



Standards Development Process

Standards Development Process: Standard 3 Revision Draft v0

Sustainable Biomass Program
sbp-cert.org



Revision Draft v0

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Document history

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Foreword

To support the Working Groups in the development of Revision Draft v1 for Standards 1 to 4, the Secretariat has developed a Revision Draft v0 of those standards.

Revision Draft v0 has taken the current standards and marked them up with track changes, comments and highlights drawing attention to issues for consideration. The following elements have fed into the development of Revision Draft v0:

- Collation of Standards 1 and 2 into one document;
- General comments from other certification systems and SBP stakeholders;
- Gap analysis of the standards;
- Feedback from stakeholders on key elements of current standards requiring revision; and
- Identification of potential new content.

This document relates to Standards 1 and 2. Other relevant documents for consideration by the Working Groups include:

- Public Summary;
- Terms of Reference;
- Working Groups Terms of Reference;
- Document Development Procedure;
- Current SBP standards;
- Normative Interpretations;
- Gap Analysis;
- Stakeholder Survey Results;
- Sustainability Certification Landscape;
- Overview of Definitions of Biomass Sustainability Within Key Markets; and
- Draft Theory of Change.

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Commented [A1]: Gap assessment :

Standard 3 – opportunities

- Instead of using FSC/ PEFC underlying accreditation and link to system used to audit client – replace by just ref to 17021
- Keep FSC/ PEFC accreditation as way of ensuring general competence of CAB for SBP certification services
- Limit ST3 to SBP specific topics [e.g. is in 17021; e.g. look at ISO 9001 – only add reqs for competency for auditor; e.g. for SBP stakeholder consult]
- Combined section 5 and 6 [probably outdated; as now following 17021 cant do this]
- Define accreditation scope requirements
 - Define certification scopes requirements (ref. To SBE countries and feedstock types) and link them to accr. Scope.[for WG to consider. Scope tech: 1 a)BP SB or 1b) SBE; and 2) supply chain. [AA added the numbering to ease reading]]. BP accredited if FM accredited, Supply chain accredited if CoC accredited.
- Define sampling requirements: at the level of FMUs, secondary supply chains, and for evaluating mitigation measures
 - Define audit time and certification decision requirements
 - Clarify the point and methods for effective stakeholder engagement - copy to section 9
 - Clarify the point and methods for COC evaluation: cover critical control points & conversion factors move to 10.4.4.
 - Specify competence requirements for auditing SBEs and PEFC/ FSC COC
 - Specify competence requirements for peer reviewing move to 8.3.



List of abbreviations

BP	Biomass Producer
CPET	Central Point of Expertise for Timber (run by DEFRA)
CB	Certification Body
CoC	Chain of Custody
CHP	Combined Heat and Power
CITES	Convention on International Trade in Endangered Species
DEFRA	UK Department for Environment, Food and Rural Affairs
DECC	UK Department of Energy and Climate Change
EUTR	European Union Timber Regulation
FM	Forest Management
FMS	Forest Management Scheme
FSC®	Forest Stewardship Council
GRI	Global Reporting Initiative
GGL	Green Gold Label
GHG	Greenhouse Gas
ILO	International Labour Organisation
LVS	Legality Verification Systems
LAV	Locally Applicable Verifiers
PPE	Personal Protective Equipment
PEFC	Programme for the Endorsement of Forest Certification
RRA	Regional Risk Assessment
RA	Risk Assessment
RSB	Roundtable on Sustainable Biomaterials
SVP	Supplier Verification Programme
SB	Supply Base
SBE	Supply Base Evaluation
SBR	Supply Base Report
SBP	Sustainable Biomass Partnership
SFI	Sustainable Forestry Initiative

1 Background

The Sustainable Biomass Partnership (SBP) was formed in 2013 by European utilities that are using biomass, mostly in the form of wood pellets or chips, in large thermal generating plants. Biomass-fired power and heat generation is seen as an important technology for achieving the EU's 2020 renewable energy targets and EU member states are adopting their own national approaches to ensuring that the biomass used is legally and sustainably sourced.

SBP's objective is to develop the tools necessary to demonstrate that, as a minimum, solid biomass used for energy production meets these national requirements. The SBP Framework is designed as a clear statement of principles, standards and processes necessary to demonstrate such compliance. Wherever possible, the Framework takes into account and builds on existing regulatory mechanisms and on voluntary certification standards already applied to other forest product streams or to other biomass sources.

The SBP Framework provides a means to collect data describing the nature of the feedstock as well as data to be employed in the regulatory calculations of greenhouse gas (GHG) savings from its use. It also provides a means to demonstrate that risks to forest carbon stocks are managed and that forests' carbon sequestration capability is maintained.

Collectively, the six SBP Standards represent a certification framework, or scheme, against which organisations can be assessed for compliance by independent third-party Certification Bodies (CBs). An organisation that satisfactorily demonstrates compliance receives a certificate and is entitled to make SBP claims in relation to its biomass.

The SBP Framework is made freely available for use by all supply chain actors irrespective of whether or not they are members of SBP.

Commented [A2]: Have not touched this – should be done at the very end.



2 Scope

This document provides additional scheme-specific requirements for Certification Bodies providing certification services against any SBP standard.

▼

Deleted: <#>¶
<#>In cases where documented SBP requirements require further interpretation, this will be provided on a publicly available internet platform managed by SBP.¶
<#>The SBP will conduct an interim process of approval of CBs. CBs shall be required to demonstrate their capacity to implement the SBP requirements. Lead auditors and personnel in the review and certification decision-making process shall have successfully completed an SBP-approved training course. The performance of CBs shall be monitored on an ongoing basis, including the review of all audit reports by the SBP prior to the certification of BPs.¶
<#>A process for the accreditation of CBs may be introduced at a later stage.¶



3 Normative references

[ISO/IEC 17000, Conformity assessment – Vocabulary and general principles.](#)

[ISO/IEC 17021, Conformity assessment – requirements for bodies providing audit and certification of management systems. Part 1: Requirements.](#)

[ISO/IEC 17021, Conformity assessment – requirements for bodies providing audit and certification of management systems. Part 2: Competence requirements for auditing and certification of environmental management systems.](#)

[ISO 19011, Guidelines for auditing management systems.](#) SBP Standard 1: Feedstock Compliance Standard

SBP Standard 2: Verification of SBP-compliant Feedstock

SBP Standard 4: Chain of Custody

SBP Standard 5: Collection and Communication of Data

SBP Standard 6: Energy and Carbon Balance Calculation

Deleted: ISO/IEC 17065:2012 Conformity assessment -- Requirements for bodies certifying products, processes and services[¶]

Deleted: <#>Standards from SBP-approved FM schemes (FSC® and PEFC)¶
<#>Standards from SBP-approved CoC schemes (see Table 1)¶



4 Glossary of terms and definitions

Please refer to separate *SBP Glossary of Terms and Definitions ISO/IEC 17021 and ISO/IEC 17000*.

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5 Principles

5.1 General

5.1.1 For BP certification, CBs shall be accredited by either Accreditation Services International (ASI) or a National Accreditation Body to provide FSC® or PEFC Forest Management certification.

Deleted: Accreditation requirements

5.1.2 For CoC certification, CBs shall be accredited by either Accreditation Services International (ASI) or a National Accreditation Body to provide FSC® or PEFC Forest Management certification.

Deleted: the evaluation of the BP's management systems

5.1.3 The geographical scope of the FSC, PEFC or SFI accreditation (FM or COC) shall be equivalent to the applicable scope for SBP certification (BP or COC respectively).

Deleted: hold valid FSC®, PEFC, or SFI CoC accreditation

5.1.4 CBs shall comply with ISO/IEC 17021.
5.2 Impartiality

Deleted: supply chain or forest management

Deleted: supply chain or BP's management systems evaluation

Deleted: 3

Deleted: operate SBP certification in compliance

Deleted: the requirements of

Deleted: 17065:2012 Conformity assessment – Requirements for bodies certifying products, processes and services

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5.4 For certification against SBP Standard 5: Collection and Communication of Data and SBP Standard 6: Energy and Carbon Balance Calculation, additional requirements may be found in Instruction Document 5A and relevant country specific Instruction Documents relating to Standard 6.

Commented [A3]: Is it relevant to:

- 1) Expand this to cover response to stakeholder comments instead of just complaints?
- 2) Explicitly require a response to complaints/ comments about underlying schemes such as FSC/ PEFC/ SFI?

If so this would be one place to add those extra SBP requirements.

Commented [A4R3]: Reviewer comment: agree that the complaint section should be related to stakeholder comments. These may not necessarily be complaints but may still require action or response from the certificate holder.

5.3 Competence

5.4 Responsibility

5.5 Openness

5.6 Confidentiality

5.7 Responsiveness to complaints

5.8 Risk-based approach



6 General requirements

6.1 Legal and contractual matters

6.2 Legal responsibility

6.3 Certification agreement

6.4 Responsibility for certification decisions

6.5 Management of impartiality

6.5.1 The committee for safeguarding impartiality may include a representative from the stakeholders that are directly relevant to the SBP scheme, such as national representatives of SBP, FSC, PEFC or SFI. These entities at least shall be informed about this option.

6.6. Liability and financing

Commented [A5]: Once 17021 is fully adopted and any scheme specific requirements specified in this standard (3) there is actually no need to use FSC/ PEFC/ SFI as a prop. So all this content can be deleted. Instead the WG should focus if there is any need to define any requirements in addition to those in 17021 section 5 General requirements.
I would say it is not, so I just copied the 17021 titles into here to indicate that.

Deleted: 6.1→For audits undertaken on companies operating a FSC® based management system, the CB shall implement all relevant requirements of FSC-STD-20-001 V3-0 EN: General requirements for FSC® accredited Certification Bodies: application of ISO/IEC Guide 65:1996 (E).
6.2→For audits undertaken on companies operating a PEFC based management system, the CB shall implement all relevant requirements of PEFC, Annex 6, Certification and Accreditation procedures.

6.3→For audits undertaken on companies operating a SFI based management system, the CB shall implement all relevant requirements of SFI, SFI 2010-2014, Section 9. Audit procedures and auditor qualification and accreditation.
6.4→For audits undertaken on companies operating FSC®, PEFC or SFI CoC systems the CB shall implement all relevant requirements as shown in the table below.
Scheme ... [1]

Commented [A6]: Any scheme specific requirements for this should be moved to this section (currently they are further on); they are now called "client contracts" but recommend to change to equivalent ISO concept of "certification agreements".

Commented [A7R6]: Reviewer comment: Agreed.



7 Structural requirements

Deleted: Basic

Deleted: principles

7.1 An SBP certificate issued by a CB provides a credible assurance that there is no major failure in conformance with the requirements of the applicable SBP Standard across the entire scope of the certificate.

7.2 In order to provide such an assurance, the CB shall:

- a) Analyse and describe any and all of the following that apply to the organisation:
 - Structure, operation, inputs and outputs
 - CoC system
 - Critical control points
 - Greenhouse gas (GHG) data collection
 - The Supply Base Evaluation (SBE), including SBE scope
 - Implementation of the Instructions for Biomass Producers for the development of Locally Applicable Verifiers.
 - Risk scoring of each Indicator at both Risk Assessment (RA) and Supplier Verification Programme (SVP) stages
 - Effectiveness of any mitigation measures implemented as part of the SBE
 - Staff competence in meeting SBP requirements
 - Competence of the organisation responsible for conducting the SBE (whether internal or external).
- b) Confirm that the organisation's management system is capable of ensuring that all requirements of the standards are implemented across the entire scope of the evaluation.
- c) Conduct adequate and appropriate sampling and review of sites, documents, management records, interviews, consultations with stakeholders and direct observations, in order to verify that there is full conformance with the performance thresholds specified in the applicable standards.
- d) Confirm that the certificate holder complies with all the CB's and SBP's requirements regarding claims, logos, certification marks and trademarks.

7.3 In addition to the specified FSC®, PEFC and SFI scheme specific certification requirements, the CB shall also implement the requirements for surveillance audits set out in Instruction Notes 3A, 3B, 3C and 3D of this document.

Commented [A9]: This content needs to be moved into the section further on process requirements. I have not done any of that in this version of the document.

7.1 Organizational structure and top management

7.2 Operational control



8 Resource requirements

8.1 The certification body shall ensure that all personnel carrying out the key activities, such as application review, auditing, granting of certification, monitoring of auditors, etc. have the relevant and appropriate competencies corresponding to these activities. **8.2 Personnel involved in the certification activities**

8.2.1 Auditors

8.2.1.1 Education

The certification body shall ensure that auditors have the knowledge corresponding to at least a tertiary education.

8.2.1.2 Forest management training

(...?)

8.2.1.3 Audit training

8.2.1.3.1 The certification body shall ensure that auditors have successfully taken the initial auditor training courses approved by SBP.

8.2.1.3.2 The certification body shall ensure that active auditors have successfully taken any auditor training courses that are required to maintain competence (example: after standard revision) approved by SBP.

8.2.1.3.3 The certification body shall ensure that active auditors maintain their competence regarding SBP interpretations, CB procedures and best audit practice through regular training events.

8.2.1.4 Working experience

8.2.1.4.1 The certification body shall ensure that the auditor has a minimum of three (3) years full time experience in the forestry sector.

8.2.1.5 Audit experience

8.2.1.5.1 For a first qualification of an auditor, the certification body shall ensure that the auditor within the last three years has performed forest management audits for at least four client organisations under the leadership of a qualified auditor.

8.2.1.5.2 For maintaining the qualification of the auditor, the certification body shall ensure that the auditor has performed a minimum of five (5) external audits per year including at least two (2) forest management audits where the sum of these audits should cover at least seven (7) man-day of audit work.

8.2.1.6 Competencies

The certification body shall ensure that auditors demonstrate ability to apply knowledge and skills in the following areas:

- a) principles and requirements of the applicable standards;
- b) audit principles, procedures and techniques;
- b) health and safety and social and cultural values and issues in the Supply Base;
- c) business management practices, biomass production and supply chain issues;
- e) legislation, regulations or other relevant requirements applicable to the auditee;
- f) forest management in the Supply Base;
- g) ecological values and nature conservation issues in the Supply Base;
- h) language skills appropriate to all stakeholders.

Deleted: Competence

Deleted: The CB shall employ, or have access to, a sufficient number of personnel to cover its operations related to the certification schemes and to the applicable standards and other normative documents.[¶]
8.2. The personnel shall be competent for the functions they perform, including making required technical judgments, defining policies and implementing them.[¶]
8.3. The CB shall implement the requirements of ISO/IEC 17065:2012(E) section 6.1.2 Management of competence for personnel involved in the certification process.[¶]
8.4. The CB shall ensure that the audit team undertaking an audit of a BP has the combined necessary knowledge and experience to evaluate against the SBP Feedstock Compliance Standard in the local context of the Supply Base (SB), including:[¶]
Knowledge of ecological and social values associated with the SB[¶]
Knowledge of applicable laws and regulations[¶]
Knowledge of business management practices[¶]
Knowledge of operation of suppliers, including management systems and products[¶]
Knowledge of the local forest resource[¶]
Language skills appropriate to all stakeholders[¶]
8.5. The CB shall ensure that the audit team undertaking an audit against any SBP Standard has the combined necessary knowledge and experience to evaluate against that Standard.[¶]
8.6. Lead auditors and personnel in the review and certification decision-making process shall be approved by SBP for their tasks at the time of undertaking those tasks. Confirmation of approval is available to CBs from SBP.[¶]



8.2.2 Audit Team

The audit team shall be comprised of by auditor(s) fulfilling the requirements defined in X above. In some cases technical experts may be required to support the required auditor competency in a particular technical area by providing appropriate technical expertise. The CB shall ensure that the audit team has the combined competence required.

8.3 Use of individual external auditors and external technical experts

8.4 Personnel records

8.5 Outsourcing

Commented [A11]: ISEAL Assurance Code 5.1.4 Use of technical experts.

The scheme owner shall require that interpreters or technical experts employed by assurance providers or oversight bodies are independent of the client, unless this is not feasible due to logistical constraints. In all cases, the names and affiliations of these experts shall be included in audit reports.



9 Information requirements

9.1 During the main audit of the BP and the re-certification audit, the CB shall undertake a stakeholder consultation process.

Commented [A12]: Also WG to consider re engagement; not just pub consult exercise.

Deleted: Certification Body stakeholder consultation

9.2 During the stakeholder consultation process, the CB shall identify relevant individuals and organisations interested in and affected by the operation of the applicant BP. CBs are not expected to identify and consult all possible stakeholders, but shall consult with a sufficient number of affected stakeholders in order to verify that management systems (documented or undocumented) are working effectively and consistently under the full range of conditions present in the area under evaluation.

Formatted: Underline

9.3 The CB shall consult with stakeholders included in the BPs SBE consultation and the Locally Applicable Verifiers (LAVs) process. As a part of the CB consultation the CB shall determine if stakeholders' comments were adequately addressed by the BP.

Formatted: Underline

9.4 The CB shall give stakeholders at least one month's notice of the audit. Notification shall include adequate information to enable stakeholders to make informed comments, but shall not include sensitive or commercially confidential information.

Formatted: Underline

9.5 The CB shall encourage stakeholders to submit relevant information to the CB, in order to evaluate compliance of the BP with SBP requirements.

9.6 During the audit process, the CB shall review all submissions and evaluate those that are relevant. All submissions shall be recorded and the CB shall document actions taken in relation to relevant submissions, and the conclusions of the CB regarding compliance of the BP with the Standards.

9.7 CBs are not required to undertake a stakeholder consultation process during surveillance audits. However, all submissions received by the CB regarding the compliance of a certified BP, shall be recorded. If submissions contain information relevant to compliance with SBP requirements, the CB shall evaluate the comments as they affect the certification, during or prior to the next audit, as appropriate.

9.8 Records of evaluations and outcomes of all stakeholder consultations shall be maintained for at least five years.

Commented [A13]: This needs to be reviewed and improved by the WG as they see fit. I have kept all the old text but also added some new one from PEFC FM – for WG inspiration.

9.1 Publicly accessible information

The certification body shall make a summary of the audit report which shall be made publicly available by the certificate holder (...). Confidential data can be excluded.

Commented [A14R13]: Reviewer comment: we may need to provide clarification /guidance as to the term "adequate".

9.2 Certification documents

Certification bodies shall add to the certificate an accreditation mark as prescribed by the accreditation body (including accreditation number where applicable), and the date of granting, extending or renewing certification and the expiry date or recertification due date. The effective date on a certification document shall not be before the date of the certification decision.

Commented [A15]: WG should decide how to expand this part with what was Instruction Note 3E, which I have not changed at all. That IN needs to be moved to here.

Commented [A16]: There is a section on certificates further ahead that needs to be incorporated here instead.

9.3 Directory of certified clients

(...)

Commented [A17]: Here there should just be a reference to the SBP database, and that CBs must keep it updated.

9.4 Reference to certification and use of marks

Commented [A18]: Do we need any specific guidance for CB and/or CH use of logos?

Commented [A19R18]: Reviewer comment: Which logos? CB's, accreditation bodies, SBP?

9.5 Confidentiality



The certification body shall inform the client organisation that it is obliged to provide information to the accreditation body and SBP. In order to comply with the ISO/IEC 17021 requirements for confidentiality, the certification body shall have the written consent of the client organisation for the information disclosed to these entities.

9.6 Information exchange between a certification body and its clients



10 Process requirements

10.1 Where a certificate is issued to a BP, the CB shall make available a public summary of its audit of the BP. Additional requirements are included in Instruction Note 3E in this Standard.

10.2 CBs shall download and use the current version of reporting templates as listed by SBP on the SBP website.

Note: The listing of a reporting template on the SBP website shall mean that its use is mandatory.

10.3 Main evaluation reports, surveillance reports, public summary reports and updates shall be submitted to SBP no later than ninety (90) days after the on-site closing meeting at the end of a CB audit.

10.4 The basic quantitative information for each certificate shall be entered and updated in the SBP database of registered certificates at each evaluation as required by SBP.

10.1 Pre-certification activities

10.1.1 Application

10.1.2 Application review

10.1.3 Audit program

10.1.4 Determining audit time

10.1.5 Multi-site sampling

10.1.6 Multiple management systems standards

10.2 Planning audits

10.2.1 Determining audit objectives, scope and criteria

10.2.1.1 The criteria against which the auditee is evaluated are those outlined in latest version of the applicable SBP standards, and relevant mandatory interpretations.

Note: The latest version of the standards and their amendments are available from the SBP website (X).

10.2.2 Audit team selection and assignment

10.2.3 Audit plan

10.3 Initial certification

10.3.1 Initial certification audit

10.4 Conducting audits

10.4.1 General

10.4.2 Conducting the opening meeting

10.4.3 Communication during the audit

10.4.4 Obtaining and verifying information

10.4.5 Identifying and recording audit findings

10.4.6 Preparing audit conclusions

10.4.7 Conducting the closing meeting

10.4.8 Audit report

10.4.9 Cause analysis of nonconformities

10.4.10 Effectiveness of corrections and corrective actions

10.5 Certification decision

10.5.1 General

Commented [A20]: One thing I have NOT included here is the requirements for group certification. But this would be needed – ie WG needs to specify rules for auditing groups, because these are not covered by ISO. ISO only cover multi-site certificates, which are different.

Below are all the titles from the core section of 17021 – I would say very little needs additional specification. I have left some tips for topics that might need expansion/ decision.

Commented [A21]: See ISEAL Assurance Code clause 5.1.8 The scheme owner shall define a decision making protocol for compliance assessment that enables consistent determination of levels of non-conformity, and shall require assurance providers to implement it. Guidance "Examples of decision-making protocols can include scorecards, traffic light systems, critical criteria, etc."

Deleted: Certification Body reporting

Commented [A22]: This text needs to be streamlined and incorporated into the previous section on information requirements instead of staying here.

Commented [A23R22]: Reviewer comment: Agreed.

Commented [A24]: Establish minimum audit time? This has been flagged as needed in annual CAB meetings
Cover combined audits with FSC / PEFC/ SFI etc audits? This often happens

Commented [A25R24]: Reviewer comment: It might be necessary to provide guidance for audits that are conducted in isolation and those that are combined with other audits.

Commented [A26]: WG could consider here FMU sampling for example. May not be 'multi-site'; consider title.

Commented [A27]: ISEAL Assurance Code: 5.1.3; Sampling within the assessment: The scheme owner shall define a sampling procedure for assurance providers to use during the assessment that includes, at minimum, a description of when sampling is to be employed in the assessment, the depth and intensity of sampling, and guidelines for the type of sampling to be employed in each instance.

Guidance: Sampling within the assessment means defining the basis on which auditors will determine what to look at during the assessment, e.g. the most common problematic issues, the issues with the highest risk, the easiest issues to check, etc. This can include determining the selection of a sample within a group or multi-site.

Commented [A28R27]: Reviewer comment: are we talking about the same thing here? Sampling as defined above refers to the determination of a sufficient sample of objective evidence to verify compliance, whereas is not this section referring to the methodology for selecting a sample of participating sites to verify in a multi-site audit (?). ... [2]

Commented [A29]: Require distinction between major and minor NCs?

If so then deadlines for CA should be specified accordingly too

Commented [A30R29]: Reviewer comment: Major / minor non-conformities and also Opportunities for Improvement / Comments for Action?

Commented [A31]: Insert here existing SBP requirements on the topic



[10.5.2 Actions prior to making a decision](#)
[10.5.3 Information for granting initial certification](#)
[10.5.4 Information for granting recertification](#)

[10.6 Maintaining certification](#)

[10.6.1 General](#)
[10.6.2 Surveillance activities](#)

[10.6.3 Recertification](#)

[10.6.3.1 In a cycle of five years the certification body carries out re-certification audits in order to demonstrate that the applicant continues to comply with all applicable requirements.](#)

[10.5 Special audits](#)

[10.6 Suspending, withdrawing or reducing the scope of certification](#)

[10.6.1 The certification body shall advise SBP in writing, within a defined period if certification is suspended or withdrawn, or where there are any changes in decisions relating to the status of certification of an organization, and the reasons for those decisions.](#)

[10.7 Appeals](#)

[10.8 Complaints](#)

[10.8.1 The complaint procedure of a certification body shall include procedures for the following aspects:](#)

- [a\) Acknowledgement of receipt of the complaint](#)
- [b\) Provision of progress reports and the outcome to the complainant](#)
- [c\) Giving formal notice of the end of the complaint-handling process to a complainant.](#)

[10.9 Client records](#)

Commented [A32]: See ISEAL Assurance Code clause 5.1.8 The scheme owner shall define a decision making protocol for compliance assessment that enables consistent determination of levels of non-conformity, and shall require assurance providers to implement it. Guidance "Examples of decision-making protocols can include scorecards, traffic light systems, critical criteria, etc."

Commented [A33]: Insert here existing instruction notes A B C

Commented [A34]: The scheme owner shall require assurance providers and oversight bodies to implement a publicly available appeals procedure whereby clients and assurance providers respectively can appeal assessment decisions.



11 SBP certificates

11.1 The CB shall issue certificates using the latest version of the SBP certificate template. This is available for downloading from the SBP website.

11.2 Certificates shall be numbered using the form:

SBP-XX-YY

Where:

SBP does not change

XX- is a 2 digit number allocated to the CB by SBP

YY- is a unique 2 digit integer specific to the certificate holder.

Note: The CB may add additional '0' (zero) values in front of the 'XX' and 'YY' values where this facilitates integration with existing data systems.

Commented [A35]: Should be incorporated into the section on certification documents, which is part of the Public information section. I have not done it here – up to WG to decide what should be kept as documented explanations, rather than just need to use an SBP approved template.

Deleted: <#>Certification of generators against regulatory requirements!
<#>12.1 Requirements are set out in SBP Standard 6: Energy and Carbon Balance Calculation.||



12 Client contracts

Adapted from reference text: *General requirements for FSC®-accredited Certification Bodies. FSC-STD-20-001 V3-0 EN*

Commented [A37]: Should be incorporated into section 6.3 instead of being a separate section. Streamlining probably required.

Contracts between BP applicants (the “**Clients**”) and CBs must include the following:

13.1 The relevant provisions ensuring the right of the CB and SBP and their respective authorised agents at any reasonable time to have access to the Client’s premises (or to arrange for such authorised representatives to have access to other relevant premises owned or controlled by the Client or its group companies) for the purpose of inspecting and taking copies of any information, documentation, goods, books and records deemed necessary by the CB or SBP.

13.2 The relevant provisions ensuring the Client is required to promptly provide to the CB and SBP and their respective authorised agents all such information, documentation books and records deemed necessary by the CB or SBP.

13.3 The relevant provisions ensuring the right of the CB and/or SBP to use and process any information relating to the Client or otherwise provided by or through the Client including but not limited to any Supply Base Report (SBR); CB public summary reports; data required by SBP for GHG calculations and regulatory reporting; any data required by SBP to be supplied to the Client’s purchaser/customer with each batch of biomass supplied or sold.

13.4 The conditions and terms necessary for a Client (as a holder of a certificate issued by the CB) to comply with on an on-going basis in order to maintain a certificate issued by the CB (the “**Certificate**”) shall include that the Client:

- 13.4.1 complies and continues to comply with all the CB’s conditions and terms for maintaining, renewing and re-issuing of the Certificate, including but not limited to the full implementation of any actions required to correct minor non-conformances that were identified prior to the issue of the Certificate;
- 13.4.2 complies and continues to comply with all the CB’s and SBP requirements, arrangement and licences regarding claims, logos, certification marks, trademarks or any other intellectual property rights of the CB and SBP;
- 13.4.3 corrects any major non-conformances with the applicable standard(s) within the minimum period specified by the CB;
- 13.4.4 undergoes surveillance as determined by the CB; and
- 13.4.5 complies and continues to comply with all agreements and arrangements between the Client and SBP and all SBP requirements.

13.5 In the event that the CB suspends, terminates or withdraws a Certificate the Client shall

- 13.5.1 immediately at its own expense remove SBP’s name (in any form), initials, logo, certification mark, trademarks and intellectual property from its products, information, website, documents, advertising or marketing or any other materials;

- 13.5.2 immediately cease and desist from using (including by the Client’s group companies) SBP’s name (in any form), initials, logo, certification mark, trademarks and intellectual property;



13.5.3 immediately cease to sell any products with SBP claims or references or SBP name or any SBP marks or any intellectual property relating to SBP or make any claims or representation (oral or written) that imply that it complies with the requirements of the Certificate, CB or SBP;

13.5.4 where a product (including biomass) has been supplied with an SBP-compliant claim or representation or mark, immediately identify all relevant customers/purchasers who are in receipt of, or have ordered, such product, and notify each of such customers/purchasers of the suspension, withdrawal or termination (as the case may be) in writing within three (3) business days of the suspension, withdrawal or termination and maintain records of such notification;

13.4.5 provide such co-operation and information as may be required by CB or SBP to enable CB or SBP to verify and confirm that the Client is in compliance with all its obligations to CB and SBP.

13.6 That on withdrawal or termination of the Certificate, the Client shall promptly return the original and all copies of the Certificate to the issuing CB or destroy the original, and commit to destroy any electronic copies and hardcopies in its possession or control.

13.7 In the event that the CB suspends, terminates or withdraws a Certificate, it shall promptly (and in any event within three (3) business days of the suspension or withdrawal or termination) notify SBP in writing of the same and such notification shall state the action taken and the effective date and reason of suspension or withdrawal or termination.

13.8 That both the CB and SBP shall be entitled and authorized to process the Client's personal data and business data (so far as is necessary for the purpose of performance obligations to CB and/or SBP) in accordance with Directive 95/46/EC of the European Parliament and of the Council on the protection of individuals with regard to the processing of personal data and on the free movement of such data, and any other applicable data protection legislation.



Instruction Note 3A: General Surveillance - SBP requirements for CBs

Adapted from Reference Source: *General requirements for FSC® accredited certification bodies: application of ISO/IEC Guide 65:1996 (E) FSC-STD-20-001 (Version 3-0) EN*

See also: *Surveillance (ISO/IEC Guide 65: 1996 (E) Clause 13)*

1 Surveillance evaluations of SBP certificate holders shall take place annually (i.e. every 12 months), or more frequently, depending on factors such as:

- a) The scale of the operation (e.g. the area of the SB, the quantity of material manufactured, or the value and/or volume of material traded)
- b) The intensity of resource management in the case of a SB (e.g. the frequency and level of timber harvesting)
- c) The complexity of the CoC control system
- d) The ecological sensitivity of the SB to management intervention
- e) The experience and performance record of the personnel involved (e.g. managers, staff, contractors)
- f) The number and nature of any non-conformances identified by the CB
- g) The number and nature of any complaints submitted by stakeholders.

2 The CB shall assign one or more persons who were independent of the audit to decide whether or not to continue, suspend or withdraw certification based on their review of surveillance activities.

Commented [A38]: Should be incorporated into section on Process requirements instead of being a separate section

Commented [A39R38]: Reviewer comment: agreed



Instruction Note 3B: Surveillance of Biomass Producers – SBP requirements for CBs

Adapted from Reference Source: FSC-STD-20-007 (V3-0) EN: Forest management evaluations

1 Surveillance

1.1 General requirements

1.1.1 The CB shall carry out a surveillance evaluation to monitor the certificate holder's continued conformance with applicable certification requirements, at least annually (i.e. every 12 months).

1.1.2 For certificates with a duration of five years, at least four surveillance evaluations shall take place before the certificate expires.

1.1.3 The CB shall carry out one or more annual on-site visits for all BP certificate holders.

1.1.4 Surveillance evaluations shall follow clear, documented procedures and shall include the elements specified in this Standard.

1.1.5 The CB shall have documented procedures for surveillance which include:

- a) Evaluation of the certificate holder's compliance with all conditions and subsequent corrective actions, on which certification is based
- b) Review of any complaints or allegations of non-compliance with any aspect of the applicable SBP Standards
- c) Evaluation of an adequate and appropriate sample of sites and records, and interviews with a sufficient number of affected stakeholders, in order to verify that management systems (documented or undocumented) are working effectively and consistently, under the full range of conditions present in the area under evaluation.

1.1.6 During annual surveillance evaluations, the CB may focus on specific elements of the applicable SBP Standards, including particular SBP principles or aspects of management, thereby reducing the duration and cost of surveillance. However, all aspects of the SBP Standards shall be monitored during the period of validity of the certificate.

1.2 Review of documentation and records

1.2.1 The CB shall review:

- a) Any changes to the area included in the scope of the SBE, including additions, exclusions, or SB area changes
- b) Changes to the certificate holder's management system
- c) Complaints received
- d) Training records
- e) Operational plan(s) for the next 12 months
- f) Feedstock supply records
- g) Records of sales of SBP-certified products (copies of invoices, bills, shipping documents)
- h) Records of the RA, SVP and monitoring carried out
- i) Records of any mitigation measures and their subsequent monitoring.

Commented [A40]: Should be incorporated into section on Process requirements instead of being a separate section. In any case there is no reason why it should be very different from the previous one.

Commented [A41R40]: Reviewer comment: Agreed.



1.2.2 The CB shall specifically assess the capacity of the certificate holder's management system to manage any change in scope of the certificate, including any increase in the number of suppliers, and in the size, number or complexity of the SB within the scope of the certificate.

1.2.3 Documentation and records covering the period since the previous evaluation may be submitted to the CB for review, prior to a site visit.



Instruction Note 3C: CoC Surveillance – SBP requirements for CBs

Adapted from Reference Source: FSC-STD-20-011 V2-0 EN: *Chain of Custody Evaluations Part 1, Section 3, Surveillance Evaluations*.

1 General requirements

1.1 Surveillance audits shall follow clear, documented procedures, which address the elements specified in this Standard, and shall include in particular:

- a) Inspection and, if necessary, retention of relevant records of the certified and non-certified inputs used by the certificate holder
- b) Sampling of other relevant records
- c) Physical site inspection to verify the consistency and completeness of records and to ensure that an effective CoC system is in place.

1.2 The CB shall carry out a surveillance evaluation to monitor the certificate-holder's continued compliance with the applicable requirements of the relevant SBP certification standard(s) at least annually.

1.2.1 For a certificate that has a five-year duration, at least four surveillance evaluations shall take place before the certificate expires (unless clause 1.2.1 applies). However, a surveillance evaluation may not require a site level visit (see clause 1.2.2).

1.2.2 Surveillance evaluations may be waived for operations that have not produced, labelled or sold any biomass with an SBP-claim since the previous audit.

1.2.3 The CB has the authority to waive a surveillance evaluation on the grounds described above. The CB may still require a surveillance evaluation to be carried out, if this is considered necessary to ensure confidence in the certificate.

1.2.4 Under the circumstances described in 1.2.2, the CB shall require the certificate holder to sign a declaration stating that no biomass has been produced, labelled or sold with an SBP-claim since the last audit. The declaration shall contain a commitment by the certificate holder to contact the CB before commencing the production, labelling or sale of material with an SBP-claim. The declaration shall also contain a commitment to maintaining the certificate holder's CoC system during the period in question.

During the next surveillance evaluation, the CB shall review all records dating back to the previous on-site audit, to ensure that the CoC system has been maintained, and that no biomass has been produced, labelled or sold with an SBP-claim.

1.2.5 CBs shall not waive more than two consecutive surveillance evaluations.

1.3 Surveillance evaluations shall include:

- a) Evaluation of the certificate holder's implementation of all corrective action requests on which certification is based
- b) Review of any complaints, disputes or allegations of non-compliance regarding any applicable aspect of the relevant SBP certification standard(s)

Commented [A42]: Should be incorporated into section on Process requirements instead of being a separate section. In any case there is no reason why it should be very different from the previous two. These 3 instruction notes require streamlining

Commented [A43R42]: Reviewer comment: Agreed, significant potential to streamline this section. A key objective from the review process should be the identification and removal of any duplication of requirements.



- c) Evaluation of an adequate and appropriate sample of sites and records in order to verify that the management system (documented or undocumented) is working effectively and consistently, in the full range of conditions present in the entity under evaluation.
- 2 Review of documentation and records
- 2.1 The CB shall review at a minimum:
- 2.1.1 Any changes to the scope of the certificate, including new CoC procedures, operations and changes in activities.
 - 2.1.2 Changes to the certificate holder's management system.
 - 2.1.3 Inventory records.
 - 2.1.4 Purchasing and sales documentation for feedstock and biomass (invoices, bills, transport documents, sales contracts).
 - 2.1.5 Confirmation that inputs described as SBP-certified were covered by a valid SBP CoC certificate and supplied with the appropriate certification codes.
 - 2.1.6 a) Calculations of credits and/or input percentages for each product group within the scope of the certificate.
b) A sample of records of certified outputs, and confirmation that these can be traced to certified inputs.
 - 2.1.7 Use of the SBP trademarks (in transport and delivery documentation and promotional materials).
 - 2.1.8 Training records.
 - 2.1.9 Complaints received.
- 2.2 Records of complaints and resolution procedures shall be assessed by the CB during the evaluation.
- 3 Surveillance of the operational site
- 3.1 The auditor(s) shall visit the physical site(s) of each operation selected for evaluation in order to observe the applicable CoC system. This is to verify that there has been compliance with the requirements of the specific SBP certification standard(s) under evaluation at that site.
- 3.2 Desk audits may be carried out, without the need for on-site visits, for operations that do not take physical possession of SBP-certified materials or products in their own or rented facilities, and do not label, alter, store or re-package the products (e.g. sales offices or agents).



Instruction Note 3D: Non-compliance – SBP requirements for CBs

Adapted from Reference Source: *FSC-STD-20-011 V2-0 EN: Chain of Custody Evaluations, Part 1, Section 4, Certification Decision*.

1.1 CBs shall make certification decisions based on their evaluation of the operation's compliance with each applicable requirement, as specified in the relevant SBP certification standard(s).

1.2 All non-compliances with the applicable requirements of the relevant SBP certification standard(s) that are identified by the CB during main or surveillance audits shall be recorded in the evaluation report or associated checklists.

1.3 The CB shall identify and evaluate each non-compliance to determine whether it constitutes a minor or major non-compliance. Non-compliances shall result in corrective action requests, and, in some cases, suspension or withdrawal of the certificate.

1.4 The auditor may also identify emerging issues, which, if not addressed by the client, may lead to future non-compliances. Such issues shall be recorded in the main evaluation or surveillance audit report as 'observations' for the benefit of the client.

1.5 A non-compliance may be considered minor if:

- a) It is a temporary lapse OR
- b) It is unusual/non-systemic OR
- c) The impacts of the non-compliance are limited in their scale and duration AND
- d) It does not result in failure to meet the relevant requirement.

1.6 A non-compliance shall be considered major if, either alone or in combination with further non-compliances, it results in, or is likely to result in, a fundamental failure to meet the relevant requirement(s) for operation(s) within the scope of the evaluation.

Such failure shall be indicated by non-compliance(s) which:

- a) Continue over a long period of time, OR
- b) Are repeated or systematic, OR
- c) Affect a wide range of the production, OR
- d) Are not corrected or adequately addressed by the responsible managers, once they have been identified.

1.7 The CB shall consider the impact of a non-compliance on the integrity of the affected SBP-certified products and the credibility of the SBP trademarks, when evaluating whether a non-compliance results in, or is likely to result in, a fundamental failure to meet the relevant requirement.

1.8 The CB shall determine whether the impact of multiple minor non-compliances is sufficient to demonstrate 'systemic' failure (i.e. failure of management systems). In such situations, these minor non-compliances shall constitute a major non-compliance.

1.9 Corrective action requests shall adhere to the following timeframes:

- 1.9.1 Minor non-compliances shall be corrected within one year (under exceptional circumstances, within two years).

Commented [A44]: Should be incorporated into section on Process requirements instead of being a separate section. Actually I would say all this is redundant and can be eliminated.

Definitions of Non Conformities, Corrections, Corrective Actions etc should be the ISO definitions so no need to include them as scheme specific. There is no need for such widely used and accepted concepts to have a scheme specific definition.

Also these definitions were copied from the FSC ones which are not best practice

WG should consider if there is a need to keep the FSC based principle that 5 major NCs lead to suspension

The content that pertains to suspensions is unneeded but should be part of the process section too.

Commented [A45R44]: Reviewer comment: as far as I am aware FSC (and SBP) are the only scheme owners that apply the "5 NC" rule. As a method for setting a minimum acceptable threshold for the consequences of not demonstrating compliance the rule has never worked and, in fact ends up being counter-productive in the effective conduct of the audit.

Note: the rule has now been withdrawn from the FSC accreditation standard for CB compliance but inexplicably still applies to certificate holders.



1.9.2 Major non-compliance shall be corrected within three months (under exceptional circumstances, within six months).

1.9.3 Action(s) to correct a major non-compliance may take more than three months to complete, but sufficient action shall be taken within the specified period (i.e. three months, or six months in exceptional circumstances), to prevent new instances of non-compliance within the scope of the certification.

1.9.4 Corrective action request timelines commence from the moment when they are formally presented to the auditee and no later than three months from the audit closing date.

1.10 The CB shall determine whether the corrective action has been appropriately implemented within its timeframe. If the action taken is not considered adequate, then:

1.10.1 Minor non-compliances shall be re-categorised as major non-compliances, which shall be corrected within a maximum period of three months (or in exceptional circumstances, six months).

1.10.2 Major non-compliances shall lead to immediate suspension of the certificate.

1.10.3 Major non-compliances shall not be downgraded to minor non-compliances.

1.11 The occurrence of five or more major non-compliances in a surveillance audit shall be considered as a breakdown of the company's system and the certificate shall be suspended immediately.

1.12 The CB shall not issue or re-issue a certificate to a company if there is a major non-compliance with the requirements of the applicable SBP Standard(s).

1.12.1 Corrective action shall be taken by the company and approved by the Certification Body before a certificate is re-issued.

1.13 The CB shall issue a letter of notification to companies whose certificate has expired, or has been terminated, suspended or withdrawn. The notification letter shall include:

- a) A clear statement about the invalid status of the certificate (expired, suspended, withdrawn or terminated)
- b) The official date from which the certification becomes invalid
- c) The rationale for invalidating the certification which shall include, but is not limited to, an explanation for any breach of the certification contract and the nature of the relevant non-compliance with SBP certification standard(s) (including name, version number and date)
- d) In case of expired certification, or certification having been terminated voluntarily, a reference to the voluntary decision of the company or the agreement between the company and the CB
- e) A requirement to refrain from using any and all SBP trademarks.
- f) A statement requiring the company to provide acknowledgement in writing of receipt of the letter of notification, its acceptance of its conditions and that it understands the invalidation of its certification.

1.14 The CB shall keep records of all letters of notification sent to companies and the respective letters acknowledging receipt and understanding of the conditions.



Instruction Note 3E: Public Summary Reports – SBP requirements for CBs

Commented [A46]: Suggest this goes into the section on public information. I have not done that in this version of the document.

Adapted from Reference Source: *Forest management evaluations addendum – Forest certification public summary reports FSC-STD-20-007b (V1-0) EN*

1 General requirements

- 1.1 The CB shall prepare a public summary report for each BP to which a certificate is issued in accordance with the requirements specified in this standard.
- 1.2 If the main evaluation report meets the content requirements for the public summary report and the main evaluation report is publicly available in accordance with the requirements of this standard for language and public availability, then there is no requirement to prepare an additional, separate, public summary.

2 Public availability

- 2.1 The CB public summary report will be published on the SBP website.
- 2.2 Main evaluation reports, public summary reports and annual updates shall be submitted to the SBP no later than ninety (90) days after the on-site closing meeting at the end of a CB audit.

3 Content

- 3.1 The public summary report shall be concise, covering the most important features, and shall be completed using the latest versions of the public summary report template downloaded from the SBP website.

4 Updates

- 4.1 The CB shall provide SBP with an update of the public summary report within ninety (90) days after the last field day of each surveillance evaluation. Updates should be provided in the form of a revised report or additional pages, either published separately or added to the original public summary.
- 4.2 Updates shall include at least the following information:
 - a) The date of the surveillance evaluation and a brief summary of the sites inspected
 - b) A description of any significant changes in the SB, mitigation measures or risk ratings
 - c) A description of the actions taken by the certificate holder to correct any non-conformities identified at previous evaluations or subsequently
 - d) The CB's conclusions as to whether the actions taken constitute full conformity with the requirements of the relevant elements of the applicable SBP Standard and, if not, whether the remaining non-conformities is considered a 'minor' or 'major' non-conformity
 - e) Description of any further non-conformities identified as a results of the surveillance audit
 - f) Updated presentation of stakeholder comments and the results of the evaluation of those comments.
 - g) Statement of new conditions (namely, requirements to correct all identified non- conformities)
 - h) The updated certification decision.

Page 7: [1] Deleted

Author

Page 13: [2] Commented [A28R27]

Author

Reviewer comment: are we talking about the same thing here? Sampling as defined above refers to the determination of a sufficient sample of objective evidence to verify compliance, whereas is not this section referring to the methodology for selecting a sample of participating sites to verify in a multi-site audit (?).