

Public consultation of SBP Standards 3 to 6 Revision Draft v1:

Explanatory note

1 Objectives of the public consultation

This first public consultation provides a formal opportunity for stakeholders to provide feedback on the Revision Drafts v1 of Standards 3, 4, 5 and 6, including whether stakeholders consider that the Revision Drafts meet the Standards Development Process Terms of Reference.

Following the consultation, the SBP Secretariat will collate and analyse comments to enable Working Groups, who are tasked with developing the Standards, to consider how best to incorporate the comments in the development of the final draft of the Standards. SBP will also publish a Response to Consultation setting out the comments received and actions taken.

2 The Standards Development Process

The Revision Draft v1 Standards presented here are an interim output of the Standards Development Process that was launched in May 2020 and is expected to run to Q4 2021. Besides aiming to align with Best Practice for Certification Schemes, this Process is part of our continual improvement, requiring us to regularly review our Standards to ensure they remain fit for purpose.

The Standards Development Process follows the Terms of References published in May 2020 and sets out how we achieve transparency, enable stakeholder consultation and sets out clear decision-making structures. This public consultation is an important part of these elements and will be followed by further stakeholder engagement and a second public consultation in Q3 2021.

The Standards Development Process has involved dividing the drafting between three Working Groups. Representation on all the Working Groups was drawn from SBP Certificate Holders and other stakeholder groups, and has been led by independent Working Group Chairs supported by the SBP Secretariat.

The Working Groups established task-specific Sub-groups, where specific technical topics were discussed for the purpose of providing proposals to the Working Groups. The Working Groups then considered the output of the Sub-groups and agreed upon whether and how to integrate them in Revision Draft v1. Working Groups further authorised the Secretariat to draft the working documents with the revised content. Revision Draft v1 of the Standards, which are now under public consultation, are the results of this process so far.

The Revision Draft v1 of the Standards reflects the results of several months of online meetings, supported by SBP internal and external experts and a series of workshops which further broadened the input into the Process. The Working Groups met monthly, in plenary online sessions. For the most part the 17 Sub-groups met bi-weekly.

Throughout the Standards Development Process there was close liaison with both the SBP Standards Committee and Technical Committee. The Working Group Chairs regularly attended Committee meetings to provide update reports and receive feedback from Committee Members, and the Co-Chairs of the Standards Committee also attended Board meetings to provide updates. Additionally, the Standards and Technical Committees had the opportunity to review and provide feedback on all four of the Revision Draft v1 Standards prior to the public consultation.

3 Scope of the Standards

The four Revision Draft v1 Standards 3, 4, 5 and 6, which are the subject of this public consultation are a part of the full suite of six SBP Standards. These four Revision Draft v1 Standards set out the requirements for:

- Independent Certification Bodies to ensure credible and consistent application of the SBP requirements; (Standard 3)
- Maintaining the Chain of Custody for biomass through the supply chain; (Standard 4)
- Data collection and communication; (Standard 5) and
- Certification of the energy and carbon balance calculation (Standard 6).

Standards 1 and 2 are not included in this public consultation and Revision Drafts are currently being developed. Standard 1 covers feedstock sustainability requirements, including forest carbon and biodiversity. Standard 2 sets out how to evaluate compliance with the requirements in Standard 1. These two Standards provide an effective and verifiable process for Biomass Producers to assure End-users that feedstock is legally and sustainably sourced. The process applies a risk-based regional approach combined with the application of mitigation measures by Biomass Producers to address any identified risks. Public consultation of Revision Draft v1 of Standards 1 and 2 will start in early June 2021.

4 Standard-specific considerations

4.1 Standard 3: Certification Body Requirements

The key decision that had to be made in relation to Standard 3 was which baseline accreditation standard to follow in relation to Certification Body approval. The original intention was to opt for alignment with ISO 17021:2015 “Conformity assessment — Requirements for bodies providing audit and certification of management systems”. ISO 17021, an up-to-date standard with its focus on management systems, was considered to be more closely aligned with the SBP certification system. However, during the Standards Development Process it became clear that this could be problematic in certain jurisdictions, such as the Flanders region of Belgium, where local regulation requires accreditation to ISO 17065:2012 “Conformity assessment — Requirements for bodies certifying products, processes and services” as a pre-requisite. For that reason, and other practical reasons, the decision has been taken to remain with ISO 17065 as the baseline standard and incorporate certain elements of ISO 17021, such as competence of personnel, where they add value to the SBP certification system.

This Standard also incorporates additional SBP-specific requirements, which are currently found in SBP Instruction Documents and Interpretations.

4.2 Standard 4: Chain of Custody

The key decision in relation to Standard 4 was whether to create a standalone SBP Chain of Custody Standard or to maintain the previous arrangement, or an adaptation thereof, whereby implementation of the FSC, PEFC or SFI Chain of Custody requirements formed the basis for SBP Chain of Custody. Ultimately, the decision was taken that Standard 4 should be a standalone SBP Chain of Custody Standard. It is still the intention to allow Standard 4 to work alongside FSC, PEFC and SFI Chain of Custody standards and any Chain of Custody systems that are identified as relevant in the future. To this end a benchmarking and endorsement system will be developed by SBP. It is likely that this benchmarking work will take place throughout the summer of 2021, between the first and second rounds of public consultation as the content of the Standards approaches finalisation.

Additionally, developing a Chain of Custody Standard which is not dependent on the approval of other schemes under the Renewable Energy Directive II (REDII) provides additional security to the SBP system.

4.3 Standards 5 and 6: Data collection and communication and energy and carbon balance calculation

Discussions are ongoing as part of the Standards Development Process, but the current consensus is that in order to demonstrate the positive impact of the use of biomass for heat and/or power production, aggregated data on the carbon intensity of the delivered product and the achieved GHG savings over the supply chain should be published; this would include End-users in the reporting requirements. The exact detail on the aggregated data to be published is still under discussion.

Similarly, whilst discussions are ongoing there is currently a consensus in the relevant Working Group to align requirements for a GHG saving threshold and calculation methodology to national/regional legislative requirements where appropriate. Where national/regional legislative thresholds and calculation methodologies are not prescribed, an Instruction Document related to Standard 6 will describe the detailed methodology and requirements relating to demonstrating GHG savings achieved through the use of biomass for heat and/or power production, based on REDII. This Instruction Document is under development and not included in this consultation; as part of the ongoing discussions, consideration will be given to whether or not such content should be in an Instruction Document or in the Standard itself.

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