



Standards Development Process

SBP Standard 4: Chain of Custody

Revision Draft Version 1 for Public Consultation

(for status see document history on page ii)

Sustainable Biomass Program
sbp-cert.org

Revision Draft Version 1 for Public Consultation

Date: 31.03.2021

Formal status of document: Consultation Document

Document history

(see Standards Development Process Terms of Reference v1, page 29)

SEC editing team working document	
Working Group B working document	
Agreed by Working Group B	
Technical Committee review document	
Technical Committee reviewed	
Standards Committee review document	
Standards Committee reviewed	
Working Group B working document for public consultation approval	
Approved by Working Group C as Revision Draft v1 for public consultation	X

Contents

1	Organisational requirements	Fehler! Textmarke nicht definiert.	
1.1	Management system and review		8
1.2	Documented procedures		9
1.3	Training and qualifications		10
1.4	Internal audits		10
1.5	Record keeping		11
1.6	Stakeholder engagement		11
1.7	Non-conforming product or document		13
2	Feedstock Sourcing Requirements		14
3	Traceability Requirements		14
3.1	Input / purchasing		14
3.2	Material accounting		15
3.3	Output/sales		17
3.4	Claims		17
4	Additional requirements		18
4.1	Business integrity, social, health and safety and environmental requirements for all Certificate Holders		18
4.2	Subcontracting activities/Sub-contractors		19
4.3	Collection and communication of data for energy and carbon balance calculations	Fehler!	
	Textmarke nicht definiert.		

A. Summary of changes

This is a first draft of an SBP standalone Chain of Custody (CoC) Standard, which is intended to apply consistently across all SBP Certificate Holders, and to meet REDII requirements.

The SBP certification scheme was, and is intended to continue to be, based on and complementary with the leading forest certification schemes: FSC and PEFC and SFI. There are many benefits, however, for SBP and the biomass industry to have a CoC standard designed specifically for sustainable biomass.

FSC and PEFC were not designed for biomass production and trade, and do not themselves address all industry-specific needs and regulations (e.g. mixing in shipping, DBSD inventory management, no CW for final product). FSC and PEFC standards are lengthy because they cover the whole range of wood and paper products, industries and processes. They are also regularly in flux. Keeping up with new requirements and interpretations, that may or may not be relevant for sustainable biomass, can require significant resources at times. FSC and PEFC are their own organisations with their own goals and intentions; their interpretations of how to comply with EUTR or other regulations may vary with one another and with those of SBP.

Having an SBP-specific CoC Standard provides the organisation with full control over the requirements to be met by SBP Certificate Holders.

Note that additional requirements, and/or adaptations, will likely have to be integrated in the Standard in order to ensure conformity with REDII requirements. This affects in particular section 3.2. Also, EUTR-related aspects still must be considered, making clear that every Certificate Holder needs to follow EUTR, where applicable.

B. Introduction

The Sustainable Biomass Program (SBP) is a certification system designed for woody biomass, mostly in the form of wood pellets and woodchips, used in industrial, large-scale energy production.

SBP's certification system provides assurance that woody biomass is sourced from legal and sustainable sources, and a means to collect and communicate sourcing and greenhouse gas (GHG) data along the supply chain, allowing companies in the biomass sector to demonstrate compliance with regulatory requirements.

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

C. Objective

The objective of this Standard is to ensure robust management and CoC systems are in place to ensure the integrity and accuracy of SBP claims.

D. Scope

This document (SBP Standard 4: Chain of Custody) sets out the requirements that, if successfully implemented, allow organisations to make claims related to compliance with the SBP requirements. It outlines requirements that are central to all SBP applicants and Certificate Holders, including organisational requirements, feedstock sourcing and traceability requirements, and also includes business integrity, social, and health and safety requirements.

The starting point for the SBP CoC Standard is the forest Supply Base (SB). This Standard covers the CoC requirements, following receipt of feedstock by the Biomass Producer (BP). The BP and components of the downstream supply chain, including trade, transport and processing, require CoC certification if those organisations or their customers take legal ownership of the product and wish to make SBP claims about their products.

Parties that are not SBP CoC-certified cannot sell SBP-certified products. Service providers which are part of the SBP supply chain but do not take legal ownership of the biomass (e.g., transport companies, storage platforms) may choose whether or not they wish to be CoC-certified.

For biomass to carry an SBP claim, there cannot have been any physical mixing with feedstock or biomass which is not either SBP-compliant or SBP-controlled.

This Standard is applicable to all sites, including where several sites are centrally owned and managed.

E. How to use this document

This Standard is applicable for every SBP applicant/Certificate Holder.

Standard 1 (principle and criteria for feedstock) and Standard 2 (verification of feedstock) are applicable for Biomass Producers, which are the first organisation in the supply chain sourcing feedstock without an SBP claim.

Certification against Standard 5: Energy Carbon Balance Calculation, is required for all organisations that take legal ownership of SBP-certified biomass and that wish to sell the product as SBP-certified with certified energy and carbon and profiling data.

Note: [Instruction Documents](#) and [Interpretations](#) posted on the SBP website shall be used in conjunction with this Standard, as applicable.

F. Normative references (related to this document)

SBP Standard 1: Feedstock Compliance

SBP Standard 2: Verification of SBP compliant feedstock

SBP Standard 3: Requirements for Certification Bodies

SBP Standard 5: Collection and Communication of Data

SBP Standard 6: Energy and Carbon Balance Calculation

SBP Glossary of Terms and Definitions

Glossary of Terms and Definitions

[These are here as a placeholder. They are either new or were previously embedded in the Standard. They will ultimately be included in the SBP Glossary and this section of the Standard removed.]

Affected stakeholder: Any person, group of persons or entity that is or is likely to be subject to the effects of the activities of a Management Unit. Examples include ,but are not restricted to (for example in the case of downstream landowners), persons, groups of persons or entities located in the neighbourhood of the management unit. The following are examples of affected stakeholders: local communities, indigenous peoples, workers, neighbours, downstream landowners, local processors, local businesses, tenure and use rights holders, including landowners, regional organisations authorised or known to act on behalf of affected stakeholders, for example, social and environmental NGOs, labour unions, etc.

Indirectly-affected stakeholder: Stakeholders that may have knowledge of or views about an organisation. Organisations will have many stakeholders, each with distinct types and levels of involvement, and often with diverse and sometimes conflicting interests and concerns.

Subcontractor: an individual or legal entity, independent from the applicant/Certificate Holder, to whom activities pertaining to certification are contracted, be it temporarily, intermittently, regularly or continually.

SBP-compliant biomass is biomass that is produced in compliance with all relevant SBP Standards and is derived from SBP-compliant primary feedstock. It may physically contain SBP-compliant feedstock and SBP-controlled feedstock..

SBP-controlled biomass is biomass which is produced in compliance with all relevant SBP Standards and is derived from controlled feedstock. It may physically contain SBP-compliant feedstock, and Controlled Feedstock.

Stakeholder: A person, group, or organisation with an interest in a company's production and sourcing activities, the ability to influence the outcomes of these activities, and/or the potential of being impacted by these activities.

Stakeholder engagement: Stakeholder engagement is the process used by an organisation to engage relevant stakeholders for a clear purpose to achieve agreed outcomes. It is now also recognised as a fundamental accountability mechanism, since it obliges an organisation to involve stakeholders in identifying, understanding and responding to sustainability issues and concerns, and to report, explain and answer to stakeholders for decisions, actions and performance.

Stakeholder Engagement Plan (SEP): A detailed procedure that outlines how, when and where (physical or platform) relevant stakeholders will be identified and contacted, what information will be shared with them, and how comments/feedback will be received, reviewed and responded to.

The intention of stakeholder engagement is to demonstrate a commitment to being open, transparent and responsible with regards to conformance with SBP requirements. This means notifying stakeholders of the timing of relevant activities and providing them with appropriate and accessible (easy to find and in relevant language) information so they can provide meaningful and relevant comments/feedback, particularly at opportune times when those comments can be helpful for an assessment of conformance.

Stakeholder Engagement Plans can help a company identify the most critical opportunities for collaboration and risk mitigation to address broader challenges in fulfilling their commitments in each context.

Stakeholder map: A list or database or other organisation of all known directly and indirectly affected stakeholders including, at minimum, their name (individual or organisation), current contact information, geographical location or scope (for organisations), as well as any other information that is relevant for effectively engaging with those stakeholders (e.g., interest/expertise, etc.).

Stakeholders may include, among others, indigenous peoples, local communities, or smallholders affected by deforestation, conversion, and human rights impacts; civil society actors; other companies operating in the same sector or jurisdiction; suppliers and purchasers along the supply chains of which the companies are a part; and governments in the jurisdictions where the subject commodities are produced.

Legend

Colour Coding	Identified change between current Standard 4 and Revision Draft v1
	No change
	Text moved within the same document
	Text moved to another SBP document
	Text removed
	Re-worded/updated text without change to meaning
	Text revised with meaning of text changed
	New text added from another SBP document
	New text added from elsewhere without modification
	New original text or added from elsewhere with modification

Unless otherwise noted, the changes from the source text were not changes to the meaning, only to the structure and language for consistency with other SBP Standards.

'Generic' means that it is a common requirement and is not attributed to a single referenced Standard

Colour coding	Source	Standard 4 Revision Draft 1.0	Notes / Questions
		1 Organisational requirements	
		1.1 General requirements	
	ISO 22095, 6.3	1.1.1 There is demonstrated and documented support from senior management of the organisation for maintaining certification and meeting all applicable requirements. The commitment of the organisation shall be made available to	

		its personnel, suppliers, customers and other stakeholders.	
	RSB-STD-11-001-20-001 ver.3.6 RSP EU RED Standard for Traceability (Chain of Custody), 1.5	1.1.2 The organisation shall have all necessary infrastructure and operating procedures in place to effectively operate the chain of custody system and ensure that feedstock/biomass can be tracked continuously without interruption through all internal processing steps from acquisition to transfer of material (or release for sale).	
	generic	1.1.3 The organisation shall assign responsible persons as appropriate for specific components of the certification scope, with required qualifications (competences, knowledge and experience) and/or training and sufficient resources to be effective.	
	RSB-STD-11-001-20-001 ver.3.6 RSP EU RED Standard for Traceability (Chain of Custody), 1.6	1.1.4 The organisation shall document all sites/facilities where feedstock/biomass is acquired, handled and forwarded and where internal process steps occur.	
		1.2 Documented procedures	
	generic	1.2.1 The organisation shall maintain documented procedures (i.e. work instructions or equivalent documentation), covering all relevant requirements and reflecting current organisational activities. Documented procedures should be reviewed at least annually for completeness and effectiveness.	
	generic	1.2.2 Documented procedures should include: <ul style="list-style-type: none"> • Training (1.3); • Internal audits (1.4); • Record-keeping (1.5); • Stakeholder engagement, including management of comments and complaints (1.6); • Non-conforming product/document (Fehler! Verweisquelle konnte nicht gefunden werden.); • Material receipt: Input/purchasing (3.1); • Material accounting (3.2); • Sales transactions: Output/sales (3.3); and 	

		<ul style="list-style-type: none"> • Claims (3.4). <p>And where applicable:</p> <ul style="list-style-type: none"> • Business integrity, social, and health and safety requirements in (4.1); • Subcontracting activities/Sub-contractors (4.2); • Collection and communication of data for energy and carbon balance calculations (Fehler! Verweisquelle konnte nicht gefunden werden.Fehler! Verweisquelle konnte nicht gefunden werden.); • Electing and appointing a qualified SBE evaluation team (Standard 2, tbd); and • Monitoring the effectiveness of Mitigation Measures (Standard 2, tbd). 	
		1.3 Training and qualifications	
	RSP0-STD-T05-001 V2, 5.8.1	1.3.1 The organisation shall have a training plan which is reviewed at least annually to ensure its effectiveness.	
	RSP0-STD-T05-001 V2, 5.8.2	1.3.2 The organisation shall provide appropriate training for personnel carrying out tasks critical to the effective implementation of applicable requirements. Training shall be specific and relevant to the task(s) performed.	
	RSP0-STD-T05-001 V2, 5.8.3	1.3.3 Records of training participants and content shall be maintained.	
		1.4 Internal audits	
	generic	<p>1.4.1 The organisation shall conduct an annual internal audit for the purpose of evaluating the organisation's conformance with SBP requirements.</p> <p>NOTE: The extent of the internal audit may be dependent on the size and scope of the organisation and certificate, and the results from previous internal and external audits.</p>	
	generic	<p>1.4.2 The organisation shall ensure that:</p> <ol style="list-style-type: none"> Internal audits are conducted by personnel knowledgeable in the requirements of this Standard; Internal auditors do not audit their own work; and Any non-conformities found during internal audit shall be recorded as corrective actions, and actions shall be taken in a timely and appropriate 	

		manner.	
		1.5 Record keeping	
	generic	<p>1.5.1 The organisation shall maintain accurate, complete, up to date and accessible records and reports covering all applicable SBP requirements, including at least the following:</p> <ul style="list-style-type: none"> • Training records (1.3.3); • Subcontractors (4.2.6); • Suppliers (2.1.1); • Purchases (see 3.1); • Determination of conversion rates (3.2.4Fehler! Verweisquelle konnte nicht gefunden werden.) • Sales (see 3.3); • Material accounting (3.2); • Stakeholder comments, feedback and complaints (1.6); • Implementation of non-conforming product/document procedure (Fehler! Verweisquelle konnte nicht gefunden werden.); and • Standard 5 records [tbd] <p>And where applicable:</p> <ul style="list-style-type: none"> • Competences required for the SBE evaluation team and evidence of the team's qualifications; and • Mitigation Measures: documentation, justification, and records of implementation. <p>Note: the SBP DTS can be referenced for available records where applicable.</p>	
		1.5.2 Records shall be retained for a minimum of five (5) years and comply with legal and regulatory requirements and be able to confirm the status of all in-stock inputs and products.	
	Based on AccountAbility: AA1000 Stakeholder	1.6 Stakeholder engagement	Background information for public consultation:

	Engagement Standard 2015		Proposal from the Stakeholder Engagement sub-group that SBP develop a database to collect stakeholder comments to make them available for all parties: CHs, CBs, SBP, ASI and other stakeholders. The intention is to avoid stakeholder fatigue which occurs in part when certain stakeholders are repeatedly requested to provide comments or feedback for different CHs in, or sourcing from, the same region.
	Stakeholder Engagement Sub-group	1.6.1 The organisation shall develop, implement, monitor and evaluate a Stakeholder Engagement Plan (SEP) appropriate for their business operations and scope of certification. [See SBP Guidance on Stakeholder Engagement]	SBP Guidance on Stakeholder Engagement to be developed
	Stakeholder Engagement Sub-group	1.6.2 The scope of the SEP shall define: <ul style="list-style-type: none"> • The subject matter the engagement will address; • The parts of the organisation (e.g. regions, divisions, etc.) and associated activities, products and services the engagement will address; • The timing and/or periodicity of the engagement (e.g. meetings, reports, trainings, etc.); • The methodologies, practices and activities used for stakeholder engagement; 	

		<ul style="list-style-type: none"> • How monitoring and evaluation of the SEP will be carried out; and • How records of engagement are maintained. 	
	Stakeholder Engagement Sub-group	1.6.3 The implementation and documentation of a transparent grievance/ complaints mechanism shall be part of the SEP.	Detailed requirements for grievance / complaints mechanism to be developed
	Stakeholder Engagement Sub-group	1.6.4 Evidence of effective implementation of the SEP shall be available for verification, such as meeting notes, email communications, records of participation in regional multi-stakeholder processes, responses to comments/feedback/complaints, etc.	
	Stakeholder Engagement Sub-group	1.6.5 The organisation shall review the SBP stakeholder database, address any relevant comments at least annually, and use the information provided by SBP (database/Regional Risk Assessment) to inform their SEP.	
	Stakeholder Engagement Sub-group	1.6.6 The SEP shall be re-evaluated at least every five (5) years to ensure its effectiveness.	
	Stakeholder Engagement Sub-group	1.6.7 The SEP shall be publicly available (on the BP/Certificate Holder website) in a language(s) that is/are accessible for at least the identified affected stakeholders.	
		1.7 Non-conforming product or document	
	RSPO-STD-T05-001 V2, 5.4.4	1.7.1 The organisation shall have documented procedures for identifying and appropriately responding to non-conforming products and/or documents and shall implement it as necessary.	
	FSC-STD-40-004 V3-0, 1.6	1.7.2 Where non-conforming products/documents are detected after they have been delivered, the organisation shall undertake the following activities: <ul style="list-style-type: none"> a. notify its certification body and all affected direct customers in writing within five business days of the non-conforming product identification, and maintain records of that notice; b. analyse causes for occurrence of non-conforming products, and implement measures to prevent their reoccurrence; 	

		c. cooperate with its certification body in order to allow the certification body to confirm that appropriate actions were taken to correct the non-conformity.	
		2 Feedstock Sourcing Requirements	
	generic	2.1.1 The organisation shall maintain up-to-date information about all suppliers who are supplying materials used for SBP product groups, including names, certification code (if applicable), and materials supplied.	Records are in the DTS but not before the BP
		2.1.2 Feedstock supplied with an SBP-compliant or SBP-controlled claim shall be categorised as such.	
	Based on SBP Std 2	2.1.3 Primary and secondary feedstock supplied without an SBP claim shall be verified following SBP Standard 2 against SBP Standard 1 requirements.	Consultation question: How should SBP consider tertiary feedstock?
		3 Traceability Requirements	
		3.1 Input / purchasing	
	generic	The SBP certified organisation is responsible for ensuring that all transactions of material included in its SBP product group schedule can be traced at least one step upstream and one step downstream from itself, and that all material is accounted for whilst under its legal ownership.	Intent statement for traceability. These may be included throughout all SBP Standards to assist with interpretation of requirements.
	generic	3.1.1 The organisation shall ensure that the following minimum information is provided by the supplier in relation to the product received: a) A unique identification number for the document; b) Date the document(s) is(are) issued; c) Name and address of the buyer; d) Name and address of the seller; e) CoC certificate number of the seller, if relevant;	

		<ul style="list-style-type: none"> f) Loading or shipment delivery date; g) Description of product; h) Quantity of product delivered; and i) Reference to any related transport documentation. 	
	generic	3.1.2 The organisation shall be responsible for verifying conformance of feedstock with all relevant SBP requirements.	
	RSPO-STD_T05_001 V2, 5.4.3	3.1.3 The site receiving certified feedstock for input to SBP product group(s) shall ensure that the certified claim is verified as certified and purchased directly from the certified supplier by checking the relevant certification scheme database.	
	SBP	3.1.4 When receiving biomass with an SBP claim the organisation shall ensure that any documentation exchanged between itself and the seller includes a unique identification number which enables the delivery to be linked to the DTS.	
		3.2 Material accounting	Note on section 3.2: Requirements might need further adaptation due to pending clarifications on REDII-requirements
	generic	3.2.1 The organisation shall ensure that the quantity of physical inputs and outputs are monitored and documented.	
	SBP Std 4, 5.2.4	3.2.2 When feedstock or biomass is received with a SBP-approved CoC System partial claim (e.g. a % claim) the organisation shall calculate the proportion (quantity) of the feedstock or biomass that is SBP-compliant feedstock, and the corresponding proportion that is SBP-controlled feedstock.	
	generic	3.2.3 If an organisation is not physically segregating biomass from different CoC systems, the organisation shall demonstrate that there is no double-accounting of physical volumes.	
	generic	3.2.4 The organisation shall have a consistent methodology for calculating conversion factors and shall keep it up to date. The conversion factor shall be based on the actual output of a specific product.	

	generic	3.2.5	For organisations opting to use a physical separation material accounting methodology, feedstock with varying sustainability and/or energy data shall be kept physically separate and identifiable.	
	RSB-STD-11-001-20-001 ver 3.6 RSB EU RED Standard for Traceability (Chain of Custody), 3.4.1	3.2.6	For organisations opting to use a Mass Balance material account methodology, the organisation shall set up and maintain a Mass Balance account to which additions and deductions of credit for a single site shall be recorded. NOTE: Organisations who want to make REDII-compliant claims on SBP-compliant biomass shall use a mass balance system.	
	generic	3.2.7	The organisation shall ensure for each site that the quantity of biomass sold with claims does not exceed the quantity of biomass received that qualifies for said claims, within the defined inventory balancing/claim period.	
	generic	3.2.7.1	Organisations may group various products that share similar characteristics in terms of product type, quality and production process into product groups.	
		3.2.7.2	The organisation shall either define a fixed balancing period of not more than 3 months or operate a continuously balanced account.	Consultation question: For organisations not intending to meet REDII requirements, should there be different credit accounting requirements than 3.2.7.5?
	RSB-STD-11-001-20-001 ver 3.6 RSB EU RED Standard for Traceability (Chain of Custody), 3.4.12	3.2.7.3	A positive balance may be carried over in the account (into the next fixed balancing period) up to the total corresponding amount of physical material that is in stock at the end of the previous balancing period.	
		3.2.7.4	The organisation shall make available to auditors all mass balance data in advance of the planned audit.	
		REDII-specific requirements		

	REDII	3.2.7.5 The organisation shall define a <u>fixed balancing period</u> of not more than 12 months. Account may be overdrawn if a balancing period is not more than 3 months. By the end of the balancing period, the account shall always be positive. If negative credits occur at the end of a mass balance period, the certified company must inform the certification body immediately and without being requested.	
	REDII	3.2.7.6 When registering a REDII-compliant biomass transaction in DTS an organisation must add following additional sustainability characteristics data: <ul style="list-style-type: none"> • Market Specific Status: REDII-compliant • Country of origin of the feedstock • Feedstock is sourced using Supply Base Evaluation: Yes/No/N/A • Feedstock belongs to secondary or tertiary category: Yes/No/N/A 	
		3.3 Output/sales	
	Based on SBP Guidance document for Certificate Holders	3.3.1 The organisation shall register each transaction in the SBP DTS. <i>See SBP Guidance document Data Transfer System 2.0 user guide for Certificate Holders.</i>	
	Based on SBP Guidance document Data Transfer System 2.0 user guide for certificate holders	3.3.2 The supplying site of the organisation shall ensure that any documentation exchanged between itself and its customer includes a unique identification number which enables the delivery to be linked to the DTS.	
	SBP Std 4, 5.5.6	3.3.3 The organisation may supply any or all of the following: SBP-compliant biomass, SBP-controlled biomass, and/or other biomass. Other biomass shall be physically separated and shall not be mixed will SBP-compliant or SBP-controlled biomass.	
		3.4 Claims	
	SBP Std 4, 5.5.2	There are two SBP claims: <ul style="list-style-type: none"> • SBP-compliant biomass; and • SBP-controlled biomass. 	

	SBP Std 4, IN4B, 2.2	3.4.1 The claims 'SBP-compliant biomass' and 'SBP-controlled biomass' may be used on documents related to biomass, such as sales documentation, invoices and delivery documentation, only where it refers to products which are included in the organisation's certified product group schedule and that meet the eligibility requirements for SBP claims. See also Instruction Note 4B: Trademark Use	
		4 Additional requirements	
	SBP Std 4, 6.3	4.1 Business integrity, social, health and safety and environmental requirements for all certificated organisations	
		NOTE: Level of effort required for conformance with Section 4 must be proportionate to the nature and the scale of the organisation.	
	SBP Std 4, 6.3.1		The legal owner shall implement the requirements of either: PEFC 2002:2013 Section 9: Social, Health and Safety requirements in CoC, Or FSC-STD-40-004 V2-1-EN Section 1.6: Occupational Health and Safety Or the latest versions of these documents.
	SBP Std 4, 6.3.2	4.1.1 The organisation shall determine and implement effective arrangements against corruption proportionate to the nature and the scale of organisation.	
	SBP Std 4, 6.3.3	4.1.2 The organisation shall determine and implement effective arrangements to	

		comply with all applicable laws, rules and regulations in countries where it conducts business activities.	
		<p>4.1.3 Sub-group 10: Social is drafting general risk-based, impact indicators for all SBP Certificate Holders and their sub-contractors, for H&S and ILO core requirements. The sub-group recommends focusing on high-risk jurisdictions and activities and limiting burden on low risk highly regulated jurisdictions.</p> <p>Issues which should be addressed include:</p> <ul style="list-style-type: none"> • Landscape/visual impacts/access/recreation/peace/wilderness • Labour rights, including avoiding modern slavery • FPIC • Poverty alleviation • Food security • Equality 	
		4.2 Sub-contractors	May be changed back to outsourcers as that is the ISO term used in 17065 (applicable for SBP Standard 3).
	generic	In cases where an operation subcontracts activities to independent third parties, hereafter referred to as 'subcontractors', the operation shall ensure that they comply with relevant requirements of the SBP Standards.	
	generic	4.2.1 Subcontracting shall be included in the scope of the certificate.	
	generic	4.2.2 The organisation shall retain legal ownership of material while in physical possession/under control of subcontractors.	
	RSPO STD T05-001 V2, 5.5.4	4.2.3 The organisation shall notify the CB before engaging new subcontractors.	
	generic	4.2.4 A signed and enforceable agreement shall exist between organisation and subcontractors requiring access of CB to subcontractor operations, systems, documents and records as deemed necessary by CB.	

	generic	4.2.5 The organisation and/or subcontractor shall have documented procedures for all outsourced activities.	
	generic	4.2.6 Record of names and contact details of subcontractors with scope of activities shall be maintained and kept up-to-date by the organisation.	

Instruction Note 4A: SBP tertiary feedstock requirements

[The Feedstock sub-group is discussing definitions of reclaimed input.]

Instruction Note 4B: Trademark use

[No major changes expected to trademark requirements. May be moved out of an Instruction Note.]