that is difficult for non-SMEs to understand. For example, a UK generator would likely not want a separate set of SBP-dictated, BP/CB-generated GHG calculations floating around our industry’s various communications channels and networks.

<table>
<thead>
<tr>
<th>179</th>
<th>Yes - agree</th>
<th>I do not see what it adds to the requirements of standard 5.</th>
</tr>
</thead>
<tbody>
<tr>
<td>180</td>
<td>Yes - agree</td>
<td></td>
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<tr>
<td>181</td>
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<tr>
<td>182</td>
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<tr>
<td>183</td>
<td>Yes - agree</td>
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<tr>
<td>184</td>
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<td></td>
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<tr>
<td>185</td>
<td>Neutral</td>
<td></td>
</tr>
<tr>
<td>186</td>
<td>No - strongly disagree</td>
<td></td>
</tr>
<tr>
<td>187</td>
<td>Yes - agree</td>
<td>I am not aware of this standard being used across the industry, so would suggest that it is not useful for most SBP certificate holders.</td>
</tr>
<tr>
<td>188</td>
<td>Yes - agree</td>
<td></td>
</tr>
<tr>
<td>197</td>
<td>No information</td>
<td>I think it is appropriate.</td>
</tr>
<tr>
<td>198</td>
<td>No information</td>
<td>The scope should be reflective of the BP's sourcing area.</td>
</tr>
<tr>
<td>199</td>
<td>No information</td>
<td>Do not move away from risk-based approach based on geographic bounds defined at a high enough level so that BPs can collect and use reputable publicly available data to conduct their risk assessments and characterise their supply base.</td>
</tr>
<tr>
<td>200</td>
<td>No information</td>
<td>The unit is all right for me, but the place of harvesting needs guidance. For example with the present formulation a geographical area could be the place of harvesting or a specific section in a FMU.</td>
</tr>
<tr>
<td>201</td>
<td>No information</td>
<td>I would keep it as a very &quot;flexible&quot; concept. Depending on scale of analysis of each indicator, the unit level could be an eco-region, or an Forest Management Unit (as FSC).</td>
</tr>
<tr>
<td>202</td>
<td>No information</td>
<td>I think that Supply Base area works very well - and was incorporated into the thinking in RED II. Keep it as it is... however, I would suggest that there may need to be some additional work needed to ensure that BP's don't unintentionally stray outside of their supply base area.</td>
</tr>
<tr>
<td>203</td>
<td>No information</td>
<td>A regional approach should be considered.</td>
</tr>
</tbody>
</table>
Q4: Please insert any comments you have about the geographical scope of the SBP certification unit level. For example, whether you feel that the certification unit should be redefined and if so in what way. Some stakeholders have noted that other certification schemes certificate scope may focus on a Defined Forest Area (as is the case with CSA), or a Forest Management Enterprise (FSC).

<table>
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<tr>
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<tr>
<td>197</td>
<td>No information</td>
<td>I think it is appropriate.</td>
</tr>
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<tr>
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<td>I think that Supply Base area works very well - and was incorporated into the thinking in RED II. Keep it as it is... however, I would suggest that there may need to be some additional work needed to ensure that BP's don't unintentionally stray outside of their supply base area.</td>
</tr>
<tr>
<td>203</td>
<td>No information</td>
<td>A regional approach should be considered</td>
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</table>

Q5: Should we include participatory monitoring as part of the standards? For example, working with local communities to monitor species changes.

<table>
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<tr>
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<th>Agreement</th>
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<tbody>
<tr>
<td>232</td>
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<tr>
<td>233</td>
<td>No - disagree</td>
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<td>234</td>
<td>No - disagree</td>
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<td>235</td>
<td>No - disagree</td>
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<td>236</td>
<td>Yes - agree</td>
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<td>249</td>
<td>No - disagree</td>
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<tr>
<td>250</td>
<td>No - disagree</td>
</tr>
<tr>
<td>251</td>
<td>Yes - agree</td>
</tr>
</tbody>
</table>
Q6: Should SBP’s Sustainability Standards (currently Standard 1 and 2) include process based indicators, outcome based indicators, or both? Process based indicators directly measure the success of key performance processes. For example, “a control system is in place to verify that feedstock is sourced from forests with appropriate management systems to maintain ecosystem function.” Outcome based indicators measure changes in specific characteristics. For example, populations of locally agreed indicator species.

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<th>Agreement</th>
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<tbody>
<tr>
<td>256</td>
<td>No - disagree</td>
<td></td>
</tr>
<tr>
<td>257</td>
<td>Neutral</td>
<td>This question does not appear to be worded in a way which can be answered effectively by selecting one of the above &quot;boxes&quot; because it asks for a preference between the methods. I believe that Process based indicators are appropriate rather than outcome based. For example, it is appropriate for a BP to put processes in place to guard against a reduction in species diversity based on their own sourcing behaviour. It is not reasonable to ask for outcome based biodiversity metrics and then use these metrics to judge BP performance because there are many factors at play in the landscape and it is unreasonable to expect a BP to be responsible for a change, positive or negative. They can, however, demonstrate their own program to contribute to the protection of biodiversity and specific actions that they have taken...</td>
</tr>
<tr>
<td>258</td>
<td>Yes - agree</td>
<td>Where possible.</td>
</tr>
<tr>
<td>259</td>
<td>No - disagree</td>
<td></td>
</tr>
<tr>
<td>260</td>
<td>Neutral</td>
<td>The answers do not match the question. The question asks to choose between three options, but the answers are only an indication of general agreement or disagreement, but to what? I put neutral since I think whatever SBP decides, clear guidance, unambiguous concepts and indicators need to be produced to leave as little room as possible for interpretation.</td>
</tr>
<tr>
<td>261</td>
<td>Neutral</td>
<td></td>
</tr>
<tr>
<td>262</td>
<td>Yes - agree</td>
<td></td>
</tr>
<tr>
<td>263</td>
<td>No information</td>
<td>Both, but heavier towards outcome based. Since biomass is not driving changes to forests in many areas, it makes sense to incorporate outcomes rather than process. The outcomes may change over time due to activities beyond the BP's control i.e. activities by forest managers, disease, natural disturbance - outcome based indicators will ensure the BP's respond to those changes.</td>
</tr>
<tr>
<td>264</td>
<td>No - disagree</td>
<td></td>
</tr>
<tr>
<td>265</td>
<td>Neutral</td>
<td></td>
</tr>
<tr>
<td>266</td>
<td>Neutral</td>
<td>This is a multiple choice question and cannot be answered using a Likert scale, and so while we selected “Neutral” as our response, our firm preference is for PROCESS based indicators. In most cases, biomass markets represent a very small part of a larger, integrated forest products industry. Our industry is limited in its ability to solely drive outcomes across the forest.</td>
</tr>
</tbody>
</table>
landscape, as there are a large number and wide variety of forestry and other industry and public actors that affect land management and harvesting decisions. Transitioning to outcome based indicators risks introducing a level of detail that could be difficult to measure and for which BPs may have little influence.

| 267 | Yes - agree | Both. It is common practice that besides process indicators outcome indicators are used. Process indicators can be considered as proxies for outcome indicators. They are useful where outcome indicators are difficult to formulate and/or to measure. But outcome indicators are the real proof of SFM. |
| 268 | No - disagree | |
| 269 | Neutral | |
| 270 | No - disagree | I think it would be an insurmountable hurdle for pellet plants to measure outcomes. However, I do believe SBP should measure outcomes. |
| 271 | No information | |
| 272 | No - disagree | |
| 273 | Yes - strongly agree | It should include both types of indicators, since they are complementary. |
| 274 | Neutral | |
| 275 | No information | Q6 cannot be answered with the listed responses. Overall, process based indicators appear to be controllable by the participant, whereas outcome based indicators can be influenced by processes or activities beyond the participant's control. E.g., climate change, catastrophic events. |
| 276 | Neutral | I think SBP should use both - it may be tricky for an auditor to assess outcome based indicators for some criteria. |
| 277 | Yes - agree | Both. |

Q7: Training and Education is one of the 14 principles for responsible forestry in the SFI 2010-2014 Standard. Program participants must make sure their staff and contractors are properly trained, and they must be part of a local SFI Implementation Committee to improve training. If they source fibre from uncertified lands, they must encourage the landowner to use qualified professionals. In 2018, 96% of all fibre supplied to SFI Program Participant mills was delivered by trained harvesting professionals. There is clear evidence that improved understanding of sustainable forest practice requirements delivered by SFI implementation committees has led to improved outcomes in forest lands; for example through improved water quality. Should promoting research, training and education become an element of the SBP scheme? For example: Training forest workers; Training workers within the biomass processing supply chain; and/or Working with research institutions to build knowledge within the sector.

No response
Q8: Should we publish a global map identifying the Supply Base of certificate holders? For example, see RSPO's recent publication of RSPO members' oil palm concession maps for Peninsular Malaysia and Sarawak on its interactive map application GeoRSPO - a milestone set to deliver greater transparency to the sustainable palm oil sector.

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<tbody>
<tr>
<td>298</td>
<td>Yes – agree</td>
<td></td>
</tr>
<tr>
<td>299</td>
<td>No - disagree</td>
<td>I do not think that this will necessarily help the industry, or the perception of the industry.</td>
</tr>
<tr>
<td>300</td>
<td>Yes - strongly agree</td>
<td></td>
</tr>
<tr>
<td>301</td>
<td>No - disagree</td>
<td></td>
</tr>
<tr>
<td>302</td>
<td>Yes - agree</td>
<td></td>
</tr>
<tr>
<td>303</td>
<td>Yes - agree</td>
<td></td>
</tr>
<tr>
<td>304</td>
<td>Yes - agree</td>
<td></td>
</tr>
<tr>
<td>305</td>
<td>No - strongly disagree</td>
<td>What purpose would this serve?</td>
</tr>
<tr>
<td>306</td>
<td>Yes - strongly agree</td>
<td></td>
</tr>
<tr>
<td>307</td>
<td>Neutral</td>
<td></td>
</tr>
<tr>
<td>308</td>
<td>Yes - strongly agree</td>
<td>An initiative like this one is a great opportunity for SBP to be front-footed in terms of promoting transparency in biomass supply chains and would also be of value to current certificate holders and other SBP stakeholders.</td>
</tr>
<tr>
<td>309</td>
<td>Yes - agree</td>
<td>The requirement is useful in cases where the SBR is not defined by the geographical borders of one or more countries.</td>
</tr>
<tr>
<td>310</td>
<td>Neutral</td>
<td></td>
</tr>
<tr>
<td>311</td>
<td>Yes - agree</td>
<td></td>
</tr>
<tr>
<td>312</td>
<td>Neutral</td>
<td></td>
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<tr>
<td>313</td>
<td>No - disagree</td>
<td></td>
</tr>
<tr>
<td>314</td>
<td>Neutral</td>
<td></td>
</tr>
<tr>
<td>315</td>
<td>Yes - strongly agree</td>
<td></td>
</tr>
<tr>
<td>316</td>
<td>Yes - strongly agree</td>
<td></td>
</tr>
<tr>
<td>317</td>
<td>No information</td>
<td>For Q 7 above, the SBP should have a conversation about landowner and public outreach as well.</td>
</tr>
<tr>
<td>318</td>
<td>No - disagree</td>
<td>I think SBP already has very good levels on transparency about their certificate holders. This could be helpful, but I think you would need to include the biodiverse or sensitive areas that are avoided by each BP, otherwise it could be wilfully misinterpreted.</td>
</tr>
<tr>
<td>319</td>
<td>Yes - agree</td>
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Q9: Should we publish aggregated data that we collect through the scheme to inform the debate on sustainable biomass? For example, sharing aggregated data about feedstock types and trade flows.

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<th>Agreement</th>
<th>Comment</th>
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</thead>
<tbody>
<tr>
<td>576</td>
<td>Yes - agree</td>
<td></td>
</tr>
<tr>
<td>577</td>
<td>Yes - agree</td>
<td>This is done by SFI and is useful for informing the public about the positive impact of forest certification. If SBP uses this interaction and communication as a model it may be beneficial.</td>
</tr>
<tr>
<td>578</td>
<td>Yes - strongly agree</td>
<td>Can't agree stronger!</td>
</tr>
<tr>
<td>579</td>
<td>Neutral</td>
<td></td>
</tr>
</tbody>
</table>
Q10: Should we require that certification bodies and lead auditors are rotated regularly to reduce the risks of conflicts of interest in auditing? Rotation of certification body, lead auditor and technical experts could be used to reduce risks related to impartiality in auditing. This could, for example, mean changing the certification body and/or the lead auditor regularly, probably every three years.

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</thead>
<tbody>
<tr>
<td>23</td>
<td>Yes - agree</td>
<td>There is real difficulty with CB efficiency right now and introducing a requirement to change CBs would likely cause more harm than good. This is a new industry and requires some specialised skills and experience to properly audit. If there is a concern about conflicts of interest this should be a required training focus within the CBs and an expectation for accreditation to the SBP Standard.</td>
</tr>
<tr>
<td>24</td>
<td>No - disagree</td>
<td>Yes, SBP has the best dataset on sustainability of woody biomass and could make a strong contribution.</td>
</tr>
</tbody>
</table>

580  Yes - agree
581  Yes - agree
582  Neutral
583  Yes - agree
584  Neutral
585  Neutral
586  Yes - agree
587  Neutral
588  Yes - agree
589  Yes - agree
590  Yes - agree
591  No - disagree
592  Yes - strongly agree
593  Yes - strongly agree
594  Neutral
595  Yes - strongly agree
596  Yes - agree

General data on feedstock types would not be controversial, but BP specific data on feedstock types could be an issue.

Depending on what statistics are selected for publication, an initiative like this one could be a great opportunity for SBP to be front-footed in terms of promoting transparency in biomass supply chains and could also be of value to current certificate holders and other SBP stakeholders.

I think there could be some very powerful analysis done with the data pellet mills supply, however it is essential to publish the data carefully and ensure that pellet mills feel in control of their data.

I don't see the value in the collection of this data. I think SBP should require an annual survey of members to aggregate data on accomplishments similar to SFI and publish in the annual report. See SFI Annual Report.

Use of biomass is becoming controversial because of the carbon footprint. So we need more transparency and aggregated data in order to promote an open and honest discussion.
<table>
<thead>
<tr>
<th>No.</th>
<th>Response</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>26</td>
<td>No - strongly disagree</td>
<td>Agree to auditor rotation, which is already common practice and also required by other forestry programs. It is the responsibility of the accreditation body to reduce risk and ensure consistency across certification bodies. It is the certificate holder's choice with whom they enter into business. The process of switching certification bodies might provide benefits to the credibility of the scheme. But the associated costs of having limited resources tied up in regular transfer processes outweigh the benefits. What if a certain CB operates in a country where no other CB has auditor capacity? Who determines the CB that is next in the rotation?</td>
</tr>
<tr>
<td>27</td>
<td>No - strongly disagree</td>
<td>SBP is complex, new auditors take time to understand the company specific procedures. This is a time and energy cost to the BP. If standard 3 is strong then it should not matter if it is the same auditor.</td>
</tr>
<tr>
<td>28</td>
<td>No - disagree</td>
<td></td>
</tr>
<tr>
<td>29</td>
<td>Yes - agree</td>
<td></td>
</tr>
<tr>
<td>30</td>
<td>No - strongly disagree</td>
<td></td>
</tr>
<tr>
<td>31</td>
<td>Neutral</td>
<td>We have different responses to these two questions, and so we responded &quot;Neutral.&quot; We are supportive of rotating lead auditors (this is actually already required by traditional forestry certification systems,) but not CBs. There are not many CBs to choose from, and as a BP with such a large number of certificate-holding entities, we have had issues in the past with finding a CB partner who had the resources and capabilities to effectively meet our annual audit program needs.</td>
</tr>
<tr>
<td>32</td>
<td>No - strongly disagree</td>
<td></td>
</tr>
<tr>
<td>33</td>
<td>Neutral</td>
<td></td>
</tr>
<tr>
<td>34</td>
<td>Yes - agree</td>
<td>Yes, not only to prevent partiality but also to avoid a less critical approach.</td>
</tr>
<tr>
<td>35</td>
<td>No - disagree</td>
<td></td>
</tr>
<tr>
<td>36</td>
<td>No - disagree</td>
<td></td>
</tr>
<tr>
<td>37</td>
<td>Neutral</td>
<td></td>
</tr>
<tr>
<td>38</td>
<td>No - strongly disagree</td>
<td>This idea defeats the entire purpose of accreditation and gets far too deep in the business of the BP's. Changing CB's is a costly and time consuming process. I don't have a problem with changing the lead auditor for one audit every 5 years or so. SBP is a very low profit operation for CBs. Requiring rotation will only lead to less CBs being interested in working with SBP. The number interested is already frighteningly low. Let the free market process work and don't make it socialist.</td>
</tr>
<tr>
<td>39</td>
<td>No - disagree</td>
<td></td>
</tr>
<tr>
<td>40</td>
<td>Yes - agree</td>
<td></td>
</tr>
<tr>
<td>41</td>
<td>Yes - agree</td>
<td></td>
</tr>
<tr>
<td>42</td>
<td>No - strongly disagree</td>
<td></td>
</tr>
<tr>
<td>43</td>
<td>Yes - strongly agree</td>
<td>Agree. We also need to focus on getting more CBs - NEPCon currently has a very dominant position in a lot of areas.</td>
</tr>
</tbody>
</table>
Q11: Should we identify options to strengthen the objectivity and integrity of audits? For example, an escrow fund to delink the financial dependency of Certification Bodies from their clients.

<table>
<thead>
<tr>
<th>Comment ID</th>
<th>Agreement</th>
<th>Comment</th>
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</thead>
<tbody>
<tr>
<td>44</td>
<td>Yes - agree</td>
<td>Unless it presents a financial hardship for the entity.</td>
</tr>
<tr>
<td>45</td>
<td>Neutral</td>
<td></td>
</tr>
<tr>
<td>46</td>
<td>No - disagree</td>
<td>I do not think this is necessary.</td>
</tr>
<tr>
<td>47</td>
<td>Neutral</td>
<td>Geographical monopoly of CBs and the limited number of accredited CBs is a risk to consider and should be focused on as priority.</td>
</tr>
<tr>
<td>48</td>
<td>Yes - agree</td>
<td></td>
</tr>
<tr>
<td>49</td>
<td>No - strongly disagree</td>
<td>Other environmental certification schemes are operating under the current model, why do we need to make a fundamental change to that?</td>
</tr>
<tr>
<td>50</td>
<td>Neutral</td>
<td></td>
</tr>
<tr>
<td>51</td>
<td>Yes - strongly agree</td>
<td>Wouldn't necessarily focus on cost, maybe additional criteria around audit scoping would help to bolster the audit process.</td>
</tr>
<tr>
<td>52</td>
<td>Neutral</td>
<td></td>
</tr>
<tr>
<td>53</td>
<td>Neutral</td>
<td></td>
</tr>
<tr>
<td>54</td>
<td>Yes - agree</td>
<td></td>
</tr>
<tr>
<td>55</td>
<td>Yes - agree</td>
<td>CBs are best poised to offer suggestions in this area. However, the example provided here does not seem like an effective option, as regardless of whether the BP is paying the CB directly or not, the BP is paying and also making the decision on whether or not to work with a certain CB. Accreditation bodies, such as ASI, are still the best controls in this system.</td>
</tr>
<tr>
<td>56</td>
<td>Yes - agree</td>
<td>Although I have no evidence of the impact of financial dependency, it is obvious that there may be a perverse incentive.</td>
</tr>
<tr>
<td>57</td>
<td>Yes - agree</td>
<td></td>
</tr>
<tr>
<td>58</td>
<td>No - disagree</td>
<td></td>
</tr>
<tr>
<td>59</td>
<td>Neutral</td>
<td></td>
</tr>
<tr>
<td>60</td>
<td>No - strongly disagree</td>
<td>Again, if we can't trust CB's and auditors we are in very dire straits. BAD IDEA!</td>
</tr>
<tr>
<td>61</td>
<td>No - disagree</td>
<td></td>
</tr>
<tr>
<td>62</td>
<td>Neutral</td>
<td></td>
</tr>
<tr>
<td>63</td>
<td>Neutral</td>
<td></td>
</tr>
<tr>
<td>64</td>
<td>No - disagree</td>
<td></td>
</tr>
<tr>
<td>65</td>
<td>Neutral</td>
<td>Not sure - would defer to ASI on this.</td>
</tr>
<tr>
<td>66</td>
<td>No - disagree</td>
<td></td>
</tr>
</tbody>
</table>
Q12: Please insert any comments you have about risks SBP may face in the Standard achieving the desired and intended outcomes. For example: Cost for demonstrating compliance with sustainability requirements becomes a barrier to SBP certification such that biomass which is in fact sustainable is excluded from the supply chain; Gaps or weaknesses in the system allowing unsustainable biomass to enter the system; Climate change may affect production and long-term resilience; Failure of SBP to meet regulators’ definitions of biomass sustainability; Changes in regulation, leading to lack of market uptake; and Significant NGO/social media campaign against the scheme, leading to a lack of market uptake.

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<thead>
<tr>
<th>Comment ID</th>
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<th>Comment</th>
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</thead>
<tbody>
<tr>
<td>67</td>
<td>No information</td>
<td>Right now SBP is taking an appropriate regional risk based approach. There are a lot of mechanisms supporting and ensuring the sustainability and legality of the forest industry in the US and Canada. Danger would be that SBP would choose to veer away from the regional risk based approach and place unnecessary requirements on BPs which would then be relayed to suppliers. Suppliers have choices of where to sell their products (residuals and Roundwood) and if SBP were to take too extreme of an approach (one that discounts the effectiveness of current regulation and safeguards) BPs may lose truly sustainable supply streams and SBP would not be achieving its desired outcome.</td>
</tr>
<tr>
<td>68</td>
<td>No information</td>
<td>Gaps: * reliance on other CoC without detailed guidance * variable approach to mass balance and sustainability characteristics</td>
</tr>
<tr>
<td>69</td>
<td>No information</td>
<td>Cost for demonstrating compliance with sustainability requirements becomes a barrier to SBP certification such that biomass which is in fact sustainable is excluded from the supply chain;</td>
</tr>
<tr>
<td>70</td>
<td>No information</td>
<td>The member states deviate so far from SBP it become irrelevant. i.e. easier to obtain subsidy directly through B2B transaction rather than using SBP</td>
</tr>
<tr>
<td>71</td>
<td>No information</td>
<td>This a very open question - risks given as examples are all relevant. There is a risk that regulatory regimes becoming increasingly diverse in their requirements and that SBP becomes too complicated as it attempts to meet a variety of regimes- in effect what we have seen with the Netherlands. The way to mitigate this is early engagement in emerging markets like Japan in order to get SBP approved as a voluntary scheme for demonstrating adherence to the FiT sustainability requirements.</td>
</tr>
<tr>
<td>72</td>
<td>No information</td>
<td>Failure of SBP to meet regulators’ definitions of biomass sustainability; Changes in regulation, leading to lack of market uptake; and Significant NGO/social media campaign against the scheme, leading to a lack of market uptake.</td>
</tr>
<tr>
<td>73</td>
<td>No information</td>
<td>Overwhelming stakeholder input clogs the process because there are not resources to respond to all.</td>
</tr>
<tr>
<td>74</td>
<td>No information</td>
<td>Cost for demonstrating compliance with sustainability requirements becomes a barrier to SBP certification such that biomass which is in fact sustainable is excluded from the supply chain.</td>
</tr>
<tr>
<td>75</td>
<td>No information</td>
<td>Significant NGO/social media campaign against the scheme, leading to a lack of market uptake.</td>
</tr>
</tbody>
</table>
SBP should develop specific requirements for energetic plantations. They are becoming very controversial.

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<tbody>
<tr>
<td>76</td>
<td>No information</td>
<td>Hampering the opportunity of sustainable biomass to flow through the system due to the lack of acceptance of verifiable certification systems - i.e. SFI.</td>
</tr>
<tr>
<td>77</td>
<td>No information</td>
<td>SBP uses a supply base approach, which is great, but there is the potential for bad actors operating in good areas. i.e. if the regional data shows positive trends, it could mask poor behaviour from the BP. this could perhaps be addressed by the CB carrying out some spot checks or additional questions on areas which are deemed low risk on a regional basis.</td>
</tr>
<tr>
<td>78</td>
<td>No information</td>
<td>Cost for demonstrating compliance. How might we encourage or support the use of public lands without certification schemes.</td>
</tr>
</tbody>
</table>

Q13: Please insert any comments you have about possible unintended consequences of implementation of Standard 1 and 2. This may include a broad range of issues, including for example: Compliance costs and complexity too high for some new target certificate holders; Lowered income of certificate holders due to lowered productivity or limited expansion; and Increase in primary feedstock demand.

<table>
<thead>
<tr>
<th>Comment ID</th>
<th>Agreement</th>
<th>Comment</th>
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</thead>
<tbody>
<tr>
<td>79</td>
<td>No information</td>
<td>See response to #12</td>
</tr>
<tr>
<td>80</td>
<td>No information</td>
<td>* Certification of &quot;wannabe&quot; traders</td>
</tr>
<tr>
<td>81</td>
<td>No information</td>
<td>Increase in primary feedstock demand.</td>
</tr>
<tr>
<td>82</td>
<td>No information</td>
<td>1. Resource intensive for BP's to prove compliance; 2. SBP is not a FM standard, although STD 1 and 2 imply that it is; 3. redundant with other FM schemes.</td>
</tr>
<tr>
<td>83</td>
<td>No information</td>
<td>Again, this is a very open question and all of these examples are relevant.</td>
</tr>
<tr>
<td>84</td>
<td>No information</td>
<td>All of the above. SBP is a minuscule portion of overall fiber demand. Any increased requirements over and above regulatory requirements decreases BP's ability to operate in the market.</td>
</tr>
<tr>
<td>85</td>
<td>No information</td>
<td>Too complex and limits the supply base.</td>
</tr>
</tbody>
</table>

Q14: If you have any comments on changes to Standard 1 criteria, please select a criterion from the dropdown and enter the issue or proposed change description.

<table>
<thead>
<tr>
<th>Comment ID</th>
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<th>Comment</th>
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<tbody>
<tr>
<td>86</td>
<td>No information</td>
<td>1.1: Supply Base is defined. There seems to be inconsistencies between how Standard 1, 2, and 4 treat material originating outside of the supply base. Standard 1 (1.1.1) states that certain feedstocks can come in from outside the supply area as long as they follow the CoC standard (Standard 4): &quot;The requirement relates to feedstock included in the SBE. Certain feedstocks from outside the SB may be used in SBP certified biomass so long as they meet all requirements (see CoC Standard).&quot; Standard 4 then states that &quot;Feedstock received with an SBP-approved Forest Management Scheme Claim or...</td>
</tr>
</tbody>
</table>
SBP-approved recycled claim." is compliant and "Feedstock received with an SBP-approved -controlled feedstock systems claim." is considered Controlled. In both cases Standard 4 does not state that the material with these claims needs to be in the defined supply base. However, according to Standard 2, it appears that ALL feedstock must originate from a pre-defined supply base. Section 5: “The BP shall define the Supply Base (SB) for all feedstock received which is used in the production of SBP compliant biomass.” and “6.3 The BP shall ensure that the place of harvesting is within the defined SB.” These inconsistencies need to be cleared up so it is clear if it is possible for material to enter from outside the supply base IF it carries the appropriate claim as specified in Standard 4.

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<tr>
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<tbody>
<tr>
<td>88</td>
<td>No information</td>
<td>1.6: Harvesting does not violate traditional or civil rights This wording is subjective. Even with robust legislation that deals with indigenous rights, this conversation is muddy. There are many that feel traditional and civil rights are not violated, but other that feel they are. The subjectivity is problematic. The criteria should look if countries or supply base areas have legalities in place that address traditional and civil rights. Whether the legalities are sufficient is always subjective, but having legalities in place shows they are part of the process.</td>
</tr>
<tr>
<td>89</td>
<td>No information</td>
<td>The carbon stock is not determent for a positive CO2 balance but the mean annual growth</td>
</tr>
<tr>
<td>90</td>
<td>No information</td>
<td>2.1: Management of forest ensures features &amp; species of outstanding/exceptional value identified&amp; protected. I would like to include monitoring indicators, within criterion 2.1 to 2.4. Some indicators could be easy to fulfill. But, in order to increase transparency, it would be useful to measure the impacts of the operations. Examples of monitoring after forest operations: - Erosion from machinery - Waste - Protected areas - Remaining vegetation</td>
</tr>
<tr>
<td>91</td>
<td>No information</td>
<td>2.4: Management of forest ensures forest ecosystem health &amp; vitality maintained. How will long term monitoring be supported?</td>
</tr>
</tbody>
</table>

Q15: Do you want to comment on other criteria in the current SBP Standard 1: Feedstock Compliance Standard that you believe should be revised, or removed? Please select a criterion from the dropdown and enter the issue or proposed change description.

<table>
<thead>
<tr>
<th>Comment ID</th>
<th>Agreement</th>
<th>Comment</th>
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</thead>
<tbody>
<tr>
<td>108</td>
<td>No information</td>
<td>Criterion 2.2: Management of the forest ensures that ecosystem function is assessed and maintained through both the conservation/set-aside of key ecosystems or habitats in their natural state, and the maintenance of existing ecosystem functions throughout the forest (CPET S5 &amp; 8b). 2.2.8 The BP has implemented appropriate control systems and procedures for verifying that there is controlled and appropriate use of chemicals, and that</td>
</tr>
</tbody>
</table>
Integrated pest management (IPM) is implemented wherever possible in forest management activities (CPET S5c). It is nearly impossible for a BP to provide assurance to 2.2.8 if they do not own their own land. So far this has been assessed at a Regional scale which is appropriate. However, SBP should carefully consider how it is presented and evaluated.

<table>
<thead>
<tr>
<th>109</th>
<th>No information</th>
</tr>
</thead>
<tbody>
<tr>
<td>Criterion 2.2: Management of the forest ensures that ecosystem function is assessed and maintained through both the conservation/set-aside of key ecosystems or habitats in their natural state, and the maintenance of existing ecosystem functions throughout the forest (CPET S5 &amp; 8b). HCV and biodiversity often overlap. There needs to be a clear definition of the two. HCV: SBP should adopt the definitions of the HCV network or FSC and make it clear that an assessment needs to include all types of HCV. Biodiversity i a very general concept. SBP should clearly define what they mean with that and support that with references to possible sources for certificate holders, CBs, accreditation body, stakeholders and auditors.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>110</th>
<th>No information</th>
</tr>
</thead>
<tbody>
<tr>
<td>Criterion 1.3: There is compliance with the requirements of local, national and applicable international laws, and the laws applicable to Forest Management (CPET L2).</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>111</th>
<th>No information</th>
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</thead>
<tbody>
<tr>
<td>Criterion 2.1: Management of the forest ensures that features and species of outstanding or exceptional value are identified and protected (CPET S8c). subjective wording. &quot;Forest Management legislation covers the management and conservation of features and species of....&quot;</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>112</th>
<th>No information</th>
</tr>
</thead>
<tbody>
<tr>
<td>Criterion 2.7: The basic labour rights of forest workers are safeguarded (CPET S11). The standard should also cover labour rights in the pellet plant and supply chain.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>121</th>
<th>No information</th>
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<tbody>
<tr>
<td>The utility of the Supplier Verification Program is questionable as risks are very rarely defines as &quot;unspecified&quot;...rather they are directly defined as &quot;specified&quot; which makes the SVP program unnecessary according to the Standard. 2.5 Components of a Supply Base Evaluation. The SBE comprises both a Risk Assessment (RA) and a Supplier Verification Programme (SVP). This Standard, together with Standard 2, specifies the requirements for the evaluation. The BP will need to develop systems and procedures to ensure that all indicators are low risk. Such systems may be devised by the BP or may build on existing systems examples of which include SFI Fiber Sourcing and Legality Verification Systems. Although not specified in this Standard, it is likely that such systems will include: • A sampling plan for assessing forest operations within the Supply Base; • Records of those assessments; • Contractual requirements with suppliers; • Mechanisms to rank performance and development of a list of &quot;approved suppliers&quot;; • Monitoring and updating this information.</td>
<td></td>
</tr>
<tr>
<td>Comment ID</td>
<td>Agreement</td>
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<tr>
<td>122</td>
<td>No information</td>
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<tr>
<td>123</td>
<td>No information</td>
</tr>
<tr>
<td>124</td>
<td>No information</td>
</tr>
<tr>
<td>155</td>
<td>No information</td>
</tr>
<tr>
<td>158</td>
<td>No information</td>
</tr>
<tr>
<td>161</td>
<td>No information</td>
</tr>
<tr>
<td>189</td>
<td>No information</td>
</tr>
<tr>
<td>192</td>
<td>No information</td>
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</table>

Q16: Do you have any comments about any criteria in the current SBP Standards 2 to 6 that you believe should be revised, or removed?

<table>
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<tr>
<th>Comment ID</th>
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</thead>
<tbody>
<tr>
<td>206</td>
<td>No information</td>
<td>See comments regarding supply base explained in Standard 1 Q&amp;A.</td>
</tr>
<tr>
<td>207</td>
<td>No information</td>
<td>5.2.7 Mixing of biomass Normative Interpretations. With the acceptance of mass balancing for other SBP approved schemes like FSC and PEFC, it is unclear what assurance the no-mixing rule is intended to provide. There is no additional sustainability characteristics with biomass by implementing a no mixing rule. The rule is optically an attempt to increase revenue by requiring pellets to obtain a SBP compliant or controlled claim prior to entering a storage facility with other pellets. If the certificate holder can demonstrate the implementation of a mass balancing system that ensures there is not more SBP claims than SBP pellets mixed then there should be no reason why SBP pellets cannot be mixed with non-SBP pellets. SBP should develop criteria around what a mass balancing system should look like, perhaps using criteria already developed by PEFC or FSC.</td>
</tr>
<tr>
<td>208</td>
<td>No information</td>
<td>Standard 2. criterion14. The criterion is often misunderstood. The criterion refers to unspecified risks</td>
</tr>
</tbody>
</table>
and instruction note 2A refers to monitoring systems of the BP. Make Instruction note 2A a separate criterion. the requirements for monitoring are extremely important for the credibility of SBP.

209  No information  Use of non-forest feedstock. develop specific criteria for non-forest feedstock

210  No information  Standard 3, Criterion 8.1 . Delete. Work should be focused on acceptance of SFI. "Note:" should be removed.

229  No information  Expand the chain of custody standard to clarify SBP’s mass balance rules. SBP’s mass balance rules are now significantly different to FSC and PEFC.

Q17: Should the following environmental issues be considered in the Standard Development Process? Some of these issues are not currently included in Standard 1, for those that are the requirements could be expanded.

**Biodiversity**

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<tr>
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<tbody>
<tr>
<td>320</td>
<td>Neutral</td>
<td>I believe that biodiversity should continue to be addressed. I think that the current level of coverage is adequate. There are many forces at play (not related to a BP’s sourcing), and biodiversity is a very complex concept that can be measured at multiple scales. SBP should be cautious in its approach and not try to force the Standard to verify more than is appropriate for the industry.</td>
</tr>
<tr>
<td>321</td>
<td>Yes - agree</td>
<td></td>
</tr>
<tr>
<td>322</td>
<td>No - disagree</td>
<td></td>
</tr>
<tr>
<td>323</td>
<td>Yes - strongly agree</td>
<td></td>
</tr>
<tr>
<td>324</td>
<td>Yes - agree</td>
<td></td>
</tr>
<tr>
<td>325</td>
<td>Yes - agree</td>
<td></td>
</tr>
<tr>
<td>326</td>
<td>Neutral</td>
<td>Biodiversity is already covered</td>
</tr>
<tr>
<td>327</td>
<td>Neutral</td>
<td></td>
</tr>
<tr>
<td>328</td>
<td>No - disagree</td>
<td></td>
</tr>
<tr>
<td>329</td>
<td>Neutral</td>
<td></td>
</tr>
<tr>
<td>330</td>
<td>Neutral</td>
<td></td>
</tr>
<tr>
<td>331</td>
<td>Yes - agree</td>
<td>Too material in the standard, and result is redundancy.</td>
</tr>
<tr>
<td>332</td>
<td>Yes - strongly agree</td>
<td></td>
</tr>
<tr>
<td>333</td>
<td>Yes - agree</td>
<td></td>
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</tbody>
</table>

**Carbon Storage**

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<tr>
<th>Comment ID</th>
<th>Agreement</th>
<th>Comment</th>
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<tbody>
<tr>
<td>334</td>
<td>Yes - agree</td>
<td>This may be achieved by reporting publicly available information on forest industry in the US. This may help SBP to respond to NGOs.</td>
</tr>
<tr>
<td>335</td>
<td>Yes - agree</td>
<td></td>
</tr>
<tr>
<td>336</td>
<td>No - disagree</td>
<td></td>
</tr>
</tbody>
</table>
Carbon storage is key to reduce the CO2 in the atmosphere. Short-term carbon storage is MAI. Long term storage is not necessarily increase in standing wood volume also long time storage of harvested trees contribute.

The goal of the standard is carbon. There should not be individual carbon accounting.

Need method that is acceptable to all and takes into consideration age and species.

I feel that this is already addressed in the Standard. It might be strengthened if BPs were asked to provide regionally relevant evidence and SBP then used this in communication to concerned NGOs.

Conversion is an issue. Degradation is more difficult to identify.

Greenhouse gas emissions

<table>
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<td></td>
</tr>
<tr>
<td>367</td>
<td>No - strongly disagree</td>
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</table>
368 Yes - agree I think it's going to be very difficult for SBP to avoid the issue of GHG emissions. It's implied in the nature of the standards, especially in standard 5, but it is not followed-through on. I'm not sure how to do it well, but I believe it needs to be included in some measure.

369 No - disagree
370 Yes - agree
371 Neutral
372 Yes - strongly agree SBP should consider implementing a GHG calculator so they can pass on calculated emissions figures.
373 No - disagree

**Renewable energy**

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**Resilience to climate change**

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<tr>
<td>388</td>
<td>No - disagree</td>
<td>This topic needs much research before it can be condensed into a SBP criteria. Treating it at the same level as SFI currently is appropriate.</td>
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<td>394</td>
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<tr>
<td>395</td>
<td>Yes - agree</td>
<td>Climate change is such an important issues and resiliency is going to be very important in the future as the climate continues to shift.</td>
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<tr>
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Soils

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<tr>
<td>402</td>
<td>No - disagree</td>
<td>SBP already addresses soils at some level. This is a very difficult criteria for a BP that does not own land to address. In the US the current approach is protection of site via implementation of BMPs.</td>
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<td>406</td>
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<td>Soils are already covered.</td>
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<tr>
<td>410</td>
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<td>It would be more detailed for the different quality indicators: nutrients, structure, erosion.</td>
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<td>No - disagree</td>
<td>Soils are adequately covered in 2.2.2.</td>
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Watershed management

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<td>414</td>
<td>No - disagree</td>
<td>SBP coverage and requirements to protect ecosystem services already covers this. Again, the Standard should not be forced to prove and demonstrate more than it is capable of.</td>
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<td>While also a very important issue, I feel that this is touched on a bit more already in the standard.</td>
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Q18: Should the following social issues be considered in the Standard Development Process? Some of these issues are not currently included in Standard 1; whilst some are already included, but could requirements could be expanded.

**Child labour**

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<td>432</td>
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<td>Yes - agree</td>
<td>Very hard topic to deal with in the SBP framework.</td>
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**Forced labour**

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**Gender equality**

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<td>No - disagree</td>
<td>Very hard topic to deal with in the SBP framework.</td>
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<tr>
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</table>
461  Yes - agree
462  Neutral
463  Neutral  I believe it is a bit out of the scope of the standards. I also think that it's covered a bit in standard 4 through implementing FSC 40-004 or PEFC COC standard.
464  No - strongly disagree
465  Neutral
466  Neutral
467  No - disagree
468  Yes - agree
469  Yes - agree

Poverty alleviation

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<td>476</td>
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<tr>
<td>477</td>
<td>No - disagree</td>
<td>I don't think a pellet plant can ultimately do much for poverty alleviation and it would be a meaningless indicator that would cause a lot of frustration.</td>
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<tr>
<td>478</td>
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Q19: Should the following certification schemes remain SBP-approved Forest Management Schemes?

FSC International

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**PEFC**

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**SFI**

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<tr>
<td>515</td>
<td>Yes - agree</td>
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<tr>
<td>516</td>
<td>Yes - strongly agree</td>
<td>SFI has already made a significant positive impact on the management of forest resources in the US (and Canada). The commitment to logger training, implementation of BMPs to protect water quality, and contribution to research is making a real difference on the landscape.</td>
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<tr>
<td>527</td>
<td>Yes - strongly agree</td>
<td>These are all good certification schemes. The outcomes of all of them is better managed, sustainable forests.</td>
</tr>
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Q20: Should the following certification schemes be recognised by SBP in some way?

### EN Plus

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### GoodChips

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<td>561</td>
<td>No - disagree</td>
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<td>563</td>
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RSB

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<td>No - strongly disagree</td>
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Q21: Please let us know if you would like to make any further comments.
No response

Q22: Please tell us your organisation type.

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<td>Certificate Holder - End-user</td>
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### 3 Other responses

#### 3.1 Related to Standard 1

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<tr>
<td>622</td>
<td>Section indicator 2.1.2, 2.2.3, and 2.2.4 The concepts of HCV, key ecosystem and habitats, and biodiversity can overlap significantly, but are also different concepts. These concepts are difficult to correctly interpret. While with 2.1.1 there exists one indicator specifically requiring the identification and mapping of HCV, there is no indicator requiring the same for biodiversity values and key ecosystem and habitat, suggesting these are largely similar issues, which they certainly can be. The Latvian SBP-endorsed regional risk assessment relies on the same evidence for indicators 2.1.2 and 2.2.3, thus implying high similarity (though coming to a different risk conclusion). In addition, SBP does not have a working definition for HCV, key ecosystem and habitats and biodiversity. For HCV SBP relies on the widely adopted definition by the HCV network, which is good. For the other two types, there are no definitions given, but only some examples in ST 1. Suggestion It might be beneficial to have the greenhouse gas (GHG) emissions in CO2e / MJ or MWH for the feedstock (e.g. pellet, or chip), up to the end point of the BP. This will be helpful as we are doing some work for a firm and we need to calculate the likely final GHG emissions when converted by a CHP plant using their name plate efficiency (the piece of kits specification). This would save calculating the emissions and also allow buyers to quickly note the emissions up to the end point of that BP (emissions for cultivation and harvesting [if Roundwood], transport, storage, processing, shipping etc).</td>
</tr>
<tr>
<td>635</td>
<td>Section SAR Suggestion Reword: Where enforcement of laws, regulations or protections does not exist the Biomass Producer has implemented appropriate control systems and procedures for verifying that Freedom of Association and the effective recognition of the right to collective bargaining are respected. Add to examples of means of verification: World Bank Governance Indicators.</td>
</tr>
<tr>
<td>636</td>
<td>Section Feedstock origin. Suggestion Reword: Where enforcement of laws, regulations or protections does not exist the Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is not supplied using any form of compulsory labour. Add to examples of means of verification: World Bank Governance Indicators.</td>
</tr>
<tr>
<td>637</td>
<td>Section Indicator 2.2.1 The BP has implemented appropriate control systems and procedures to verify that feedstock is sourced from forests where there is appropriate assessment of impacts, and planning, implementation and monitoring to minimise them. Suggestion Reword: Where enforcement of laws, regulations or protections does not exist the BP has implemented appropriate control systems and procedures to verify that feedstock is not supplied using child labour. Add to examples of means of verification: World Bank Governance Indicators.</td>
</tr>
<tr>
<td>638</td>
<td>Section Indicator 2.2.3 The BP has implemented appropriate control systems and procedures to ensure that key ecosystems and habitats are conserved or set aside in</td>
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<tr>
<td>Section</td>
<td>Indicator</td>
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<tr>
<td>639</td>
<td>2.2.4</td>
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<td>2.2.7</td>
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<td>645</td>
<td>2.5.1</td>
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<tr>
<td>Section Indicator 2.5.2</td>
<td>The Biomass Producer has implemented appropriate control systems and procedures for verifying that production of feedstock does not endanger food, water supply or subsistence means of communities, where the use of this specific feedstock or water is essential for the fulfilment of basic needs. Suggestion Reword: A Group Member is a forest owner or forest manager who participates in a group scheme for the purpose of SBP Group Scheme certification. Group Members are responsible for following the management plan prescribed by the Group Manager. Group Members do not hold individual certificates, but as long as they comply with all the requirements of group membership, their forest properties are covered by the scope of the certificate issued to the Group Manager.</td>
</tr>
<tr>
<td>Section Indicator 2.6.1</td>
<td>The Biomass Producer has implemented appropriate control systems and procedures for verifying that appropriate mechanisms are in place for resolving grievances and disputes, including those relating to tenure and use rights, to forest management practices and to work conditions. Suggestion Reword: 1.1 The Group Manager shall: a) have received written permission from SBP to be a Group Manager and b) be an independent legal entity or an individual acting as a legal entity, or b) be an SBP certified Biomass Producer holding a valid SBP certificate which includes Standard 2 in its scope.</td>
</tr>
<tr>
<td>Section Indicator 2.7.1</td>
<td>The Biomass Producer has implemented appropriate control systems and procedures for verifying that Freedom of Association and the effective recognition of the right to collective bargaining are respected. Suggestion Reword: 1.11 The Group Manager shall maintain records of: a) a contract or agreement with clear member expectations and remediation with each Group Member b) a commitment from each Group Member in which they declare that they will maintain the management plan written by the Group Manager containing the SDE+ Sustainability requirements and the SDE+ Chain of Custody requirements insofar as applicable to each Group Member.</td>
</tr>
<tr>
<td>Section Indicator 2.7.2</td>
<td>The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is not supplied using any form of compulsory labour. Suggestion Add under principle and before indicator 3.1: (from ADBE Dec 2018 report section 3 Summary of findings on scheme SBP, item 3.1): SBP group certification is performed at the level of the biomass producer. The commission (ADBE) has noted that the group manager will audit the forest owners or managers (internal evaluation of the group). In addition, SBP requires that an independent conformity assessment body audits the group, which includes performing sample-wise conformity assessments of the group members at Forest Management Unit (FMU) level. The commission therefore concludes that SBP meets the requirement that conformity assessments start at the FMU.</td>
</tr>
<tr>
<td>Section Indicator 2.7.3</td>
<td>The BP has implemented appropriate control systems and procedures to verify that feedstock is not supplied using child labour. Suggestion Add clarification that principles 3, 4 &amp; 5 can be met at the landscape level</td>
</tr>
<tr>
<td>Section Indicator 2.7.4</td>
<td>The BP has implemented appropriate control systems and procedures for verifying that feedstock is not supplied using labour which is discriminated against in respect of employment and occupation. Suggestion Add: Records must be retained for five years.</td>
</tr>
<tr>
<td>Section Indicator 2.7.5</td>
<td>The BP has implemented appropriate control systems and procedures for verifying that feedstock is supplied using labour where the pay and employment conditions are fair and meet, or exceed, minimum requirements. Suggestion Reword: As part of the stakeholder consultation process the BP shall make the results of the RBA and the mitigation measures implemented publicly available upon request.</td>
</tr>
</tbody>
</table>
### Section Indicator 2.8.1

The BP has implemented appropriate control systems and procedures for verifying that appropriate safeguards are put in place to protect the health and safety of forest workers (CPET S12). Suggestion: The RRA should be reviewed every 5 years as with other schemes. Yearly review is not a value adding exercise. Most publicly available information does not get verified that often. Assuming an extension of the RRA process for Cat 2 consider rewording: The BP shall conduct a review of the risk assessment and the mitigation measures at least every 5 years. More frequently if there are relevant developments in the homogeneous region(s) from which feedstock is sourced, or relevant changes in the information gathered for a homogeneous region or indicator.

### Section IN 2 C3.1

The SBR is available on the SBP website, along with pertinent information and the PSR. The SBP website provides a concise overview on all certificate holders. Publishing the SBR on the BP’s website is thus redundant and does not add much transparency to the SBP process. By including the website on the certificate holder overview on the SBP website, stakeholders can find more information on the company. Suggestion: Remove "weighted" in "...weighted maximal...".

### Section IN 2C 3.1

Most SBRs are in reality submitted by the CB to SBP after an audit report is finalized. This requirement however applies to certificate holders. It creates...
situations where the CB is partially responsible for the BP a ability to keep this requirement. Suggestion SBP should develop clearer rules on mass balance based on available UK, Dutch and EU guidance (potentially within a separate mass balance standard) and should ensure that all sustainability information is transferred under a single, consistent mass balance (e.g. proportionate or non-proportionate). Careful attention is required to consider how common practices, such as use of non-proportionate credit accounts for certification claims and SAR data for feedstock information (proportionate), risk misallocation of sustainability information.

Batch codes (linked to the SAR) currently provide the information required for reporting feedstock consignments and passing on GHG information and so provides the logical focus of the mass balance rules.

Where ID5D is used, credit accounts for all biomass should be required to avoid the BP operating under two separate mass balance systems for feedstock type (i.e. non-proportionate, credit account for ID5D material; proportionate system using SAR for non ID5D material). However, aggregation should be allowed (e.g. Category 1 & Category 2) to reduce number of different accounts to a manageable number.

Consideration is also required to how feedstock category credit accounts should be integrated with certification claim accounts to ensure sustainability information remains attached.

Section INT Supply Base Report, Section 7; INT ST 2 section 9 SBP states in the interpretation to SBR section 7 that "Any action taken by the BP whether as a result of the identification of the risk or as part of the ongoing management system of the BP shall be reported under Section 9, Mitigation Measures in the SBR template." The concept of having to conclude low risk only based on regional, publicly available data, information and publications before the BP takes any action through their management system is hard to implement and SBP is not consistent about this as will be laid out here:

1. For some ST 1 indicator a low risk seems only possible through implementation of a management system because there is no applicable public data or it just doesn't apply, such as in the case of the definition of the supply base or the description of the feedstock input profile (1.1.1, 1.1.3).
2. Most of the standard 1 indicators require the BP to implement appropriate control systems and procedures to verify/ensure (...) that indicators are met. These procedures and control systems are understood to mean a management system.
3. Means of verification are used to determine the initial risk in the supply base or specific sub-scopes. In Standard 1, many MoV however refer to the management system of a BP. Examples include: supply contracts, monitoring results, records of BP's field inspections, Standard Operating Procedures, Guidance provided by BPs to suppliers/forest operators, Procedures, etc. These can be seen as being part of the management system. How can the management system not be applicable in the initial risk determination, but at the same time qualified as means of verification to determine initial risk?
4. Furthermore, the following interpretation is in effect as well (INT ST 2, section 9, clarification): “In evaluating risk against the indicators in Standard 1 the BP is required to evaluate the risks that result from a combination of factors that are related to the woody biomass found in the Supply Base and the management system of the BP.” […] “Risk may also be altered by action taken by the BP such as sourcing policies, mapping of high risk areas or undertaking supplier audits. It may not always be clear if these interventions are part of the BP management system, Supplier Verification Program or mitigation measures.” This last paragraph is in contradiction to the interpretation to SBR section 7 as cited above.
5. The interpretation to SBR section 7 (December 2018) may be more recent than the
one to ST 2 section 9 (>March 2016), but both are valid but to a significant extent incompatible in our view.

6. Thus, the concept of qualifying the management system as mitigation measure is confusing and hard to communicate. There are indicators for which this makes more sense, e.g. indicator whose risk determination relies heavily on available third-party data, information or publications (such as 2.1.1) Are BPs that implement SBEs in the absence of an RRA supposed to specify risk for almost all indicators? Suggestion Remove the clause.

623 Section 12.4 The clause states that the BP must record information in the "public summary report", when SBP actually means the supply base report in our view. The use of this ambiguous term creates confusion, since the CB's report is called "Public Summary Report". Suggestion Delete reference to 'tree stump' and use district, commune or whatever the term is depending on the language.

654 Section Criteria 6.2 The BP shall record the place of harvesting and the identity of the primary wood processor responsible for the supply of inputs classified as SBP-compliant secondary feedstock. Suggestion Add: (from ADBE Dec 2019 report section 3 Summary of findings on scheme SBP, item 3.1):SBP certification starts at the biomass producer, which for the RBA is in line with the condition on the first link in the Chain-of-Custody (CoC) from Dutch sustainability criterion 12.6. For group certification the commission has earlier concluded that SBP meets the requirement from Table 2 in Annex D of the Dutch regulation that conformity assessments start at the FMU. More details on this conclusion can be found in the ADBE's public assessment report on SBP from December 2018.

655 Section Criteria 7.1 The BP shall prepare a Supply Base Report (SBR) which shall be made readily accessible on the BP’s website. Commercially sensitive and confidential information may be excluded from the SBR. Suggestion These should be incorporated into the standard in an official capacity through the creation of new clauses, elimination of certain clauses, and editing existing clauses.

656 Section Criteria 11.2 The evaluation of risk begins with an evaluation of regional rather than at an individual forest level or land unit. Credible information of low-risk is required and this should include regulatory requirements and evidence of compliance with regulatory requirements. The Transparency International corruption perception index http://www.transparency.org/ will be one important information source. Suggestion These should be incorporated into the standard in an official capacity through the creation of new clauses, elimination of certain clauses, and editing existing clauses.

657 Section 15 Management Systems This could be the proper place to add in a multi-site management system and auditing process. If a BP has multiple site under one management scheme than they would be able to use a multi-site auditing process. Each mill would still be required to hold its own certification but the auditing process would be as with FSC's multisite allowing the CB to rotate through mill sets of companies with multiple manufacturing operations. Off year mill reports would still be reviewed for accuracy each year as currently completed. Suggestion This is a complicated issue and coming to the appropriate solution will likely a work group effort, but one initial option to consider would be to create a new 'Feedstock Producer’ certificate holder category which would be exempt from the DTS input requirements, but which would also have additional CoC requirements for claim statements to be included on sale & invoice documents (following dds of their choosing.) Instead of requiring Feedstock Producers to pass along batch-level data, they would work with their Biomass Producer customers to scope the origin of their feedstock sales into the BP's annual supply base report (and also include reference to or attach their own approved feedstock producer SBR as an addendum to the BP’s SBR.)

658 Section IN 2C criteria 5.4 Updates should be provided in the form of a revised report or additional pages, either published separately or added to the original SBR.
<table>
<thead>
<tr>
<th>Page</th>
<th>Suggestion</th>
<th>How does SBP ensure that a biomass producer (BP) is not a bad actor in a low risk area?</th>
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<tbody>
<tr>
<td>679</td>
<td>These should be incorporated into the standard in an official capacity through the creation of new clauses, elimination of certain clauses, and editing existing clauses.</td>
<td>For recertification audits then require BPs to monitor sites that have been harvested in the last 5 years.</td>
</tr>
<tr>
<td>680</td>
<td>Depth of audit of underlying COC system Which COC critical control points overlap with SBP CCP and therefore already covered? OHSA tied to COC system, Material accounting, Physical separation, Interviews – awareness of relevant staff, Training – records? Training plan?, Procurement – covered in ST 1, 2 and 4, Transactions – thoroughly covered through DTS, Trademarks – ST 4.</td>
<td>How does SBP ensure that a biomass producer (BP) is not a bad actor in a low risk area?</td>
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<td>698</td>
<td>Multisite credit sharing. BPAs that are on a credit account that is shared between sites. E.g. can shared credits be used to produce SBP compliant feedstock (received with SBP compliant COC claim).</td>
<td>How does SBP ensure that a biomass producer (BP) is not a bad actor in a low risk area?</td>
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<td>702</td>
<td>What are the potential impacts (pros and cons) of implementing multi-site certificates? Is this something the WG will address or is this more suited as a Technical Committee assignment?</td>
<td>How does SBP ensure that a biomass producer (BP) is not a bad actor in a low risk area?</td>
</tr>
<tr>
<td>704</td>
<td>Consider eliminating the requirement for a BP to conduct a stakeholder consultation, and instead make this the responsibility of the CB. This would more closely align with FSC practices and would be less of an irritant to potential stakeholders who become frustrated by multiple requests related to the same audit.</td>
<td>How does SBP ensure that a biomass producer (BP) is not a bad actor in a low risk area?</td>
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<td>706</td>
<td>Make it mandatory for a certificate holder to notify their CB in writing in the event of a change in the status of any underlying certificates such as CoC, Forest Management, etc.</td>
<td>How does SBP ensure that a biomass producer (BP) is not a bad actor in a low risk area?</td>
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<tr>
<td>710</td>
<td>A Supply Base Evaluation should be mandatory for all Biomass Producers.</td>
<td>How does SBP ensure that a biomass producer (BP) is not a bad actor in a low risk area?</td>
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<tr>
<td>711</td>
<td>Clarify the requirements for conducting Biomass Producer document reviews. Is it necessary to utilise a third party or can the Biomass Producer utilise internal resources for this, and if so, what are the minimum qualifications?</td>
<td>How does SBP ensure that a biomass producer (BP) is not a bad actor in a low risk area?</td>
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<tr>
<td>713</td>
<td>Risk based system advantages: System focusing on main gaps identified as specified risk; Less time and resources needed with similar outcome; Can reach larger areas compared to FMU certification.</td>
<td>How does SBP ensure that a biomass producer (BP) is not a bad actor in a low risk area?</td>
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<tr>
<td>714</td>
<td>Risk based system challenges: Might be weak when risk assessment is produced by Biomass Producer due to Conflict of Interest, qualification and competence personnel, stakeholder involvement, quality of information, applicability in developing countries; Regional Risk Assessment – last endorsed in JUN17; Comprehensive system involving large number of experts and stakeholders.</td>
<td>How does SBP ensure that a biomass producer (BP) is not a bad actor in a low risk area?</td>
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<tr>
<td>715</td>
<td>Issues in risk assessments: Low risk is justified by Biomass Producer activity; Reference to Biomass Producer without any additional information (soil, chemicals, biodiversity, etc.); Reference to existing certification practices (FSC/SFI/PEFC) when evaluating non-certified areas; Extensive unrelated text in the risk justification; Lack of reference to relevant research/studies; Weak description of the existing legislation and level of enforcement; Lack of statistical data which would reflect the level of risk in general; The risk conclusion from SBR is not in line with Annex 1; Mitigation measures are not transparent – not sufficient detail for stakeholders.</td>
<td>How does SBP ensure that a biomass producer (BP) is not a bad actor in a low risk area?</td>
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3.3 Related to Standard 3

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<tr>
<td>620</td>
<td>Section IN 3E 3.1 &amp; PSR section The following sections are identical in SBR section 2.1 and PSR section 5.2: Land use status; Ownership status; Socio-economic conditions; Forest composition; Profile of adjacent lands; Description of the forestry management practices or land management practices used; Description of the presence of any CITES or IUCN species; Provide a general description of the supply base within the regional context including country of harvest; Description of the process and results from the final harvest sampling programme; Metrics for the Supply Base / summary statistics. Suggestion Relocate to, or add additional clauses, under standard 4/new mass balance standard.</td>
</tr>
<tr>
<td>627</td>
<td>Section Interpretation 6.4 Some things need to be clarified here: If the audit is conducted before production starts but after the mill is constructed, can production still be included in the scope of the certificate? The interpretation states “the scope of the certificate could not include production until that aspect of the process can be evaluated.” which contradicts with clause 6.2.3 of ID-5E which states “for recently commissioned plants, engineering values may be used as verifiable evidence”. So when does SBP consider that the “process can be evaluated”? We consider the process can be evaluated before production has started. It might even be the case that production for most pellets mills or wood chippers is not a significant source of risk. Suggestion Reword: If the BP has long term land management responsibilities the BP implements appropriate control systems and procedures ensure sourcing practices do not negatively impact air quality due to forest management activities. Add to examples of means of verification: Forest practice laws and guidelines; Standard Operating Procedures; Codes of Practice; Records of BPs’ field inspections.</td>
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<tr>
<td>675</td>
<td>SBP Standard 3: Certification Systems. Requirements for Certification Bodies, defines how the Certification Body should check that the evaluation undertaken by the Biomass Producer meets the SBP Framework requirements. Should read like:</td>
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</table>
SBP Standard 3: Certification Systems. Requirements for Certification Bodies, defines how the Certification Body should operate, including requirements for the CB governance and management systems, as well as for how they should evaluate applicants and certificate holders against the remaining SBP Framework requirements.

676 Regarding intended outcomes and Monitoring & Evaluation of Standard 3, as we discussed on the 12th Feb, the main one relates to “Providing assurance of legal and sustainable practice”: Secondarily also these two would be relevant: “Realising best practice” and “Achieving recognition by regulatory authorities.”

678 ASI could do a pilot version of the revised standard 3 by evaluating a draft version at a Head Office assessment and producing a report.

684 Keep FSC/ PEFC accreditation as way of ensuring general competence of accredited certification body for SBP certification services.

685 Limit standard 3 to SBP specific topics.

701 Incorporate all existing interpretations and clarifications.
Sampling ports.
Regular audit schedule – risk based and sampling approach.
Adding ports in-between audits.

705 Consider dropping the requirement for a BP to post audit documents on the BP’s website since they are also posted on the SBP website. This would more closely align with FSC practices.

707 Require that Certification Bodies share stakeholder comments with Biomass Producers which originate from Certification Body stakeholder consultations. The identity of the commenter could remain anonymous.

709 Provide a mechanism for the reporting of Certification Body performance in the form of an annual summary. Biomass Producers engage and pay Certification Bodies but often are unaware of Certification Bodies deficiencies until it is too late to take action.

3.4 Related to Standard 4

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| 628        | Section 5.2.7 Remove EUTR-compliant biomass, concept no longer supported by SBP.  
Suggestion Reword:  
If the BP has long term land management responsibilities the BP implements appropriate control systems and procedures to ensure sourcing practices consider the controlled and appropriate use of chemicals, and that Integrated pest management (IPM) is implemented wherever possible in forest management activities (CPET S5c). |
| 629        | Section 6.3.1 Update FSC and PEFC standard versions. Suggestion Reword:  
The BP has implemented appropriate control systems and procedures ensure sourcing practices does not negatively impact the health, vitality and other services provided by forest ecosystems (CPET S7a).  
Add to examples of means of verification:  
Regional, publicly available data from a credible third party;  
The existence of a strong legal;  
framework in the region. |
| 630        | Section IN 4A It is not clear if the entire IN 4A is only applicable to post-consumer feedstock. Suggestion Reword: |
If the BP has long term land management responsibilities the BP implements appropriate control systems and procedures to ensure natural processes, such as fires, pests and diseases are managed appropriately (CPET S7b).

### Section All SBP has no clear guidance for mass balance, aside from deferring to FSC or PEFC COC control systems. This has resulted in a complicated set of mass balance systems within SBP that do not necessarily adhere to UK, Dutch or wider EU guidance on mass balance and which risk undermining the robustness of sustainability information transferred throughout the supply chain. These systems include:

- **FSC/PEFC COC control systems** - managed in an independent ledger and applied to FSC, PEFC and SBP claims (typically a non-proportionate credit system, though can be proportionate where percentage system used);
- **FSC/PEFC COC control systems** - managed in an independent ledger and applied to feedstock category data under ID5D (typically non-proportionate credit system);
- **Batch codes** - managed through the DTS and used to pass on information regarding pellet plant of origin, reporting year, distribution route and dynamic data throughout the supply chain (proportionate or non-proportionate system - no clear rules);
- **The SAR** - applied by the end user to establish feedstock consignments and determine the mass contribution and GHG emissions of said consignments (proportionate system, unless received with dynamic data).

These systems are managed and audited independently, increasing the risk that sustainability information does not remain attached to biomass. For instance:

- A port mixes biomass from 2 plants - one that carries FSC mix credit claims and one that does not - the port operator uses a percentage based system for allocating batch codes and credit account for FSC claims. The port risks sending on a shipment carrying material from both plants with 100% of the biomass carrying the FSC mix credit claim;
- A BP accumulates credits relating to category 5 biomass over an 8 month period before a SAR is conducted (SBP-XX-YY-01). All credits are sold in the next 4 months (SBP-XX-YY-01-99) to an end user in the Dutch market while further shipments are made of SBP-XX-YY-01 to other end users. End users receiving the code SBP-XX-YY-01 will rely on SAR data for feedstock information and report that it has received category 5 material from the BP, when in fact this material has all been sold elsewhere.

Equally, the mass balance systems within FSC/PEFC are appropriate for mass balancing SBP claims but not necessarily for allocating sustainability characteristics. This is because they are only concerned with one half of the mass balance (i.e. the material that carries a claim). Operators are therefore allowed to overstate the amount of unsustainable material within these mass balance systems. However, when applied to specific biomass characteristics e.g. feedstock type, it is important that a full mass balance is operated to ensure sustainability information remains attached. For instance, if a biomass producer keeps a credit account for category 5 material but does not pass on these claims then this information will not remain attached to the biomass. Suggestion Reword:

Where enforcement of law, regulations and protections does not exist the Biomass Producer has implemented appropriate control systems and procedures for verifying that legal, customary and traditional tenure and use rights of indigenous people and local communities related to the forest are identified, documented and respected (CPET S9).

Add to examples of means of verification:

World Bank Governance Indicators.
Section 3 Chain of custody requirements. The section is not clear enough to confirm during audit that the BP is solely responsible for CoC requirements. Suggestion These should be incorporated into the standard in an official capacity through the creation of new clauses, elimination of certain clauses, and editing existing clauses.

A number of normative interpretations for Std. 4 have been released over the years that contradict and/or add to the current requirements in this standard. These should be incorporated into the standard in an official capacity through the creation of new clauses, elimination of certain clauses, and editing existing clauses.

Section 5.2.1, 5.2.2, and 5.2.3 on which feedstocks can be considered SBP-compliant or Controlled (Terminology/wording in other clauses throughout the set of SBP standards and IDs, such as those clauses in section 5.5 of Std. 4, would likely also be affected by this suggestion.) I recall that the following draft interpretation to cover situations in which upstream feedstock suppliers become certified to produce SBP Compliant or Controlled feedstock was being considered late in 2019: "Feedstock received with an ‘SBP-compliant biomass’ claim may be considered to be SBP-compliant feedstock. Feedstock received with an ‘SBP-controlled biomass’ claim may be considered to be SBP-controlled feedstock." We agree with this concept but worry that this suggested interpretation would be difficult to implement in this manner, mostly because it would be difficult (and maybe altogether unworkable) for a BP to manage feedstock inputs (for either all or just a portion of their total feedstock) through the DTS. To my knowledge the DTS is not currently set up to function as a credit ledger or to apply yield factors as roundwood, for example, is processed into wood pellet biomass outputs. This is a complicated issue and coming to the appropriate solution will likely a work group effort, but one initial option to consider would be to create a new ‘Feedstock Producer’ certificate holder category which would be exempt from the DTS input requirements, but which would also have additional CoC requirements for claim statements to be included on sale & invoice documents (following dds of their choosing.) Instead of requiring Feedstock Producers to pass along batch-level data, they would work with their Biomass Producer customers to scope the origin of their feedstock sales into the BP’s annual supply base report (and also include reference to or attach their own approved feedstock producer SBR as an addendum to the BP’s SBR).

Instead of using FSC/PEFC underlying accreditation and link to system used to audit client – replace by just referring to 17021.


SBP products in COC scope Does pellet have to be in the scope of FSC certificate of the SBP applicant who wants to sell SBP compliant pellets? Make it explicit, since there are different interpretations on this within CBs, ASI, SBP

3.5 Related to Standard 5

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<tr>
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<tr>
<td>624</td>
<td>Section ID 5E, 3.2 The SAR now uses the term “Static Data Indicators” and the ST 5 and related IDs use the old term “Static Data Identifiers”. The order of the SAR does</td>
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</table>
not match the order of ST 5 and related IDs. Suggestion Add to examples of means of verification:
Standard Operating Procedures;
Codes of Practice;
Records of BPs’ field inspections.

| 625 | Section Anything requiring DTS It is our understanding the DTS transaction data cannot be complete unless the minimum data entries are met. Why are there so many indicators on DTS? Suggestion Reword: The BP has implemented appropriate control systems and procedures ensure that sourcing practices do not negatively impact key ecosystems and habitats (CPET S8b). |
| 626 | Section ID 5E, 6.5.4 There is no place to clearly report this in the SAR, especially for thermal and phytosanitary treatments. Suggestion Reword: The BP has implemented appropriate control systems and procedures ensure that sourcing practices to protect biodiversity (CPET S5b). |
| 631 | Section ID 5E, 6.4.6 "Weighted maximal transport distances" This makes no sense. What is a weighted maximum?? Suggestion Reword: Where enforcement of laws and regulations does not exist the Biomass Producer has implemented appropriate control systems and procedures for verifying that there are adequate protections of the forest from unauthorised activities, such as illegal logging, mining and encroachment (CPETS7c). Add to examples of means of verification: World Bank Governance Indicators. |
| 703 | Invoicing for shipments and digital traceability solution (DTS) After the material has been sold and an invoice sent to the customer, is there a deadline after which the transaction needs to be logged in the DTS? |

### 3.6 Related to other topics

#### Standards 2 and 3

<table>
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<tbody>
<tr>
<td>686</td>
<td>Define certification scopes requirements (referring to supply base evaluation countries and feedstock types) and link them to accreditation scope.</td>
</tr>
<tr>
<td>695</td>
<td>Should this not be more than 2.0%? Not sure why above 2% maybe permitted as SBP is an approved scheme for the RO or RHI in the UK. UK RO Guidance from Ofgem: 6.13 Many biomass pellets contain biomass binders which will not necessarily have the same characteristics as the rest of the pellet. In this case, where the binder is &lt;2% by weight, it will be considered to have the same sustainability characteristics as the pellet. In all other cases the sustainability characteristics of the binder, in its entirety, will have to be reported separately to the rest of the pellet.</td>
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#### Instruction Document 2D

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<tr>
<td>659</td>
<td>Section Scope: A Group Member is a forest owner or forest manager who participates in a group scheme for the purpose of SBP Group Scheme certification. Group Members are responsible for implementing any and all requirements of group membership that are applicable to the Group Member. Group Members do not hold</td>
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</table>
individual certificates, but as long as they comply with all the requirements of group membership, their forest properties are covered by the scope of the certificate issued to the Group Manager.

Section 1: General Requirements

1.1 The Group Manager shall:

a) be an independent legal entity or an individual acting as a legal entity.
b) be an SBP certified Biomass Producer holding a valid SBP certificate which includes Standard 2 in its scope.
c) have received written permission from SBP to be a Group Manager.

Section: Indicator 1.11 The Group Manager shall maintain records of:

a) a legally enforceable contract with each Group Member
b) a declaration submitted by each Group Member in which they declare that they meet the SDE+ Sustainability requirements and the SDE+ Chain of Custody requirements insofar as applicable to each Group Member.

Section 3: Chain of custody requirements. The section is not clear enough to confirm during audit that the BP is solely responsible for CoC requirements. Suggestion Add clarification that principles 3, 4 & 5 can be met at the landscape level.

Instruction Documents 2D and 2E

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<tr>
<td>663</td>
<td>Section 3 Chain of custody requirements. The section is not clear enough to confirm during audit that the BP is solely responsible for CoC requirements. Suggestion Add clarification that principles 3, 4 &amp; 5 can be met at the landscape level.</td>
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Instruction Document 2E

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<tr>
<td>664</td>
<td>Section 3 Chain of custody requirements. The section is not clear enough to confirm during audit that the BP is solely responsible for CoC requirements. Suggestion Add: Records must be retained for five years.</td>
</tr>
<tr>
<td>665</td>
<td>Section 3 Chain of custody requirements. The section is not clear enough to confirm during audit that the BP is solely responsible for CoC requirements. Suggestion Reword: As part of the stakeholder consultation process the BP shall make the results of the RBA and the mitigation measures implemented publicly available upon request.</td>
</tr>
<tr>
<td>666</td>
<td>Section 3 Chain of custody requirements. The section is not clear enough to confirm during audit that the BP is solely responsible for CoC requirements. Suggestion The RRA should be reviewed every 5 years as with other schemes. Yearly review is not a value adding exercise. Most publicly available information does not get verified that often. Assuming an extension of the RRA process for Cat 2 consider rewording: The BP shall conduct a review of the risk assessment and the mitigation measures at least every 5 years. More frequently if there are relevant developments in the homogeneous region(s) from which feedstock is sourced, or relevant changes in the information gathered for a homogeneous region or indicator.</td>
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### Instruction Note 5E

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<tr>
<td>667</td>
<td>Section 3 Chain of custody requirements. The section is not clear enough to confirm during audit that the BP is solely responsible for CoC requirements. Suggestion Add: (from ADBE Dec 2019 report section 3 Summary of findings on scheme SBP, item 3.1): SBP certification starts at the biomass producer, which for the RBA is in line with the condition on the first link in the Chain-of-Custody (CoC) from Dutch sustainability criterion 12.6. For group certification the commission has earlier concluded that SBP meets the requirement from Table 2 in Annex D of the Dutch regulation that conformity assessments start at the FMU. More details on this conclusion can be found in the ADBE’s public assessment report on SBP from December 2018.</td>
</tr>
<tr>
<td>633</td>
<td>Section 3.3 Defining biomass batches, transferring this information throughout the supply chain and ensuring sustainability information remains attached is a critical component of mass balance and is not covered by FSC/PEFC controls systems. This information should therefore be stated under standard 4 or a new mass balance standard. Suggestion Reword: Where enforcement of laws, regulations or protections does not exist the Biomass Producer has implemented appropriate control systems and procedures for verifying that production of feedstock does not endanger food, water supply or subsistence means of communities, where the use of this specific feedstock or water is essential for the fulfilment of basic needs. Add to examples of means of verification: World Bank Governance Indicators.</td>
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<tr>
<td>634</td>
<td>Section 6.4.6This clause often results in BPs reporting a very large number of feedstock groups. Current reporting of weighted average and maximum distance should be sufficient to all end users, where GHG emissions can either be calculated accurately (using weighted average) or conservatively (using maximum distance). Suggestion Reword: Where enforcement of laws, regulations or protections does not exist the Biomass Producer has implemented appropriate control systems and procedures for verifying that appropriate mechanisms are in place for resolving grievances and disputes, including those relating to tenure and use rights, to forest management practices and to work conditions. Add to examples of means of verification: World Bank Governance Indicators.</td>
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### Basic issues

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<tr>
<td>671</td>
<td>WGs clear on scope for each of the standards.</td>
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<tr>
<td>672</td>
<td>Sharing glossary - create some kind of flag for WG members when glossary points discussed in another WG.</td>
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### Co-recognition

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<tr>
<td>692</td>
<td>Other schemes: The correlation with ISCC will need looking at I believe if SBP may be pressed to include non-woody biomass by stations that are co-firing or making</td>
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different types of pellets. ISCC seems to be a well-known scheme though more for biofuels.

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<tr>
<td>696</td>
<td>Agree that divergence seems unusual and does not make sense; there are already other schemes dealing with non-woody (ISCC), I cannot see the benefit of competing, only recognition like FSC/PEFC.</td>
</tr>
<tr>
<td>712</td>
<td>As part of the standard revision process, SBP will consider which other sustainability claims to accept and how much trust to ascribe to them.</td>
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**Monitoring and Evaluation**

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<tr>
<td>677</td>
<td>Regarding intended outcomes and Monitoring &amp; Evaluation of Standard 3, as we discussed on the 12th Feb, the main one relates to “Providing assurance of legal and sustainable practice”: Secondarily also these two would be relevant: “Realising best practice” and “Achieving recognition by regulatory authorities”.</td>
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**Pilot**

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<tr>
<td>694</td>
<td>Testing the new standard: No single Certification Body should be allocated. There are already enough conflicts of interest in this arena already.</td>
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**Standards Development Process**

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<tr>
<td>673</td>
<td>Is one single editor required for all standards?</td>
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<tr>
<td>674</td>
<td>Normative interpretations - carefully consider normative interpretations &amp; when they should be included and when they shouldn’t; can affect quality of standard.</td>
</tr>
<tr>
<td>688</td>
<td>Paper 3, Standard revision process: the process makes sense if I understand correctly; draft V0 written I assume by SBP staff, then development process, WG then revision then consultation. Otherwise a consensus may not be reached and this would go on for ever (e.g. like the ISO chain of custody WG that was ridiculous).</td>
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<tr>
<td>689</td>
<td>Draft ToR S1-6. I do not understand the following intentions and their origination: 1. Unlocking the potential of biomass in a sustainable way</td>
</tr>
<tr>
<td>690</td>
<td>Draft ToR S1-6. I do not understand the following intentions and their origination: 2. Ensuring greater visibility of the supply chain.</td>
</tr>
<tr>
<td>691</td>
<td>Draft ToR S1-6: Perhaps this is evidenced already (sustainable use of biomass). Perhaps: 1. Ensuring legal and sustainable feedstock? 2. Guaranteeing chain of custody of feedstocks? 3. Plus, facilitating greenhouse gas emissions data and legal and sustainable feedstock characteristics to be communicated through supply chains?</td>
</tr>
<tr>
<td>693</td>
<td>Achieving consensus: This is like some of the ISO standards, normally there are dominant few with strong opinions so hopefully a ‘speak-up’ culture will be adopted and this point raised at the start of the meetings. Facilitator is good. Great idea.</td>
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<tr>
<td>681</td>
<td>Does SBP need a policy of association? What are other schemes doing? Are there any good examples? SBP is not a membership organisation so won’t have a code of conduct; but has to protect its brand and assurance from the most controversial aspects of woody biomass. PoA could be a set of basic criteria SBP wants to avoid; check people are managing; and can revoke right to use SBP claim if they don’t adhere? Should SBP take the same route as FSC and PEFC plus a carbon one? Something else? FSC on top of their PoA have a process for due diligence before someone is allowed to use their trademark; then a process for review where needed</td>
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if this something comes up/a complaint. Also doing some work around their policy for conversion. They are looking at compensation/restoration for conversion basically. RSPO has a membership code of conduct… MSC does some extra checks around labour depending on risk, but struggling to see where they manage this sort of thing.