

SBP Standards Development Process Launch: Q&As

General

1. What is wrong with the current standards?

Nothing is wrong with the current standards – they work well, remain robust and are recognised by stakeholders including the regulatory authorities in key geographies and markets. After five years it is good practice to review, revise and refresh.

2. How long will the process take?

It largely depends on the input of our stakeholders, and we need to take account of the uncertainties around COVID-19, but we are planning to have completed the process by the end of 2021.

3. Will the Instruction Documents also be revised, or will they be incorporated into the new respective standards?

We intend to use the Standards Development Process to incorporate the Instruction Documents that we have published to date, together with other documents, such as Guidance and Normative Interpretations, into the relevant standards. We also see this as an opportunity to improve the clarity and accessibility of the standards.

Participation and representation in the Standards Development Process

4. How do I join the Stakeholder Advisory Group?

Go to the 'Stakeholder Advisory Group' page on our website at: <https://sbp-cert.org/about-us/how-we-operate/governance-and-people/stakeholder-advisory-group/> and follow the prompts under: 'Join the Stakeholder Advisory Group'. Please note that the number of members of the Stakeholder Advisory Group is unlimited, although only one representative from each organisation/institution will be permitted.

5. How will the Stakeholder Advisory Group be involved in the Standards Development Process?

The Stakeholder Advisory Group (SADG) acts as a portal for interested stakeholders to provide feedback to SBP on any aspect of what we do. The SADG will have the opportunity to comment on the standards as they are developed. The responsibility for approving the standards rests with the Standards Committee.

6. Is it still possible to join the Working Groups?

Yes, please go to the 'Get Involved' page on our website at: <https://sbp-cert.org/standards-development/get-involved/> and complete the 'Contact Us' form.

7. How will Working Group members be chosen? Is there a limit on the number of people per Working Group?

Ultimately, Working Group members will be selected by the Chairs of each of the Working Groups. The Chairs will strive to ensure that Working Groups are balanced and

include participants with the relevant technical expertise to inform the discussions. The number of members will be informed by the level of interest as well, as practical limitations on group size.

With COVID-19 it is expected that many of the meetings will occur remotely and this should enable more participants to attend than would be possible with physical meetings.

8. For someone with an interest in forest carbon calculations, but with a background in certification and standard systems, would Working Group A or Working Group C be more appropriate?

It is possible to register your interest in joining more than one Working Group. If you have a specific area of interest then please let us know, by email to standardsdevelopment@sbp-cert.org if that is convenient, and we'll make sure that you can contribute in a way that is most constructive.

9. Are there limitations to participation in the Process? For example, is it possible to be a member of multiple groups, that is, Working Groups, Stakeholder Advisory Group, etc?

Anyone can register their interest in joining a Working Group, or indeed in engaging with us in any other way that would be convenient – we want to hear your views. It is possible to join multiple groups. Depending on the level of interest that we receive we may need to limit participants in some groups, although we hope that remote meetings will facilitate wider participation, but it will be possible to take part in Working Groups as observers and technical experts also.

10. How will SBP ensure that the Standards Development Process is not dominated by industry/commercial interests?

The Secretariat and Working Group Chairs will aim to ensure a range of interests, spanning civil society to commercial, are represented within the Working Groups themselves. We will also be engaging with stakeholder through specific activities, such as webinars and workshops, during the Standards Development Process.

11. If civil society does not express an interest in joining the Working Groups, what plans are there for engaging with that stakeholder group?

The Secretariat and the Working Group Chairs will work with the Stakeholder Advisory Group to identify means of ensuring representation of all stakeholders within the Standards Development Process. That may include supporting individuals in becoming members of the Working Groups, engaging with stakeholders on specific topics through existing working groups or on a one-to-one basis, as well as alternative methods of engagement, such as webinars and workshops, invitations to give evidence as a technical expert and participating in Working Group meetings as an observer.

Scope of the Standards Development Process

12. Given that the revision spans quite a long period of time (likely implementation of revised Standards 1 and 2 sometime in 2022), is there an intent for the revision scope to expand

to include new sustainability requirements that are currently under development (for example, REDII and any new EU Member State policies)?

Since the standards were published five years ago, we have had to respond to changing definitions of biomass sustainability, including those included in European Member State policies. We need to retain our responsiveness and flexibility to deal with these changes going forward.

We intend to incorporate changes that are occurring around us, be cognisant of likely future trends, and build those into the standards.

We have developed a great deal of competence in the practical application of sustainability definitions and how they can be credibly evaluated in practice. Our knowledge and experience could be very helpful to policy-makers developing biomass sustainability requirements and we intend to help inform policy-making and demonstrate that SBP provides an existing mechanism for delivering sustainable biomass to enable climate goals to be met.

13. Will SBP consider having a standard encompassing the developing world's small-scale producers/outgrowers residue, such as, cocoa residue, cashew shells, rice shells, end of life rubber wood etc?

SBP was established to focus on woody biomass for large-scale energy generation. As of today, most of our Biomass Producers are located in North America, Europe and Russia. As demand for sustainable biomass grows in other geographies, such as Japan, we will need to ensure that the standards can be applied to the geographic areas supplying those markets, including south east Asia.

The standard can already be applied to woody biomass from end of life rubber plantations, and we are exploring opportunities for SBP to enable the supply and use of other feedstocks, such as agricultural residues. Our focus, however, will remain on woody biomass.

Topics for discussion

14. Which topics are up for discussion?

All topics across all the standards are up for discussion, including the definition of biomass sustainability, how it is evaluated, the method and means of data collection and communication throughout the supply chain, and the requirements on the End-user. This is an opportunity to take a thorough look at the standards and make sure they are fit-for-purpose and focused on providing a certification system for biomass and enabling climate goals to be met. We are also open to comments on any aspect of what we do.

15. Is SBP going to take a firm line on forest carbon?

Forest carbon is already covered in our standards. However, we are aware that the understanding around the topic continues to develop and that there is wide divergence of views on how forest carbon should be evaluated in determining the sustainability of

biomass from forests. We want to hear your views on the topic so that we can ensure the next version of our standards provides a robust, credible and auditable way of determining that biomass is sustainable. We do expect a lot of discussion on the topic and welcome your input.

Recognition of other certification schemes

16. Will existing voluntary certification schemes approved by the European Commission under the original RED be reviewed to identify potential gaps in meeting RED II requirements, notably regarding carbon calculations and mass balance? Are you going to accept as equivalent all certification schemes recognised by the European Commission according to RED II?

We will review other voluntary certification schemes, including those recognised under the original RED (and if time permits those recognised under RED II), and evaluate how they match with delivering on our purpose.

Although we can't predict the outcome of that review it is unlikely that we will automatically recognise all schemes that are recognised under RED II as other schemes have different objectives from ours.

17. What would be the approach when it comes to reviewing/benchmarking other certification schemes? Is there a plan to engage with other schemes as well, for example, ISCC, RSB etc?

We will review other schemes in relation to how they align with our purpose and also where aspects of those schemes can complement what we do. We currently recognise feedstock supplied with FSC, PEFC and SFI claims and we require that all our Certificate Holders implement Chain of Custody systems from one of those schemes. We will further our engagement with other schemes as we seek to minimise duplication and divergence.

18. How will SBP ensure that work on concepts that have been, or are in the process of being, vetted under other standards, such as PEFC and FSC, is not duplicated?

We are very aware that we do not operate in isolation, but rather within a framework of related standards and schemes. We look to ensure consistency between SBP and those other standards and to use concepts developed in other schemes where they support our work. We will review how we link with, and avoid duplication with, other standards as part of the Standards Development work.

Implementation

19. With three Working Groups and many standards being developed simultaneously, do you anticipate that some standards will be implemented while others are still in-progress? How would this work for integrated companies who may have to implement several standards?

It is possible that some standards will be published while others are still being drafted. We will, however, consider the status and draft content of all standards before we publish any to ensure there are no conflicts.

Many other schemes publish revised versions of some of their standards, whilst other standards remain unchanged. Being able to revise all our standards provides a great opportunity to ensure consistency and integration of the requirements at the same time.

Approval under RED II

20. Are you aiming to get SBP approved by the EU Commission under RED II? If yes, when do you think you will get the approval?

Yes, we do expect to be a recognised scheme under RED II. The process for applying for approval is not yet open and the dates for that are not yet confirmed. We will apply once the process is open.

21. Great that you are seeking RED II approval. Will this also cover Annex 9a feedstocks and not just biomass for power sector?

At the moment we will continue to focus on serving woody biomass for large-scale heat and power production.

Other

22. Does SBP intend to cater for different end market requirements within the core standards or, for example, through 'bolt-ons'?

Our definition of biomass sustainability is described in Standard 1, and the aspects of Chain of Custody, data collection and communication and the way that is certified by third parties is common across all certificates.

For some markets, we have had to develop specific additional requirements that need to be met to service those markets. For example, Instruction Document 2D: SBP Requirements for Group Schemes was developed to meet the specific requirements of the Netherlands.

23. Could you explain the SBP work to date with ISEAL and how/if this work will be incorporated into the standards revision?

SBP intends to become a full member of ISEAL and we are working towards that. We have already established our governance and standard-setting processes in line with ISEAL requirements. Additionally, we are developing our Assurance, and Monitoring and Evaluation processes to ensure we can demonstrate compliance with the ISEAL requirements when we apply for membership.

24. Is there any standard procedure available describing the rules for recognition of certification bodies together with a fee schedule included?

The current requirements for Certification Bodies are set out in Standard 3, see: <https://sbp-cert.org/documents/standards-documents/standards/>. The application process for Certification Bodies is managed by Assurance Services International in line with their procedures, which are available from their website: <https://www.asi-assurance.org/s/>.