



Standards Development Process

Response to public consultation of SBP Standards Revision Draft v1

Sustainable Biomass Program
sbp-cert.org

Response from the Standards Development Working Groups to first public consultation of SBP Standards Revision Draft v1

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Response to public consultation on SBP Standards Revision Draft v1

NOTE

This document provides the preliminary response from the Standards Development Working Groups to the contributions received from the first public consultation. On finalisation of the Final Draft of the revised Standards, SBP will provide a comprehensive response to the contributions received from the two public consultations (of Revision Draft v1 and v2).

Standard 1 Revision Draft v1: Contributions and Responses

S1	Comment	Response
<p>S1</p> <p>Background and Scope</p>	<p>The means of verification and most of the mitigation measures have been moved to 'a new standalone document'. Stakeholders cannot properly react to criteria and indicators which have no attached mitigation measures or means of verification because it is an incomplete picture. Stakeholders could inadvertently endorse concepts that they do not fully support once this standalone document is written, particularly given that contentious issues, such as soil quality, forest carbon, HCV areas, etc will be covered in this new document. There are too many unknowns for stakeholders to fully react and provide constructive feedback to Standards 1 and 2. Further, the reasoning for moving means of verification and mitigation measures to a standalone document is not clear. What problem is this move trying to solve? What shortcomings is this move looking to fix? And finally, it is unclear whether this document will be normative. If this document is moved outside the standards, additional concerns are raised. Firstly, this would allow this document to be revised at will rather than through a robust stakeholder process, such as the formal 5-year review process. Secondly, the standard will appear overall weaker, as the mitigation measures will be less obvious to third parties. And lastly, the mitigation measures and means of verification will hold less weight if positioned outside the standards, creating confusion for certificate holders and making audits more difficult.</p>	<p>In Revision Draft v2, the Impacts – as normative requirements – have been incorporated into Standard 1, whereas the Means of Verification (MoV) and Sources of Information – as non-normative – will form part of a separate (to be developed), non-normative document.</p>
<p>S1</p> <p>Background and Scope</p>	<p>PEFC/FSC recognition – In the SBP webinar held on Monday July 19th, the SBP Secretariat stated that the PEFC and FSC recognition within SBP would be eliminated, with a long transition period. As indicated in our comments to the first consultation, as well as comments from other stakeholders, this move is not supported. Why were these comments not taken into account? Stakeholder comments supported maintaining the PEFC/FSC recognition, can you provide clarity on why these comments were not followed?</p>	<p>Working Group A decided, based on extensive discussions considering external and expert input, to set up a stand-alone SBP system. This decision is in line with discussion conclusions in SBP Committees. A sufficiently long transition period (18 months from effective date) will be provided.</p>

<p>S1</p> <p>Background and Scope</p>	<p>On Scope - Need to ensure this section is consistent with definitions of ,forest ' , biomass ' , and ,feedstock 'in the Glossary, and that these definitions are agreed upon by all stakeholders. We have not seen a revision draft of the Glossary and the Glossary subgroup has not met in some time.</p>	<p>The working draft of the Glossary has been made available, as part of the second public consultation. All definitions are being carefully checked.</p>
<p>S1</p> <p>Background and Scope</p>	<p>On Normative Elements - The SBP Secretariat has stated that ,shall 'or ,must 'indicate a normative requirement, meaning that certificate holders must prove a supplier or contractor is in compliance, and that must be audited. This will be impossible or extremely difficult for some suppliers, particularly when it comes to labour requirements. Suppliers are private entities, and it is not appropriate for biomass producers to have control or insight into some internal practices and policies. There is a line between employee and contractor and the SBP standard must recognize this. The US IRS uses 3 basic categories to determine if a worker is an employee or a contractor, which could be helpful for the process - https://www.irs.gov/newsroom/understanding-employee-vs-contractor-designation A thorough legal analysis must be performed before Principle 4 can move forward.</p>	<p>Working Group A recommends that SBP clarifies if it is necessary to do a legal review of Principle 4, possibly as part of piloting the Standards.</p> <p>Working Group A recommends that SBP should consider whether it takes on the role of undertaking reviews of Standard 1 against Supply Base laws where risks are high and/or capacity to do so by Organisations is limited.</p> <p>Limitations of due diligence of third parties have been dealt with in section 6.3 of Standard 2.</p>
<p>S1</p> <p>Background and Scope</p>	<p>On Normative Elements - Need a clearer definition of "other relevant operators". Does this include port operators?</p>	<p>The definition of relevant operators in the Glossary is: 'Operators in the supply chain between the place of harvest and the Organisation'. Inclusion of port operators will, therefore, depend on where the Organisation is in the supply chain.</p>
<p>S1</p> <p>Background and Scope</p>	<p>On 2.3 The Role of the Organization - Need clearer text on when this will be "necessary". In the event of SFM certified material and/or gaps within regulatory compliance (REDII for example), a limited SBE is needed to cover those gaps. The wording here indicates a full SBE could be needed.</p>	<p>The text for Supply Base Evaluation (SBE) requirements had been improved in Revision Draft V2 of Standard 2.</p>
<p>S1</p> <p>Background and Scope</p>	<p>On the whole document - Consistency is needed. Organization is sometimes capitalized and sometimes is not.</p>	<p>Consistency checks and text editing are ongoing.</p>
<p>S1</p> <p>Background and Scope</p>	<p>Generally, not having the separate MOV document available for review with Standard 1 is a bit awkward. There is no clear way for a stakeholder to know if the currently accepted MOVs are still available for use or if MOV's end up being onerous beyond the ability of an organization to meet.</p>	<p>In Revision Draft v2, the Impacts – as normative requirements – have been re-incorporated into Standard 1, whereas the MOV and Sources of Information – as non-normative – will form part of a separate (to be developed) non-normative document.</p>
<p>S1</p> <p>Background and Scope</p>	<p>2.2 The use of "shall" in the guidance to indicate portions as normative could be confusing. If items are required, then they should be defined as required MOVs. In Standard 1 does the term "must" also mean it is normative as it does in the Standard 2 draft? It is undefined as such in the Explanatory Notes version.</p>	<p>Working Group A reiterated that in principle if clearly indicated by 'shall' then some guidance will be considered as mandatory.</p>
<p>S1</p> <p>Background and Scope</p>	<p>I feel the survey is set up poorly. There should have been text boxes for stakeholders to individually comment on each indicator. Many of the indicators have normative guidance that is not acceptable and there is no way to comment on them.</p>	<p>Given the technical limitations of the survey tool we tried to set it up as efficiently and effectively as possible. Just type all comments you may have. We will consider them.</p>

<p>S1</p> <p>Background and Scope</p>	<p>My general concern with the update to this standard is the removal of statement 2 in section 2.1 that related to producers with SFI or FSC certification and allowing that to meet the standard. This coupled with the SBE section being moved to standard 2 will create what I see as duplicative work. Currently we are only certified to Standards 2, 4 and 5 because we only use Internal secondary feedstock from our sawmill to produce pellets. However, the way I am understanding this is that we will now have to be certified to Standard 1 at some point and with the movement of the SBE information to Standard 2 likely lead to having to complete an SBE. The SBE was waived for producers such as ours in the past but now it isn't? It would be really good if SBP would fully recognize SFI and FSC SFM and Fibre Sourcing certification. The duplicative effort to meet very similar standards related to utilization of residual fibre from a primary sawmill doesn't make sense to us.</p>	<p>The Working Groups decided, based on extensive discussions considering external and expert input, to set up a stand-alone SBP system. This decision is in line with discussion conclusions in SBP Committees. A sufficiently long transition period (18 months from effective date) will be provided.</p>
<p>S1</p> <p>Background and Scope</p>	<p>Use of Biomass Producer (BP) in the original standard is preferred over the use of Organization. The need or benefit to making this change is unclear.</p>	<p>The use of the term 'Organisation' is maintained, to address amongst others, vertically integrated companies.</p>
<p>S1</p> <p>Background and Scope</p>	<p>Why are the Means of Verification being moved to a new document? Having them included in Standard 1 seems more straightforward. I'm also concerned that I haven't seen the MOVs yet.</p>	<p>In Revision Draft v2, the Impacts – as normative requirements – have been re-incorporated into Standard 1, whereas the Mov and Sources of Information – as non-normative – will form part of a separate (to be developed) non-normative document.</p>
<p>S1</p> <p>Background and Scope</p>	<p>Background: "Where 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." -> Does this mean that SBP is no longer specifically making the standard meet regulatory requirements? The Dutch requirements which are rather different from other countries jumps to mind.</p>	<p>Not necessarily. The revised Standards will meet regulatory requirements, such as REDII, most likely by applying additional Instruction Documents for specific frameworks, as currently done, for example, in case of Dutch requirements. Discussions on details are ongoing and following current EU developments on REDII implementation clarifications.</p>
<p>S1</p> <p>Background and Scope</p>	<p>Scope (Current Standard Text): "Feedstock shall not be sourced from large (>1000 ha) short rotation plantations that are fully dedicated to the production of biomass and that were established after 1 January 2015". -> Why has this been deleted in the new version?</p>	<p>No longer deemed to be relevant.</p>
<p>S1</p> <p>Background and Scope</p>	<p>A credible certification system that has broad stakeholder acceptance is essential for [...] operations and underpins the social license to operate of the wider biomass sector. To achieve this will require greater stakeholder buy-in than is currently the case.</p>	<p>Working Group A agreed, mechanisms are in in development.</p>
<p>S1</p> <p>Background and Scope</p>	<p>It is not clear from SBP's recent messaging if SBP's strategy is to meaningfully exceed minimum regulatory compliance. SBP needs to clearly communicate its intent in relation to developing a multi-stakeholder standard in line with the published Standards Development Process Terms of Reference.</p>	<p>The Standard Development Process follows its Terms of Reference, which are clearly based on a multi-stakeholder approach, and to develop a revised set of Standards that delivers against SBP's purpose and mission. Where practicable and where there is consensus to go further than regulatory compliance that will be done.</p>

<p>S1</p> <p>Background and Scope</p>	<p>If the intent is to exceed minimum regulatory compliance and demonstrate positive outcomes SBP will need to develop resources to support certification including stakeholder engagement, technical support for undertaking SBE/RAA, monitoring (e.g., remote sensing), and GHG calculation support hub.</p>	<p>SBP is exploring options for enhancing stakeholder engagement.</p>
<p>S1</p> <p>Background and Scope</p>	<p>Principle 5 does not appear in these drafts as it was proposed by the Impacts and Monitoring subgroup. The explanatory note asks stakeholders where this principle should be placed. We suggest it belongs in Standard 1 as it was originally designed to be. Principle 5 offers a realistic risk-based approach to delivering positive outcomes.</p>	<p>The integration of Principle 5 into the scheme is an ongoing discussion among SBP Committees and stakeholders. Independent from placing it in the Standards themselves or elsewhere, the content of "PS" will be considered as part of the normative SBP system.</p>
<p>S1</p> <p>Background and Scope</p>	<p>The Standards should be revised in line with the published Standards Development Process Terms of Reference where the process and role of the various governance bodies of the Standards Committee and Board are set out. This was agreed following stakeholder consultation prior to commencing the process and will help to ensure that stakeholders continue to have confidence that they can meaningfully influence both the content and decision making and allay fears that the standards are industry driven.</p>	<p>Working Group A agreed. SBP is ensuring that the process is followed.</p>
<p>S1</p> <p>Background and Scope</p>	<p>The linkage to other relevant schemes, including FSC/PEFC and the practical implications for certificate holders and supply chains (both short and medium term) of disengagement from these schemes needs to be more explicit.</p>	<p>Linkages have been made in the text where appropriate. Further details given in Revision Draft v2, and will form part of training/information measures.</p>
<p>S1</p> <p>Background and Scope</p>	<p>We recommend using the term Biomass Producer in standards 1 and 2 to make clear that these standards are only applicable to this set of certificate holders.</p>	<p>Agreement in Working Groups to continue using the term "Organisation". Standard users are not only Biomass Producers.</p>
<p>S1</p>	<p>We are not commenting on the detail of Standard 2, however, we recognize the need for ensuring the criteria and indicators developed in Standard 1 have clear means of verification and that the Standards (and any explanatory/guidance documents) are developed in parallel. If the approaches to verification and mitigation are not closely aligned there is a concern that unrealistic expectations may cause unnecessary complications in compliance and/or verification. For example, the explanatory note for 6.3 requiring that suppliers and contractors must assess their own risk of compliance with the Standard is unrealistic and should be reworded to put the onus on the certificate holder themselves.</p>	<p>Agreed. An MoV document is being developed and will be made available soon. Standard 2, section 6.3 was revised to address the identified issue. In Revision Draft v2, the Impacts – as normative requirements – have been re-incorporated into Standard 1, whereas the MoV and Sources of Information – as non-normative – will form part of a separate (to be developed) non-normative document.</p>
<p>S1</p> <p>Background and Scope</p>	<p>Multi-stakeholder engagement is critical to the future success of SBP and the biomass industry. NGO disengagement during the standards revision process due to the limited ambition shown by SBP (e.g., only considering 'incremental change') has led to a significant credibility risk. To provide the biomass sector with the required credibility certification system SBP needs to actively engage with NGOs and to demonstrate how the diverse range of views expressed on biomass sustainability are being considered in the standards. This may require new approaches to engagement to minimise the disproportionate resource burden for non-industry stakeholders.</p>	<p>Working Group A agreed. SBP is exploring options for enhancing stakeholder engagement. SBP is now an ISEAL Community Member and will engage in this community.</p>

<p>S1 Background and Scope</p>	<p>SBP has already engaged widely with stakeholders, notably through the series of five topic specific and Theory of Change workshops held in Q4 2020 and Q1 2021. It should be explicitly demonstrated how the comments received during these extensive stakeholder engagement processes have been considered in the development of the current drafts. The Theory of Change is required to be completed ensure that the Standards are delivering on SBP's purpose and that claims (enabling climate goals to be met) are justified. This will help ensure that there is no perceived gap between what SBP claims and what the standards deliver.</p>	<p>This document attempts to show how public consultation comments have been addressed.</p> <p>All steps in the Standards Development Process follow the Terms of Reference and are documented. SBP's Theory of Change is publicly available on SBP's website.</p>
<p>S1 Background and Scope</p>	<p>The Standards should be revised in line with the published Standards Development Process Terms of Reference where the process and role of the various governance bodies of the Standards Committee and Board are set out. This was agreed following stakeholder consultation prior to commencing the process and will help to ensure that stakeholders continue to have confidence that they can meaningfully influence both the content and decision making and allay fears that the standards are industry driven. The draft standards will be required to be modified to enable compliance with the recast RED (3) requirements, and the RED2 implementing Act.</p>	<p>Working Group A agreed. SBP has been ensuring compliance.</p> <p>REDIII compliance will become a topic come after the Standards Development Process has been concluded.</p> <p>All steps in the Standards Development Process follow the Terms of Reference and are documented. Current and upcoming EU directives and regulations will be addressed either in the revised Standards directly, or in additional normative documents, which will address future regulatory changes. The development of these documents will follow SBP's agreed Document Development Procedure.</p>
<p>S1 Background and Scope</p>	<p>The standards need to be future proofed for forthcoming regulation including anticipated EU requirements on Human Rights in Supply Chains and zero deforestation. A scanning of forthcoming regulation should feed into the standards development.</p>	<p>An early review of emerging issues was conducted by SBP.</p> <p>SBP's workstream on Monitoring and Evaluation is monitoring developments relevant to the Standards and to SBP's purpose.</p>
<p>S1 Background and Scope</p>	<p>SBP should continue to recognise FSC/PEFC schemes to ensure SBP remains aligned to internationally recognised sustainable forestry standards. Where gaps between FSC/PEFC and REDII requirements exist – these should be addressed through a 'top-up' standard, or by identifying which criterion in Standard 1 can be met through FSC/PEFC certification. The standards should be aligned where possible to other existing systems, such as ISO-standards for efficient implementation of the set of systems the operators have to implement. Whilst SBP provides a sourcing standard to ensure the sustainability of feedstock used in the production of biomass the suite of standards also need ensure supply chains are meeting or exceeding current and expected ESG norms.</p>	<p>See comments above.</p> <p>These considerations are intensively discussed in the Working Groups, and it is commonly agreed that the SBP Standards should build on existing schemes' terminology wherever possible. For example, the terms and definitions are aligned with those of widely accepted systems, regulations, and standards, such as ILO conventions, ISO norms, and other voluntary standards, such as FSC.</p> <p>The revised Standards include a comprehensive chain-of-custody system.</p>
<p>S1 Background and Scope</p>	<p>The standards should make explicit the intent of the requirements and provide supporting guidance and examples where required.</p>	<p>Revision Draft v2 has removed MOVs from Standard 1. The use of 'shall' indicates which elements of the text are mandatory.</p> <p>In Revision Draft v2, intent and impacts for each requirement are part of Standard 1.</p>
<p>S1 Background and Scope</p>	<p>The option should be considered for mechanisms to exclude or remove bad actors that may be associated with certificate holders. Other schemes include this in Instruments such as a Policy of Association.</p>	<p>Out of scope for this Standards Development Process, but the suggestion has been forwarded to SBP.</p>

<p>S1</p> <p>Background and Scope</p>	<p>To ensure a well-functioning certification scheme, going beyond regulatory compliance while minimising administrative burden/expert technical knowledge, SBP will need to develop resources and tools to support certification including stakeholder engagement, technical support for undertaking SBE/RRR, monitoring (e.g., remote sensing), and GHG calculation support. [...] has already supported SBP in this regard, transferring rights for its Biomass Carbon Calculator, and is willing to identify and support on developing further resources in the future. These should be developed through multi-stakeholder processes wherever possible.</p>	<p>Working Group A recommends that SBP should set up support tools.</p> <p>Working Group A agreed and has specified some additional guidance that needs to be developed (e.g., on carbon) and areas where SBP could usefully gather existing Best Management Practices. On other areas, such as HCV and stakeholder engagement, Working Group A recommends that SBP should take the lead on behalf of Organisations</p> <p>SBP will provide a GHG calculator to its users, to be used on voluntary basis.</p>
<p>S1</p> <p>Background and Scope</p>	<p>We share the view that approaches to biodiversity, FPIC and output vs. process indicators will be important in ensuring the credibility of the standards. We would welcome SBP setting out the options and implications in more detail, including specifically of SBP taking an active centralised role in co-ordinating identification and monitoring of risks.</p>	<p>Agreed (see above).</p>
<p>S1</p> <p>Background and Scope</p>	<p>It would be helpful to ensure that the language through the documents is aligned such that either risk is evaluated for each indicator, or compliance is evaluated with each indicator.</p>	<p>The editorial team was tasked with ensuring consistency throughout the text.</p>
<p>S1</p> <p>Background and Scope</p>	<p>We recommend using the term Biomass Producer in standards 1 and 2 to make clear that these standards are only applicable to this set of certificate holders.</p>	<p>Working Group A agreed to use the term 'Organisation' to ensure that the Standards apply to a wider range of bodies than just Biomass Producers.</p> <p>The use of the term "Organisation" is maintained, to address amongst others, vertically integrated companies. The glossary provides a clear definition.</p>
<p>S1</p> <p>Background and Scope</p>	<p>To better demonstrate SBP is meeting its purpose, SBP need to clearly link the Standard/SBP reporting obligations to carbon accounting across the supply chain – this can be broken down into three components: 1) Impact on LULUCF emissions 2) Impact on Energy sector emissions 3) Impact on remaining sectors impacted throughout the supply chain 1. Impact of SBP biomass on LULUCF sector should be demonstrated through inclusion of LULUCF criteria in Article 29 paragraph 7 of the Renewable Energy Directive – currently being discussed in forest carbon working group. 2. Impact on energy sector is demonstrated by use of biomass fuel reported as zero within national inventories. However, SBP should recognise further opportunities here e.g., opportunities for bioenergy with CCS to deliver carbon negative emissions in the Energy sector. 3. By transferring rights to our Biomass Carbon Calculator across to SBP, [...] has made a significant contribution to improved supply chain emission reporting which SBP should build upon. SBP should report on the carbon impact of supply chains using aggregated data from end users. SBP should identify future opportunities to improve carbon reporting – e.g., by including GHG calculation as part of a BP audit and require carbon intensity data to be passed through the DTs.</p>	<p>The full suite of Standards is aiming to ensure that there is reporting and accounting, or at least justification, for sourcing decisions that have an impact on carbon throughout the supply chain.</p>
<p>S1</p> <p>Background and Scope</p>	<p>SBP should be more ambitious with its purpose – to not only help countries and corporates meet climate goals, but to deliver a carbon negative industry. [...] are willing to support SBP in driving forward a carbon negative agenda for the wider industry.</p>	<p>Unfortunately, there was no consensus reached on this issue. Inevitably, the final text is a compromise representing where consensus could be reached on ambition.</p>

		<p>Working Group A recommends that SBP discuss this overarching topic further amongst the relevant governance bodies.</p>
<p>S1</p> <p>Background and Scope</p>	<p>[...] is not commenting on the detail of Standard 2. However, we recognise the need for ensuring those criteria and indicators developed in Standard 1 have clear means of verification and mitigation. There is therefore a need to ensure the standards are developed in parallel, and that approaches to verification and mitigation are considered closely alongside the development of criteria and indicators.</p>	<p>In Revision Draft v2, the Impacts – as normative requirements – have been re-incorporated into Standard 1, whereas the MoV and Sources of Information – as non-normative – will form part of a separate (to be developed) non-normative document.</p>
<p>S1</p> <p>General comments: Standard 1 - Feedstock Compliance: Background and Scope</p>	<p>[...] is a timber growing and forest products company that owns and manages almost 1.1 million acres (4.5 million hectares) of timberland in the United States and manages significant holdings in Canada as well. All of [...]’s timberlands are certified under the forest management standards of the Sustainable Forestry Initiative® (SFI; www.forests.org). Similar to other certification programs, SFI holds participants to a standard that ensures conservation of at-risk species and communities and requires that programs are in place to address biodiversity. The SFI also requires member companies to meet or exceed all state Best Management Practices (BMPs) for the protection of water quality. [...] is not biomass producer but does sell fibre into the biomass market in the form of small trees during thinning, as well as tops, limbs and otherwise unmerchantable material (e.g., broken or hollow stems). Biomass producers provide a critical valuable service to landowners looking for an economic incentive to continue managing their forests as forests. [...] provides the following comments: Principle 5 It is very disappointing that the Secretariat or other internal SBP group made the decision to move Principle 5 out of the scope of Standard 1. Principle 5 brings active participation, outreach, education and research to S1 and the SBP. Too much time and effort go into developing proposals such as P5 for it to be deleted from consideration without justification or warning. P5 is designed to bring BPs into the forestry community and provide proactive support to forest landowners (outreach), forest workers (training and education opportunities), and to discover answers about how biomass impacts the region or landscape (research). This is the most outward and forward looking of the principles. Standalone document There is too much ambiguity and uncertainty to support the idea of the “standalone document.” it’s uncertain whether the mitigation measures or means of verification will be suggestive or normative. Though there was some improvements and clarifications needed in the previous S1 for MoV and Guidance statements, going to a SAD creates too many questions. E.g., who’s going to draft the SAD? how will it be vetted by the BPs? are we looking at another drawn-out affair similar to updating the SBP Standard? And if the SAD sits outside the Standard, will it be subject to frequent updates, interpretations and additions.</p>	<p>Thinking around how Organisations can demonstrate collaboration, innovation and delivering at scale has not been lost, but no consensus was reached on incorporating it directly within Standard 1. The issue has been presented to SBP for exploring alternative action.</p> <p>The integration of Principle 5 into the scheme is an ongoing discussion amongst SBP Committees and stakeholders. Whether placed in the Standard itself or elsewhere, the content of ‘Principle 5’ will be part of the normative SBP system.</p> <p>In Revision Draft v2, the Impacts – as normative requirements – have been incorporated into Standard 1, whereas the MoV and Sources of Information – as non-normative – will form part of a separate (to be developed) non-normative document.</p>
<p>S1</p> <p>Principle 1 - Legality</p>	<p>For all the Principles - Is Sources of Information to include a requirement or guidance? Indicator 1.1.1 has a lot of different topics which require different evidence. I suggest breaking it up a bit based on what kind of evidence is needed to show low risk. For example, ownership, health and safety, and CITES/species are all very different topics.</p> <p>Indicator 1.1.1: The information below the bullet points adds a lot of useful information. It would be helpful if the “Health and Safety Standards” bullet point was included in the information.</p>	<p>There was no need for a second criterion.</p> <p>It was acknowledged that there are a lot of issues wrapped up in a single indicator, but it was felt that the requirement to keep a register of relevant laws was sufficient to make it clear what was expected.</p>

		Indicator 1.1.1: In "Sources of Further Information" there is no link for Health and safety topics. It would be helpful if there was one to add clarity on what sort of information you were looking for there.	
S1	Indicator 2.2.3	Suggest not using the word Shall in the title of the Guidance statement. If it is guidance it, by default, does not mean shall. Nutrient balance, fertility and cycling is unrealistic to understand and evaluate when the BP is not the owner of the forest. This should be moved down in priority to other impacts that could be identified.	It was decided not to change the approach taken to 'shall' within guidance. However, it was acknowledged that, in case concerns about the mandatory status of guidance in relation to specific indicators arise, the status of the guidance should be re-examined by the relevant Sub-groups.
S1	Indicator 2.2.3:	The guidance here has not been agreed to by the natural capital and biodiversity subgroup. The subgroup has not agreed to include these impacts in the guidance. This appears to be a creeping in of the language from the December 2019 drafts provided by the Secretariat, which resulted in a negative opinion from many stakeholders and was done away with. Soil monitoring technologies and best practices are still evolving. Salinisation, acidification, and others do not yet have agreed up on methodologies. Because biomass producers do not own or manage their own forest lands, this is not practically implementable or auditable. This language should be removed from the draft revisions as it has not been agreed upon or proposed by the subgroup and presents a significant burden for certificate holders.	No change – in principle we can have mandatory guidance as long as it is clearly signalled in the Introduction. 'Impacts in Standard 1 are re-worded to ensure that they do not to come across as performance outcomes, for example, references to 'is maintained', 'enhanced', etc have been removed.
S1	Indicator 2.2.3	The list of forest soils criteria is problematic. Many of the items listed are not well researched and making them a requirement is not a great idea. Rather than suggesting these be included maybe SBP could add P5 back into S1 and make these some projects they can work on for the next standards revision. I think the current 2.2.2 soils indicator should be used.	No change – in principle we can have mandatory guidance as long as it is clearly signalled in the Introduction. 'Impacts in Standard 1 are re-worded to ensure that they do not to come across as performance outcomes, for example, references to 'is maintained', 'enhanced', etc have been removed.
S1	Indicator 2.2.3	There is significant concern regarding the "standalone" document. Without more detail regarding its content, it's difficult to make a judgement on this indicator and guidance. It is disappointing that this language has returned to the Standard following strong dissent by members of the natural capital subgroup. There is an expectation ("shall") that the BPs will assess these numerous variables when for the most part there is not a standard or viable methodology for completing the analysis at the scale of an SBE. Currently, in the US, BPs do not manage the property they purchase biomass from, so they would have to depend on publicly available data - which is not available for most of these variables.	No change – in principle we can have mandatory guidance as long as it is clearly signalled in the Introduction. 'Impacts in Standard 1 are re-worded to ensure that they do not to come across as performance outcomes, for example, references to 'is maintained', 'enhanced', etc have been removed.
S1	Indicator 2.2.3	We encourage SBP to engage with subject specialist stakeholders.	Specialists continue to be involved at different levels of decision-making and preparation of Standards content.
S1	Indicator 2.2.4	I think the suggested guidance should be replaced with the current guidance. Proving the suggested guidance is not realistic given the information currently available on these subjects.	Guidance edited: Likely impacts of residue removal, as well as the absence of that material once removed, should be identified, and appropriate mitigation measures implemented.

			<p>Possible impacts include but are not limited to:</p> <ul style="list-style-type: none"> Impacts on soil quality – fertility, organic matter content, structure and compaction, water retention and chemistry (link to 2.2.3). Impacts on carbon storage (link to 3.1.1) Impacts on biodiversity - availability of dead organic matter serving as a niche and food source for wildlife.
S1	Indicator 2.2.4	Impacts of residue removal on ecosystems, and the degree to which biomass sourcing is affecting residue removal, is an area that needs further research. In the US there are limited studies based on experimental manipulation of residues over short time periods. This would be a very good place for SBP to engage to encourage advances in knowledge. In the short-term, suggest changing the wording in the indicator to be more flexible, i.e., change “include but not limited to” to “some considerations might be...” Guidance should not be seen to be prescriptive, especially in this situation.	<p>Guidance edited:</p> <p>Likely impacts of residue removal, as well as the absence of that material once removed, should be identified, and appropriate mitigation measures implemented.</p> <p>Possible impacts include but are not limited to:</p> <ul style="list-style-type: none"> Impacts on soil quality – fertility, organic matter content, structure and compaction, water retention and chemistry (link to 2.2.3). Impacts on carbon storage (link to 3.1.1) Impacts on biodiversity - availability of dead organic matter serving as a niche and food source for wildlife.
S1	Indicator 2.2.4	There is significant concern regarding the “standalone” document. Without more detail regarding its content, it’s difficult to make a judgement on this indicator and guidance.	<p>In Revision Draft v2, the impacts – as normative requirements – have been incorporated into Standard 1, whereas the Mov and Sources of Information – as non-normative – will form part of a separate (to be developed) non-normative document.</p>
S1	Indicator 2.2.4	We encourage SBP to engage with subject specialist stakeholders.	<p>Specialists continue to be involved at different levels of decision-making and preparation of Standards content</p>
S1	Indicator 2.2.4	Impacts of residue removal on ecosystems, and the degree to which biomass sourcing is affecting residue removal, is an area that needs further research. In the US there are limited studies based on experimental manipulation of residues over short time periods. This would be a very good place for SBP to engage to encourage advances in knowledge. In the short-term, suggest changing the wording in the indicator to be more flexible, i.e., change “include but not limited to” to “some considerations might be...” Guidance should not be seen to be prescriptive, especially in this situation.	<p>Guidance edited:</p> <p>Likely impacts of residue removal, as well as the absence of that material once removed, should be identified, and appropriate mitigation measures implemented.</p> <p>Possible impacts include but are not limited to:</p> <ul style="list-style-type: none"> Impacts on soil quality – fertility, organic matter content, structure and compaction, water retention and chemistry (link to 2.2.3). Impacts on carbon storage (link to 3.1.1)

			Impacts on biodiversity - availability of dead organic matter serving as a niche and food source for wildlife.
S1	Indicator 2.2.4	The Guidance should be "Likely impacts of residue removal may include:" How does one estimate the "Impacts of the process of residue removal, as well as the absence of that material once removed? »? It's like proving a negative. It should be removed Impacts on soil quality should be removed since it is already addressed in the current 2.2.2. Impacts to carbon storage should be removed since it is in the carbon indicators. Actually, to limit text, I think the suggested guidance should be replaced with the current guidance. Proving the suggested guidance is not realistic given the information currently available on these subjects.	No change - we have accepted in principle that we can repeat significant issues to strengthen them. However, the editors will ensure that each bullet links through to other relevant indicators.
S1	Indicator 2.2.4	There is significant concern regarding the "standalone" document. Without more detail regarding its content, it's difficult to make a judgement on this indicator and guidance. Suggest removing: "Impacts on biodiversity - availability of dead organic matter serving as a niche and food source for wildlife" This is redundant to conservation of biodiversity.	Guidance edited: Likely impacts of residue removal, as well as the absence of that material once removed, should be identified, and appropriate mitigation measures implemented. Possible impacts include but are not limited to: Impacts on soil quality – fertility, organic matter content, structure and compaction, water retention and chemistry (link to 2.2.3). Impacts on carbon storage (link to 3.1.1) Impacts on biodiversity - availability of dead organic matter serving as a niche and food source for wildlife.
S1	Indicator 2.2.4	We encourage SBP to engage with subject specialist stakeholders.	Specialists continue to be involved at different levels of decision-making and preparation of Standards content
S1	Indicator 2.2.5	I think the suggested guidance should be replaced with the current guidance. Verifying against the suggested guidance is not realistic given the information currently available on these subjects.	We have explored the scope of influence many times. In principle, we are seeking to find the available 'levers' for Biomass Producers to bring about the desired outcomes where there are possible serious impacts. And by making the impacts more explicit we are signalling that what needs to be assessed and managed is seen to be a risk. The only difference is a list of possible impacts – there is no substantive change to the indicator.
S1	Indicator 2.2.5	There is significant concern regarding the "standalone" document. Without more detail regarding its content, it's difficult to make a judgement on this indicator and guidance.	We have explored the scope of influence many times. In principle, we are seeking to find the available 'levers' for Biomass Producers to bring about the desired outcomes where there are possible serious impacts. And by making the impacts more explicit we are signalling that what needs to be assessed and managed is seen to be a risk.

			The only difference is a list of possible impacts – there is no substantive change to the indicator.
S1	Indicator 2.2.5	We encourage SBP to engage subject area experts but to be cautious about incorporating indicators that are not appropriate to the level of certificate holder influence. For example, evaluation of groundwater seems inappropriate when the BP does not own the lands it sources from.	Specialists continue to be involved at different levels of decision-making and preparation of Standards content.
S1	Indicator 2.2.5	We encourage SBP to engage with subject specialist stakeholders.	Specialists continue to be involved at different levels of decision-making and preparation of Standards content.
S1	Principle 2	1 - The HCVA (capitalized) has not been agreed upon or endorsed by the biodiversity and natural capital subgroup. The subgroup has not agreed to include reference to it in the guidance. This appears to be a creeping in of the language from the December 2019 drafts provided by the Secretariat, which resulted in a negative opinion from many stakeholders and was done away with. This language should be removed from the draft revisions, as it has not been agreed upon or proposed by the subgroup. Further, in the SBP webinar on Monday, July 19th, the Chair of WGA stated that the Natural Capital and Biodiversity subgroup had been unable to decide how to move forward with HCVA. This is not the understanding of the members of the subgroup. The subgroup does not wish to include HCVA in the Standard.	Leave HCVA in guidance as a best practice – remove ‘, should be followed’ - keep the need to justify choice of tool; Request SBP to facilitate or undertake SB level HCV assessments using the HCVRN approach where there is a high risk to their conservation and/or where capacity and tools to do so are otherwise limited or missing.
S1	Principle 2	2.1.1 - Agree with the consolidation of the biodiversity, high conservation values, key ecosystems, and key habitats into a single indicator. Although it is logical to reference the HCVA (capitalized) method, the natural capital subgroup agreed that it only be referenced as “best practice,” therefore it is recommended that the word “should be followed whenever possible” be removed from this guidance statement.	Working Group A decided to leave HCVA in guidance as an example for best practice and remove ‘should be followed’ and keep the need to justify choice of tool; Working Group A suggests SBP to facilitate or undertake Supply Base level HCV assessments using the HCVRN approach where there is a high risk to their conservation and/or where capacity and tools to do so are otherwise limited or missing.
S1	Principle 2	2.1.2 - Agree with an indicator addressing general biodiversity considerations, separate from protection of key species, habitats, and ecosystems. However, to improve clarity, suggest refining the indicator title to directly reflect “general biodiversity”. This would assure that there is no redundancy in response to Indicator 2.1.1.	Working Group A decided to change indicator text to “general biodiversity”.
S1	Principle 2	2.2.3 - Suggest not using the word “shall” in the title of the Guidance statement. If it is guidance it, by default, does not mean shall. Nutrient balance, fertility and cycling is unrealistic to understand and evaluate when the BP is not the owner of the forest. This should be moved down in priority to “Other impacts” that could be identified. Soil monitoring technologies and best practices are still evolving. Salinisation, acidification, and others do not yet have agreed up on methodologies. Because biomass producers do not own or manage their own forest lands, this is not practically implementable or auditable. 2.2.5 - Evaluation of groundwater seems inappropriate when the BP does not own the lands it sources from.	It was decided not to change the approach taken to ‘shall’ within the guidance. However, it was acknowledged that when concerns about mandatory guidance in relation to specific indicators should be re-examined by the relevant sub-groups (see proposals today)

S1	Principle 2 2.2.3 The "sources of information include" section for 2.2.3 references SFI Guidance to SFI 2015-2019, Standards and Rules January 2017 Chapter 6.1 SFI 2016-2019 Forest Management Standard Objective 4: Conservation of Biological Diversity. Forests with Exceptional Conservation Value". This reference is specifically for Forestland owners and is confusing on what information you're hoping a BP will include. Could you please be more specific on whether it's just the definition that is an important source, or whether you're expecting information that can only come from the landowner, which will receive push-back as BPs don't typically own land.	Working Group A decided to include the proposed text in the sources of information section.
S1	Principle 2 2.1.2 Why are there no "sources of information to include" for this indicator?	Sources of information will be included in a separate, guidance document, whereas impacts have been included in Standard 1.
S1	Principle 2 2.2.2 Why are there no "Sources of information to include" for this indicator?	Sources of information will be included in a separate, guidance document, whereas impacts have been included in Standard 1.
S1	Principle 2 2.2.3 Could you please give examples on what sort of evidence would suffice from a risk-based assessment perspective for "Nutrient balance, fertility and cycling is maintained", "Contamination is prevented and minimised", "Salinisation and alkalinisation", "acidification", "soil biodiversity impacts", "sealing", "soil water management"	Working Group A agreed to the request. An impacts paper is in development.
S1	Principle 2 2.2.4 Missing "Sources of information to include" for this indicator	Sources of information will be included in a separate, guidance document, whereas impacts have been included in Standard 1.
S1	Principle 2 2.2.5 Missing "Sources of information to include" for this indicator	Sources of information will be included in a separate, guidance document, whereas impacts have been included in Standard 1.
S1	Principle 2 2.2.6 Missing "Sources of information to include" for this indicator	Sources of information will be included in a separate, guidance document, whereas impacts have been included in Standard 1.
S1	Principle 2 2.2.7 "Chemical use should be justified, and there should be evidence that non-chemical alternatives have been considered" This is hard to implement from a risk-based approach and rings as a Forest Management standard. How would this guidance be implementable for a BP?	No change - there is no change from current text
S1	Principle 2 2.2.8 There is no guidance to this section at all. It's very useful to have both the guidance and sources of information to include to direct BPs on what sort of evidence you're looking for.	Unable to identify any further guidance.
S1	Principle 2 2.2.9 The Guidance links back to Principle 3. Please give an exact indicator or list of indicators if possible.	Guidance text is reviewed in Revision Draft v2.
S1	Principle 2 2.2.12 There is no guidance to this section at all. It's very useful to have both the guidance and sources of information to include to direct BPs on what sort of evidence you're looking for.	Unable to identify any further guidance.

<p>S1</p> <p>Principle 2</p>	<p>Removal of the suggested MoVs without publication of the draft document they will be contained in makes assessment of the principle difficult. Will the original MoVs still be used?</p>	<p>In Revision Draft v2, the impacts – as normative requirements – have been incorporated in Standard 1, whereas the MoV and Sources of Information – as non-normative – will form part of a separate (to be developed) non-normative document.</p> <p>Working Group A concluded that it was premature to include ILUC in the Standard.</p>
<p>S1</p> <p>Principle 2</p>	<p>Currently, there are no widely agreed upon methods for evaluating and measuring ILUC. Risk of ILUC from biomass sourcing is very low considering biomass' place at the bottom of the forest value chain. Because biomass producers do not own or manage their own forests, it is not practical or auditable to include ILUC in the standard. This would represent significant additional burden for certificate holders.</p>	<p>ILUC is not included.</p>
<p>S1</p> <p>Principle 2</p>	<p>ILUC, as it is widely modelled, represents the price-induced impact of an increase in biomass demand on land carbon stocks. As Principle 3 seeks to identify and mitigate risks of biomass demand causing changes in carbon stock on a regional basis and makes several references to the use of economic data within the supply base as evidence against the indicators therein, the core principles underpinning ILUC modelling is already built into the proposed Standard revisions. However, future efforts of SBP should seek to better quantify impacts of biomass demand on carbon stocks through utilization of modelling approaches consistent with the ILUC approach (i.e., econometric modelling).</p>	<p>ILUC is not included.</p>
<p>S1</p> <p>Principle 2</p>	<p>It is critical that sustainably sourced biomass does not cause depletion of carbon stocks through indirect land use change. However, ILUC, as it is widely modelled, represents the price-induced impact of increasing biomass demand on all those land carbon stocks affected by demand. As Principle 3 seeks to identify and mitigate risks of biomass demand causing changes in carbon stock on a regional basis and makes several references to the use of economic data within the supply base as evidence against the indicators therein, the core principles underpinning ILUC modelling is already built into the proposed Standard revisions. However, future efforts of SBP should seek to better quantify impacts of biomass demand on carbon stocks through utilisation of modelling approaches consistent with the ILUC approach (i.e., econometric modelling).</p>	<p>ILUC is not included.</p>
<p>S1</p> <p>Indicator 2.2.1 (ILUC)</p>	<p>No, there is no value in requiring ILUC in the standard. It is not a knowable thing. There is no reasonable methodology for Organizations sourcing low grade wood from tracts being harvested for higher value products to use in assessing whether their sourcing activities are creating ILUC.</p>	<p>ILUC is not included.</p>
<p>S1</p> <p>Indicator 2.2.1 (ILUC)</p>	<p>There is significant concern regarding the "standalone" document. Without more detail regarding its content, it's difficult to make a judgement on this indicator and guidance.</p>	<p>ILUC is not included.</p>
<p>S1</p> <p>Indicator 2.2.5 (impacts of biomass production on water resources)</p>	<p>I think the suggested guidance should be replaced with the current guidance. Proving the suggested guidance is not realistic given the information currently available on these subjects.</p>	<p>The guidance has been further developed.</p>

<p>S1</p> <p>Indicator 2.2.5 (Impacts of biomass production on water resources)</p>	<p>The ability of a producer, their contractor, or a CB to measure surface run-off or soil and groundwater depletion at the time of harvest, or at a later date during a third-party audit is questionable.</p>	<p>Limitations to due diligence of third parties have been dealt with in section 6.3 of Standard 2.</p>
<p>S1</p> <p>Indicator 2.2.5 (Impacts of biomass production on water resources)</p>	<p>There is significant concern regarding the "standalone" document. Without more detail regarding its content, it's difficult to make a judgement on this indicator and guidance.</p>	<p>In Revision Draft v2, the Impacts – as normative requirements – have been incorporated in Standard 1, whereas the MoV and Sources of Information – as non-normative – will form part of a separate (to be developed) non-normative document.</p>
<p>S1</p> <p>Indicator 2.2.5 (Impacts of biomass production on water resources)</p>	<p>We encourage SBP to engage subject area experts but to be cautious about incorporating indicators that are not appropriate to the level of certificate holder influence. For example, evaluation of groundwater seems inappropriate when the BP does not own the lands it operates in.</p>	<p>Specialists continue to be involved at different levels of decision-making and preparation of Standards content.</p>
<p>S1</p> <p>Indicator 2.2.5 (Impacts of biomass production on water resources)</p>	<p>We encourage SBP to engage subject area experts but to be cautious about incorporating indicators that are not appropriate to the level of certificate holder influence. For example, evaluation of groundwater seems inappropriate when the BP does not own the lands it sources from.</p>	<p>Specialists continue to be involved at different levels of decision-making and preparation of Standards content.</p>
<p>S1</p> <p>Indicator 2.2.5 (Impacts of biomass production on water resources)</p>	<p>We encourage SBP to engage with subject specialist stakeholders.</p>	<p>Specialists continue to be involved at different levels of decision-making and preparation of Standards content.</p>
<p>S1</p> <p>Indicator 2.2.6</p>	<p>I suggest reverting to the current air quality indicator 2.2.7 and its associated guidance.</p>	<p>Working Group A decided not to revert.</p>
<p>S1</p> <p>Indicator 2.2.6</p>	<p>There is significant concern regarding the "standalone" document. Without more detail regarding its content, it's difficult to make a judgement on this indicator and guidance. It should be clarified that if the Organization is not the landowner, this guidance is not an expectation.</p>	<p>In Revision Draft v2, the Impacts – as normative requirements – have been incorporated in Standard 1, whereas the MoV and Sources of Information – as non-normative – will form part of a separate (to be developed) non-normative document.</p>
<p>S1</p> <p>Indicator 2.2.6</p>	<p>This indicator has been significantly expanded to include more than just forest management activities. We are aware of growing stakeholder interest on air quality, however, in the US air quality associated with the biomass producing plant is handled through a rigorous state level permitting process and monitored continuously for compliance with the Clean Air Act and EPA guidance. Need understand the appropriate level of evidence which will be required as evidence for adherence to Standard 1.</p>	<p>No change. Compliance with US Environmental Protection Agency and the US law 'Clean Air Act' is not globally applicable. Impacts and MoV will identify the evidence needed.</p>
<p>S1</p> <p>Indicator 2.2.6</p>	<p>We encourage SBP to engage with subject specialist stakeholders.</p>	<p>Specialists continue to be involved at different levels of decision-making and preparation of Standards content.</p>
<p>S1</p> <p>Indicator 2.2.9</p>	<p>There is significant concern regarding the "standalone" document. Without more detail regarding its content, it's difficult to make a judgement on this indicator and guidance.</p>	<p>In Revision Draft v2, the Impacts – as normative requirements – have been incorporated into Standard 1, whereas the Means of Verification (MoV) and</p>

		Sources of information – as non-normative – will form part of a separate (to be developed), non-normative document.
S1	2.2.10 Much of this guidance is related to or redundant to indicators in 2.1, 2.2.1 and 2.2.2. This indicator should address forest health in a straightforward, traditional manner - i.e., fire, insects, disease. Ecological functions, flood control, succession, etc. are not forest health issues or should be addressed elsewhere in the standard.	Redundancy checks have been done and text was adapted. Further redundancy checks are ongoing.
S1	Indicator 2.2.9 We encourage SBP to engage with subject specialist stakeholders.	Specialists continue to be involved at different levels of decision-making and preparation of Standards content.
S1	Indicator 2.1.1 (HCV) SBP should not adopt the HCV approach (capitalized). Many of the criteria and indicators associated with the HCV/RN are not risk-based and instead refer directly to forest-level management. Biomass producers do not consistently have access to this type of data. The natural capital and biodiversity subgroup has not recommended moving forward with HCV (capitalized).	Working Group A decided to leave HCV/A in guidance as an example for best practice and remove 'should be followed' and keep the need to justify choice of tool; Working Group A suggests SBP to facilitate or undertake Supply Base level HCV assessments using the HCV/RN approach where there is a high risk to their conservation and/or where capacity and tools to do so are otherwise limited or missing.
S1	Indicator 2.1.1 (HCV) SBP should not specifically require the use on the HCV/NRA. The HCV/NRA is a forestland-based standard for use by forest landowners or those with long term forest leases or concessions. The standard does not contain instructions for application outside the use in direct forestland management and there is no clear or proven methodology for use in other procurement systems such as buying wood directly from suppliers who deal directly with landowners. At best it should be held out as a best practice or leave it as currently reference meaning just one of a number of tools an organization could use to determine HCV location and risk	Working Group A decided to leave HCV/A in guidance as an example for best practice and remove 'should be followed' and keep the need to justify choice of tool; Working Group A suggests SBP to facilitate or undertake Supply Base level HCV assessments using the HCV/RN approach where there is a high risk to their conservation and/or where capacity and tools to do so are otherwise limited or missing.
S1	Indicator 2.1.1 (HCV) The concept of HCV's needs a different approach that more closely aligns with the country or region that a company is operating in rather than global concerns or concerns that are managed by governments.	Working Group A decided to leave HCV/A in guidance as an example for best practice and remove 'should be followed' and keep the need to justify choice of tool; Working Group A suggests SBP to facilitate or undertake Supply Base level HCV assessments using the HCV/RN approach where there is a high risk to their conservation and/or where capacity and tools to do so are otherwise limited or missing.
S1	Indicator 2.1.1 (HCV) There is significant concern regarding the "standalone" document. Without more detail regarding its content, it's difficult to make a judgement on this indicator and guidance.	Working Group A decided to leave HCV/A in guidance as an example for best practice and remove 'should be followed' and keep the need to justify choice of tool; Working Group A suggests SBP to facilitate or undertake Supply Base level HCV assessments using the HCV/RN approach where there is a high risk to their conservation and/or where capacity and tools to do so are otherwise limited or missing.
S1	Indicator 2.1.1 (HCV) The HCV approach nor the HCV/RN guidance has not been agreed to or endorsed by the Natural Capital subgroup and in fact has raised some specific concerns. WY does not consider HCV a "best	Working Group A decided to leave HCV/A in guidance as an example for best practice and remove 'should be followed' and keep the need to justify choice of

	<p>practice" and has used alternative approaches (e.g., NatureServe, agency natural heritage data, agency Wildlife Action Plans) successfully in the conservation of at-risk species and communities. This flexibility must be retained. Objections to the HCVRN program has been raised previously and it's disappointing that is again appearing in this draft as a preferred system.</p>	<p>tool. Working Group A suggests SBP to facilitate or undertake Supply Base level HCV assessments using the HCVRN approach where there is a high risk to their conservation and/or where capacity and tools to do so are otherwise limited or missing.</p>
S1	<p>2.1.2 "The organisations shall communicate with suppliers, forest and other operators, and provide them with records of meetings, talks, workshops, etc." This normative statement is unclear as to what is expected of the organization. Suggested change: "Maintenance or improvement of ecosystem services." Suggested change: "...level (e.g., standing..." these are examples of habitat features not "in other words" Suggest: "Avoid the spread of invasive species."</p>	<p>Suggestions taken up in Revision Draft v2.</p>
S1	<p>While we share the view that approaches to biodiversity in the new standards need to be ambitious and recognize the value of HCVRN we caution against alignment with a single approach. This is a very valid approach but selective application of components of the HCV methods are more fit to addressing individual criteria set out in Standards. In addition, there are other methodologies and tools available for certificate holders. Flexibility and acceptance of varied approaches may result in more robust analysis and response. We would also welcome SBP setting out the options and implications in more detail, including specifically of SBP taking an active centralized role in coordinating biodiversity identification and monitoring and sharing this with Biomass Producers.</p>	<p>Working Group A decided to leave HCVA in guidance as an example for best practice and remove 'should be followed' and keep the need to justify choice of tool. Working Group A suggests SBP to facilitate or undertake Supply Base level HCV assessments using the HCVRN approach where there is a high risk to their conservation and/or where capacity and tools to do so are otherwise limited or missing.</p>
S1	<p>Whilst we share the view that approaches to biodiversity in the new standards need to be ambitious and recognise the value of HCVRN we caution against alignment with a single approach. We would welcome SBP setting out the options and implications in more detail, including specifically of SBP taking an active centralised role in co-ordinating biodiversity identification and monitoring and sharing this with Biomass Producers.</p>	<p>Working Group A decided to leave HCVA in guidance as an example for best practice and remove 'should be followed' and keep the need to justify choice of tool. Working Group A suggests SBP to facilitate or undertake Supply Base level HCV assessments using the HCVRN approach where there is a high risk to their conservation and/or where capacity and tools to do so are otherwise limited or missing.</p>
S1	<p>"Forest" Carbon in the landscape... Perhaps the original Criterion was better than these alternatives. there's no definition of "slow growing" and no matter the definition, there will be controversy. High carbon stock areas are already covered in P2, so this is redundant. Allowing the acceptance of stumps and roots in any case will be controversial and damage the credibility of SBP. All the text following "To inform the risk assessment..." would be difficult to audit against (likely impossible) and should be deleted.</p>	<p>Revised and proposed text on carbon in Revision Draft v2 aims to develop a pragmatic but effective way to reduce the risk that biomass has unacceptable associated LULUCF emissions. The formulation is still difficult but less so than the original text.</p>
S1	<p>This principle should refer directly to forest carbon in the landscape.</p>	<p>Working Group A agreed that the criteria should apply to biomass outside the forest and not just within the forest.</p>
S1	<p>Principle 3 (Carbon)</p>	<p>Revised and proposed text on carbon in Revision Draft v2 aims to develop a pragmatic but effective way to reduce the risk that biomass has unacceptable associated LULUCF emissions. The formulation is still difficult but less so than the original text.</p>

		supply base. Suggest that region is more appropriate. - Both are very vague, which makes auditability and implementation difficult or impossible.	
S1	Principle 3 (Carbon)	On 3.1.1 - Suggest that instead of this regional forest carbon assessment, which seems very generic and difficult to audit, that the REDII implementation guidelines for determining carbon impact are followed. REDII guidance requires biomass producer to use a historical reference baseline to make reasonable estimations about what carbon may look like in the future in the sourcing area. The guidance also requires that economic operators develop a verification system, creating a good opportunity for SBP to fill that role.	LULUCF requirements relating to REDII have been incorporated into Revision Draft v2.
S1	Principle 3 (Carbon)	On 3.1.1 contexts - Why are these specific 5 scenarios called out? The list of contexts which seem negative for carbon (but are not always) is endless. Is it necessary to select specific instances that require additional justification?	The issues highlighted were deemed to be the most likely and highest risk.
S1	Principle 3 (Carbon)	On slow growing forest - The carbon work group has been unable to find an acceptable definition of slow-growing forests for 12+ months. This indicates that there is no acceptable definition.	This is challenging; the text has been revised in Revision Draft v2.
S1	Principle 3 (Carbon)	On high carbon stock areas - The real concern is that these areas would be converted away from high-carbon stock because of biomass sourcing – this type of conversion is already prevented by other criteria/indicators, so this seems unnecessary to repeat here.	Working Group A has, in principle, agreed that 'important' issues can be reinforced across different indicators – links to related indicators are made in Revision Draft v2 text.
S1	Principle 3 (Carbon)	On 3.1.1 'consider...'. 'Consider' is a difficult word to audit against. Say an organization considers and decides a carbon estimation is not needed. Is that decision process audited? What if the auditor disagrees?	Forest Carbon Sub-group currently develops additional guidance.
S1	Principle 3 (Carbon)	On 3.1.1 definition of 'conservative' - Clarity is needed on what type of 'action' is appropriate here.	Forest Carbon Sub-group currently develops additional guidance.
S1	Principle 3 (Carbon)	On 3.1.1 reference to standalone guidance - All SFM activities have relevance to forest carbon. Attempting to identify all possible practices and outcomes is an impossible task. Plus, there will always be exceptions to every rule.	The issues highlighted were deemed to be the most likely and highest risk.
S1	Principle 3 (Carbon)	"Principle 3: Carbon in the landscape is maintained or increased" Change to: "Principle 3: Carbon stocks are maintained or increased" Justification: The indicators contain references to factors that will impact changes in carbon stock in solid wood products (i.e., diversion from alternative markets)	Revision Draft v2 text has been amended to read: 'increased or not adversely affected'.

<p>S1</p> <p>Principle 3 (Carbon)</p>	<p>“The organisation shall undertake a risk assessment of the impacts of biomass harvesting on forest carbon within the supply base, to ensure that forest carbon stocks are not adversely affected and uses the assessment to justify feedstock sourcing decisions. The organisation shall provide justification for the time frame applicable to the assessment.” Change to: “The organisation shall undertake a risk assessment of the impacts of biomass harvesting on forest carbon within the supply base, to ensure that forest carbon stocks are not adversely affected compared to a baseline without the BPs demand for biomass sources and uses the assessment to justify feedstock sourcing decisions. The organisation shall provide justification for the time frame applicable to the assessment.”</p> <p>Justification: Preference on ‘adversely affected’ over ‘maintained or increased’ within the indicator as this more easily talks to use of ‘good’ sources of biomass in regions of declining carbon stock - that is where despite declining stocks, the impact of biomass sourcing is beneficial. Further clarity is required on what ‘as a result of sourcing feedstocks’ means in terms of assessing impact on forest carbon stocks. Use of a phrase ‘compared to a baseline’ is valuable in tying the standard to carbon assessments in other policies and standards e.g., LULUCF accounting, carbon verification standards. The assessment should consider impacts on both the forest carbon landscape and solid wood product sector, including consideration of a multitude of factors such as possible alternative fates for feedstocks (including whether the material would be used in alternative markets or otherwise go to waste) and whether there is an economic response within the supply base to increased demand. A quantitative baseline (i.e., estimates of carbon stocks) should only be developed if the biomass cannot be evidenced as being low risk, in line with the recommended indicators.</p>	<p>Revision Draft v2 text has been amended to read: ‘increased or not adversely affected’.</p>
<p>S1</p> <p>Principle 3 (Carbon)</p>	<p>Previous text - “SBP recognises that at some times in some catchments, due to natural forest cycles that may be wholly un-associated with wood for energy, carbon stocks may decline for a period. These declines will be naturally recovered, and carbon stocks will be maintained or increased. Regions where growth<drain. The Organisation must provide justification for the time period to which the assessment applies” Suggested additional text for clarification: “Forest carbon stocks are influenced by a range of anthropogenic and non-anthropogenic factors including management decisions (e.g., planting, harvesting), forest age structure and natural disturbance. Where a decline in forest carbon stock occurs within the supply base (i.e., growth<drain), evidence must be provided that this is not a direct result of increased harvesting for biomass and that management activity will result in a recovery of carbon stocks. The Organisation must provide justification for the time period to which the assessment applies.” Justification: It may be helpful to have a comment that biomass may still be compliant with the standard in regions of decreasing carbon stock – building out the growth/drain requirement. However, it remains important to stress that carbon stocks should be recovered by forest management activity rather than naturally (i.e., non-anthropogenically), as was indicated in the previous standard.</p>	<p>Additional guidance on the issue has been requested from SBP.</p>
<p>S1</p> <p>Principle 3 (Carbon)</p>	<p>“Where there is a direct land use change, the carbon emissions associated with this may need to be calculated” Change to “Where there is a direct land use change, the carbon emissions associated with this shall be calculated” Justification: Direct land use change is a mandatory calculation in RED II. Direct land use change however needs to be clearly defined, paying due regard to definitions in REDII.</p>	<p>Agreed, this was missing, and the requirement has been reinstated.</p>

	<p>5. "Stumps and roots" should not be allowed in any circumstances in order to align to the rules of REDII.</p> <p>6. "Where demand for biomass could lead to diversion of feedstock from long term carbon stores" Change to: "Where demand for biomass could lead to diversion of feedstock from long-lived wood products" Justification: Long term carbon stores is too ambiguous – preference therefore for 'long-lived wood products. SBP should recognise suggested REDII definitions on ineligible sources of roundwood feedstock (e.g., 'quality roundwood', 'industrial roundwood). SBP should take the opportunity to link this criterion to definitions e.g., roundwood that does not divert from long-lived wood products should not be defined as quality roundwood. SBP should make clear that market demand is a critical component of the definition – if there is insufficient demand and harvesting is supportive of maintaining or increasing forest carbon stocks (e.g., forest thinning), physical criteria (e.g., top diameter) are not always a reasonable way to provide eligibility criteria.</p>	<p>Forest Carbon Sub-group currently develops additional guidance.</p> <p>It was felt that the 'carbon stores' terminology allowed more flexibility than 'long-lived wood products'.</p>
S1	<p>Principle 3 (Carbon)</p> <p>3.1.1: I prefer the top option of "as a result of sourcing feedstock, carbon stocks in the supply base are maintained or increased". The alternative wording of "adversely affected" is less clear and begs for a definition.</p> <p>Is the Means of Verification in Standard 2 and the stand-alone document? It's not specified in the indicator. There's no additional sections as in principle 2 (Guidance or Sources of Information to Include".</p> <p>3.1.1 - Prefer the wording "maintained or increased"</p>	<p>Revision Draft v2 text has been amended to read: 'increased or not adversely affected'.</p> <p>There is extensive guidance in the text, which Forest Carbon Sub-group currently checks for comprehensiveness and need for additional guidance.</p>
S1	<p>Principle 3 (Carbon)</p> <p>How is carbon going to be measured and who decides what happens when there is forest fire or other major events that release significant carbon. Who determines when forests turn into carbon sources vs. carbon sinks? This is a very slippery slope that has the potential to create a tremendous amount of confusion.</p>	<p>Forest Carbon Sub-group currently develops additional guidance.</p>
S1	<p>Principle 3 (Carbon)</p> <p>In 3.1 and 3.1.1 prefer "are not adversely impacted" language. Section 3.1.1 might be interpreted to imply that it is acceptable to harvest stumps and roots. In 3.1.1 some of the requirements could require a higher level of sophistication that is currently available through existing CB resources.</p>	<p>Revision Draft v2 text has been amended to read: 'increased or not adversely affected'.</p>
S1	<p>Principle 3 (Carbon)</p> <p>Removal of the suggested MOVs without publication of the draft document they will be contained in makes assessment of the principle difficult. Will the original MOVs still be used?</p>	<p>In Revision Draft v2, the Impacts – as normative requirements – have been incorporated into Standard 1, whereas the Means of Verification (MOV) and Sources of Information – as non-normative – will form part of a separate (to be developed), non-normative document</p>
S1	<p>Principle 3 (Carbon)</p> <p>Some general observations on especially principle 3: The standard (seem to) assume that the end use of the certified material is for electricity and/or heating production. This is currently the case for (almost?) 100% of the certified biomass but may well change over the coming years various initiatives exist to produce e.g., bio-based plastics and chemicals or fuels for heavy duty transport from lignocellulosic biomass. As such, the use could possibly be preferred over other, traditional</p>	<p>Working Group A has been unable to reach a consensus on whether cascading use should be an element of the SBP Standard and if so, how it would be incorporated into a sourcing Standard.</p>

		<p>uses. It would be good to consider/clarify how such decision should be made by an organization in the future under S1 indicator 3.1.1, especially when the end-use is not known. Related to this point, the concepts of cascading and circular (bio-)economy are not explicitly included in the current proposed standard, but are becoming ever more important in the EU, as also reflected in the recent proposals for sustainability criteria for the REDIII. Elements of these principle- avoiding energetic use when a (long-life) material use is otherwise likely are present in the current draft standard but could be more pronounced / stimulating cascading/ high-end use could become an individual principle on its own. An important question for further consideration is also whether only longer-life products should be prioritized overuse for electricity & heat, or also applications with short lifetimes (e.g., packaging). Also biobased plastics (usually considered a high -value use) may have short lifetimes.</p> <p>Principle 3 “Carbon in the landscape is maintained or increased” is a very important and valid principle, but it measures carbon stocks as an absolute value. Critics argue that instead (or also), the change in carbon stocks should be compared relative to a scenario without the harvest of biomass for energy purposes (aka the counterfactual). Compared to the old standard, the new standard addresses this amongst others by stating “the organisation should also ...consider whether there is evidence of dynamic response in the forest to increased economic demand for feedstock, measured over a justifiable period, providing evidence of its impact on carbon”. In my view, this is a key aspect for SBP to maintain/gain wider societal acceptance, and as such, this should be phrased stronger, i.e., not just left to the consideration of an organisation itself. I fully support the call for more guidance, especially to “Develop further robust and extensive guidance for undertaking a forest carbon risk assessment, including how forest carbon is measured and what evidence is acceptable.”</p>	<p>SBP to address in the longer term.</p>
S1	Principle 4 (Biomass benefits people and communities)	<p>Remove text “Sources of information include.... Further guidance is available in the Social Accountability 8000 standard: https://sa-intl.org/programs/sa8000/” Justification: Reference to SA 8000 not required.</p>	<p>No action taken - sources of information are exactly that.</p>
S1	Principle 4 (Biomass benefits people and communities)	<p>“The organisation has implemented appropriate control systems and procedures for verifying that: Feedstock is not supplied using any form of compulsory labour.” Change to: “The organisation has implemented appropriate control systems and procedures for verifying that: Feedstock is not supplied using any form of forced or compulsory labour.” Justification: To align with SA8000 definition of forced and compulsory labour i.e. All work or service that a person has not offered to do voluntarily and is made to do under the threat of punishment or retaliation or that is demanded as a means of repayment of debt.</p>	<p>Revision Draft v2 has been amended to read: “The Organisation has implemented appropriate control systems and procedures for verifying that: Feedstock is not supplied using any form of forced or compulsory labour”.</p>
S1	Principle 4 (Biomass benefits people and communities)	<p>“The organisation has implemented appropriate control systems and procedures for verifying that: Workers are not discriminated against in respect of employment and occupation.” Change to: “The organisation has implemented appropriate control systems and procedures for verifying that: Workers are not discriminated against in respect of employment, occupation, access to training, promotion, termination or retirement based on race, national or territorial or social origin, caste, birth, religion, disability, gender, sexual orientation, family responsibilities, marital status, union membership, political opinions, age or any other condition or characteristics.” Justification: Expanded to provide clarity and align with SA8000.</p>	<p>No change: The proposed indicator level text setting out types of discrimination is currently in the guidance as ‘shall’, that means it is mandatory.</p>

<p>S1</p> <p>Principle 4 (Biomass benefits people and communities)</p>	<p>“Shall ensure that the normal work week, not including overtime, shall be defined by law and shall not exceed 48 hours.” Change to: “Shall ensure that the normal work week, not including overtime, shall not exceed 48 hours (or the maximum regular hours according to local law).” Justification: Ensure the standard aligns to local laws</p>	<p>No change. The guidance already refers to the applicability of and limitation by local law.</p>
<p>S1</p> <p>Principle 4 (Biomass benefits people and communities)</p>	<p>“The organisation has implemented appropriate control systems and procedures for verifying that: workers have adequate access to health care provision • Sickness benefits • Retirement benefits • Invalidity benefits • Death benefits • Workers’ compensation • Are there any others?” Change to: “The organisation has implemented appropriate control systems and procedures for verifying that: workers have adequate access to: - health care provision - Sickness benefits - Retirement benefits - Invalidity benefits - Death benefits - Workers’ compensation - Are there any others?”</p>	<p>The Social Sub-group discussed standards text revision. Revision Drafts v2 has taken this comment into account. Supplier and contractors section has been reviewed. Standard 4 (CoC) also includes more details in Revision Draft v2.</p>
<p>S1</p> <p>Principle 4 (Biomass benefits people and communities)</p>	<p>“Suppliers and contractors should be seen as partners with the organisation rather than providers of goods and services alone. As a result, the organisation: shall ensure that suppliers and contractors rates of pay meet or exceed industry standards and which allow suppliers and contractors to provide benefits to their employees, including but not limited to: - Health care - Sickness benefits - Retirement benefits - Invalidity benefits - Death benefits” *Doesn’t appear to have been completed*</p>	<p>Working Group A decided to edit guidance to include transport: “Contributions to the local economy from feedstock harvesting, biomass production and transportation should be evaluated for positive and negative impacts.”</p>
<p>S1</p> <p>Principle 4 (Biomass benefits people and communities)</p>	<p>“Contributions to the local economy from feedstock harvesting and biomass production should be evaluated for positive and negative impacts.” Change to: “Contributions to the local economy from feedstock harvesting, biomass production and transportation should be evaluated for positive and negative impacts.” Justification: To include transportation aspects and impacts.</p>	<p>No change. Working Group and Secretariat agree that this is acceptable</p>
<p>S1</p> <p>Principle 4 (Biomass benefits people and communities)</p>	<p>As a Standard, this section is much too long. Several indicators can be combined, and guidance can list what are now indicators. For example: compulsory labour, discrimination, child labour and others can be combined under one indicator.</p>	<p>Working Group A recommends that SBP clarifies if it is necessary to do a legal review of Principle 4, possibly as part of piloting the Standards. Working Group A recommends that SBP should consider whether it takes on the role of undertaking reviews of Standard 1 against Supply Base laws where risks are high and/or capacity to do so by Organisations is limited. No change – Risk Assessment requires to review the legislation and see if that alone is sufficient.</p>
<p>S1</p> <p>Principle 4 (Biomass benefits people and communities)</p>	<p>SBP should consider a full legal review of this Principle; putting together a long list of requirements without any stakeholders with legal expertise in the consultation is not a good idea. Many of the indicators may cross the employee v contractor relationship. For instance, the US IFS uses 3 basic categories to determine if the person is an employee or an independent contract: Behavioural Control, Financial Control and the Relationship of the parties. Many of the suggested indicators and associated “normative” guidance seem to cross that line.</p>	<p>In Revision Draft v2, the Impacts – as normative requirements – have been incorporated into Standard 1, whereas the Means of Verification (MOV) and Sources of Information – as non-normative – will form part of a separate (to be developed), non-normative document.</p>

<p>S1</p> <p>Principle 4 (Biomass benefits people and communities)</p>	<p>The indicators and guidance in this Principle should be normalized with the current indicators these are replacing.</p>	<p>Working Group A decided not to change the structure, but to carefully check in the guidance how the replaced structure can be addressed.</p>
<p>S1</p> <p>Principle 4 (Biomass benefits people and communities)</p>	<p>It is not reasonable to expect an organization to do any more than require a supplier or contractor comply with federal, state and local laws and regulations. Placing the phrase, "The Organization, its suppliers and contractors in front of a series of "shall" statements (as found in many of the S1 indicators) is not possible to verify or comply with as an indicator requirement.</p>	<p>Limitations to due diligence have been dealt with in section 6.3 of Standard 2.</p>
<p>S1</p> <p>Principle 4 (Biomass benefits people and communities)</p>	<p>4.1.9 - it is not reasonable to expect an organization to require it suppliers or contractors to take SBP specific training. It is reasonable to expect an organization to procedures in place to ensure SBP indicators are low risk. The indicators and guidance in this Principle should be replaced with the current indicators that are possible for an organization to verify.</p>	<p>Limitations to due diligence have been dealt with in section 6.3 of Standard 2.</p>
<p>S1</p> <p>Principle 4 (Biomass benefits people and communities)</p>	<p>The term "Decent" (as used throughout) with respect to wages is ambiguous and should not be used.</p>	<p>No change - In fact the guidance clearly states what 'decent living wage' incorporates - so it is not ambiguous. Terms also are defined in Glossary.</p>
<p>S1</p> <p>Principle 4 (Biomass benefits people and communities)</p>	<p>In 4.1.1 the language indicates "shall allow workers to freely elect...including where the right to freedom of association...are restricted under law." This seems to imply that a producer should break the law.</p>	<p>Working Group A decided to not change the text.</p>
<p>S1</p> <p>Principle 4 (Biomass benefits people and communities)</p>	<p>In 4.1.2 the language indicating that no costs are borne by the worker is problematic. In certain areas, such as the U.S., it is customary and a legal obligation to withhold certain fees (i.e., taxes) from a worker's compensation.</p>	<p>No change – taxes are not withheld in order to force a person to work.</p>
<p>S1</p> <p>Principle 4 (Biomass benefits people and communities)</p>	<p>There are over 30 pages of requirements in this section. Half of Standard 1 is related to community and labour requirements – this seems out of balance for a feedstock sustainability standard. Further, suppliers are private entities, and it is not appropriate for biomass producers to have control or insight into some internal practices and policies that are included in this principle. There is a line between employee and contractor and the SBP standard must recognize this. The US IRS uses 3 basic categories to determine if a worker is an employee or a contractor, which could be helpful for the process - https://www.irs.gov/newsroom/understanding-employee-vs-contractor-designation</p>	<p>No change - we have a clear steer from the Standards Committee that this is acceptable.</p>
<p>S1</p> <p>Principle 4 (Biomass benefits people and communities)</p>	<p>A thorough legal analysis must be performed before Principle 4 can move forward.</p>	<p>Working Group A recommends that SBP clarifies if it is necessary to do a legal review of Principle 4, possibly as part of piloting the Standards.</p> <p>Working Group A recommends that SBP should consider whether it takes on the role of undertaking reviews of Standard 1 against Supply Base laws where risks are high and/or capacity to do so by Organisations is limited.</p>
<p>S1</p> <p>Indicator 4.2.1</p>	<p>We encourage SBP to engage with subject specialist stakeholders.</p>	<p>Specialists continue to be involved at different levels of decision-making and preparation of Standards content</p>

<p>S1</p> <p>Indicator 4.2.6</p>	<p>We believe that sector alignment with UNDRIP in general (rather than FPIC in particular) is better positioning for biomass. While FPIC is clearly important to some stakeholders, the biomass sector is severely constrained in actually delivering it when the main biomass feedstocks are residuals of others' harvesting operations.</p>	<p>No change - UNDRIP - only covers indigenous people not all affected stakeholders. SBP should undertake a comprehensive gap analysis between different approaches and tools to ensure FPIC, including UNDRIP.</p>
<p>S1</p> <p>Indicator 4.2.6</p>	<p>We believe that sector alignment with UNDRIP in general (rather than FPIC in particular) is better positioning for biomass. While FPIC is clearly important to some stakeholders, the biomass sector is severely constrained in actually delivering it when the main biomass feedstocks are residuals of others' harvesting operations.</p>	<p>No change - UNDRIP - only covers indigenous people not all affected stakeholders. SBP should undertake a comprehensive gap analysis between different approaches and tools to ensure FPIC, including UNDRIP.</p>
<p>S1</p> <p>Indicator 4.1.8</p>	<p>SBP should consider a full legal review of this Principle; putting together a laundry list of requirements without any stakeholders with legal expertise in the consultation is not a good idea. Many of the indicators may cross the employee v contractor relationship. For instance, the US IRS uses 3 basic categories to determine if the person is an employee or an independent contractor: Behavioural Control, Financial Control and the Relationship of the parties. Many of the suggested indicators and associated "normative" guidance seem to cross that line.</p>	<p>Working Group A recommends that SBP clarifies if it is necessary to do a legal review of Principle 4, possibly as part of piloting the Standards.</p> <p>Working Group A recommends that SBP should consider whether it takes on the role of undertaking reviews of Standard 1 against Supply Base laws where risks are high and/or capacity to do so by Organisations is limited.</p>
<p>S1</p> <p>Indicator 4.1.8</p>	<p>Most of the suggested MoV's without publication of the draft document they will be contained in makes assessment of the principle difficult. Will the original MoV's still be used? It is not reasonable to expect an organization to do any more than require a supplier or contractor comply with federal, state and local laws and regulations. Placing the phrase, "The Organization, its suppliers and contractors in front of a series of "shall" statements is not possible to verify or comply with as an indicator requirement.</p>	<p>In Revision Draft v2, the impacts – as normative requirements – have been incorporated into Standard 1, whereas the Means of Verification (MoV) and Sources of Information – as non-normative – will form part of a separate (to be developed), non-normative document</p>
<p>S1</p> <p>Indicator 4.1.8</p>	<p>The list of benefits that is provided for Principle 4 indicators is, in general, too detailed. Is it not sufficient to indicate that the employer must be compliance with all relevant laws in the countries in which they operate? The unusually long and detailed list of requirements might be viewed as socialistic compared to the capitalistic beliefs of some countries.</p>	<p>No change - we have a clear steer from the Standards Committee that this is acceptable.</p>
<p>S1</p> <p>Indicator 4.1.8</p>	<p>We encourage SBP to engage with subject specialist stakeholders.</p>	<p>Specialists continue to be involved at different levels of decision-making and preparation of Standards content</p>
<p>S1</p> <p>No. 2.6 of Explanatory Note</p>	<p>I'm very excited for Principle 5. I envision SBP being able to sponsor studies in regions where there is a social or environmental concern to better quantify the concern and to find key places where pellet mills can make a true difference.</p>	<p>The integration of Principle 5 into the scheme is an ongoing discussion amongst SBP Committees and stakeholders. Whether placed in the Standard itself or elsewhere, the content of 'Principle 5' will be part of the normative SBP system.</p>
<p>S1</p> <p>No. 2.6 of Explanatory Note</p>	<p>Principle 5 does not appear in these drafts. The explanatory note asks stakeholders where this principle should be placed. We suggest it belongs in Standard 1 or in as its own Standard. If it sits outside of the standard, it is unlikely it will be followed.</p>	<p>The integration of Principle 5 into the scheme is an ongoing discussion amongst SBP Committees and stakeholders. Whether placed in the Standard itself or elsewhere, the content of 'Principle 5' will be part of the normative SBP system.</p>

<p>S1</p> <p>No. 2.6 of Explanatory Note</p>	<p>Principle 5 is intended to be in Standard 1 for Organization's to describe the work they are undertaking with others in the forest products industry to address 1 or more of the specified risks identified in the Organizations RA. Most Organizations are a small part of the larger forest products industry and interaction with the industry is the best way to effect change. The concept is not new and is currently used by SFI in its Fibre Sourcing Standard and FSC in its FSC US Controlled Wood National Risk Assessment. Adopting this principle will allow organizations to expand the work they may already be doing, allow SBP to evaluate regions where specific risks are located and launch efforts Organizations can participate into effect change and provide a platform for SBP to describe the impact SBP is having in sustainable sourcing of biomass.</p>	<p>The integration of Principle 5 into the scheme is an ongoing discussion amongst SBP Committees and stakeholders. Whether placed in the Standard itself or elsewhere, the content of 'Principle 5' will be part of the normative SBP system.</p>
<p>S1</p> <p>No. 2.6 of Explanatory Note</p>	<p>The intent of Principle 5 is understood but should not be included in this Standard and should be incorporated elsewhere.</p>	<p>The integration of Principle 5 into the scheme is an ongoing discussion amongst SBP Committees and stakeholders. Whether placed in the Standard itself or elsewhere, the content of 'Principle 5' will be part of the normative SBP system.</p>
<p>S1</p> <p>No. 2.6 of Explanatory Note</p>	<p>We agree with the concepts set out in 'Principle 5'. Principle 5 sets out a realistic way of encouraging positive impacts through sourcing biomass and it provides SBP with vital information on what current regional issues exist and the efforts in place to address them. Principle 5 could inform SBP on how it might engage in to mobilize action of certificate holders and facilitate positive outcomes. Principle 5 is very well-fitted to the risk-based approach because it challenges certificate holders to understand the risks present in the sourcing area and what their influence is on these risks, then challenges them to engage to affect a positive outcome. In many situations it is unrealistic for certificate holders to expect to, independently, demonstrate positive outcomes. Principle 5 recognizes the value of collaborative and industry level efforts that have the potential to influence positive outcomes.</p>	<p>The integration of Principle 5 into the scheme is an ongoing discussion amongst SBP Committees and stakeholders. Whether placed in the Standard itself or elsewhere, the content of 'Principle 5' will be part of the normative SBP system.</p>
<p>S1</p> <p>No. 2.6 of Explanatory Note</p>	<p>We agree with the concepts set out in 'Principle 5'. Principle 5 sets out a realistic way of encouraging positive impacts through sourcing biomass and it provides SBP with vital information on what current regional issues exist and the efforts in place to address them. Principle 5 could inform SBP on how it might engage in to mobilize action of certificate holders and facilitate positive outcomes. Principle 5 is very well-fitted to the risk-based approach because it challenges certificate holders to understand the risks present in the sourcing area and what their influence is on these risks, then challenges them to engage to affect a positive outcome. In many situations it is unrealistic for certificate holders to expect to, independently, demonstrate positive outcomes. Principle 5 recognizes the value of collaborative and industry level efforts that have the potential to influence positive outcomes.</p>	<p>The integration of Principle 5 into the scheme is an ongoing discussion amongst SBP Committees and stakeholders. Whether placed in the Standard itself or elsewhere, the content of 'Principle 5' will be part of the normative SBP system.</p>
<p>S1</p> <p>No. 2.6 of Explanatory Note</p>	<p>[...] recognises the need for SBP to demonstrate positive impacts resulting from biomass sourcing and so strongly supports Principle 5. We believe the principle is well suited to a risk-based approach, providing the necessary flexibility to BPs to identify those areas of sourcing that provide greatest risk within their supply base and respond accordingly with interventions that provide clearly evidenced positive outcomes. We support inclusion of the principle within Standard 1. However, in the event the principle is to sit outside Standard 1, SBP should ensure the principle applies only to BPs.</p>	<p>The integration of Principle 5 into the scheme is an ongoing discussion amongst SBP Committees and stakeholders. Whether placed in the Standard itself or elsewhere, the content of 'Principle 5' will be part of the normative SBP system.</p>

Standard 2 Revision Draft v1: Contributions and Responses

<p>S2</p> <p>General comments: Standard 2 - Feedstock Verification</p>	<p>Concerned with the movement of the SBE to this standard. This has the potential to force companies that didn't have to complete a SBE in the past to do one regardless of the type of feedstock they consume to make their pellets. By doing this does it mean that we now have to be certified to standard 1 as well as standard 2? This coupled with a standalone CoC on top of PEFC makes for confusion and duplication that shouldn't be required.</p>	<p>Working Group A has ensured that Standard 2 now clearly sets out the conditions under which an Organisation has to conduct the different elements of an SBE. It is now clear who is required to do this.</p>
<p>S2</p> <p>General comments: Standard 2 - Feedstock Verification</p>	<p>Generally, not having the separate MoV document available for review with Standard 1 is a bit awkward. There is no clear way for a stakeholder to know if the currently accepted MoV's are still available for use or if MoV's end up being onerous beyond the ability of an organization to meet. The use of "shall" and "must" in the guidance to indicate portions as normative could be confusing. If items are required, then they should be defined as required MoV's. I feel the survey is set up poorly. There should have been text boxes for stakeholders to individually comment on each indicator. Many of the indicators have normative guidance that is not acceptable and there is no way to comment on them.</p>	<p>Working Group A has ensured that in Revision Draft v2, the Impacts – as normative requirements – have been incorporated into Standard 1, whereas the Means of Verification (MoV) and Sources of Information – as non-normative – will form part of a separate (to be developed) non-normative document.</p>
<p>S2</p> <p>General comments: Standard 2 - Feedstock Verification</p>	<p>In general, the use of "Organization" in place of "Biomass Producer" seems unnecessary.</p>	<p>Working Group A has decided that the term Organisation has a wider applicability than Biomass Producer.</p>
<p>S2</p> <p>General comments: Standard 2 - Feedstock Verification</p>	<p>Will there be a 2nd consultation after Means of Verification, the standalone document, and sections D and E are developed? "Risk Management Measures" is used several times. Is this the new terminology for Mitigation Measure?</p>	<p>In Revision Draft v2, the Impacts – as normative requirements – have been incorporated into Standard 1, whereas the Means of Verification (MoV) and Sources of Information – as non-normative – will form part of a separate (to be developed) non-normative document.</p>
<p>S2</p> <p>Step 1 - Supply Base Definition and Mapping</p>	<p>In 1.1.1, what is the definition of Place of Harvesting for secondary fibre?</p>	<p>The definition is now in the Glossary.</p>
<p>S2</p> <p>Step 1 - Supply Base Definition and Mapping</p>	<p>No comments other than the 1.1.8 response.</p>	<p>No response required.</p>
<p>S2</p> <p>Step 1 - Supply Base Definition and Mapping</p>	<p>Sub-scopes should not be required. It is up to the Organization to determine how to structure its RA and if sub-scopes are needed. But if an organization does use sub-scopes, they should be able to include a description of risk levels and when required mitigation management in a single RA rather than a separate one for each sub-scope.</p>	<p>Working Group A agreed and has clarified in Standard 2 that sub-scopes can be dealt with via annexes to a single report, rather than standalone reports for each sub-scope. These annexes need to set out the relevant differences in each sub-scope.</p>

<p>S2</p> <p>Step 2 - Traceability to the Supply Base</p>	<p>In tracking the place of harvest of "All" Feedstock instead of "Primary" Feedstock (only), the concern is that the secondary & tertiary Feedstock will be difficult to track.</p>	<p>Working Group A agrees, however, the risks associated with secondary and tertiary feedstocks require them to be traceable. Although difficult, evidence suggests that it is not impossible.</p>
<p>S2</p> <p>Step3 - Supply Base Evaluation</p>	<p>Should a SBE be mandatory for all producers in the absence of an approved RRA? In 3.0 it appears to be optional but in 3.1 it appears to be mandatory.</p>	<p>The text makes it clear which elements of an SBE are required under which conditions.</p>
<p>S2</p> <p>Step3 - Supply Base Evaluation</p>	<p>In general, trees within a forest are typically managed under a formal management plan. Is this also true for trees outside of a forest? Also, is a risk assessment required for trees in a supply basin that are outside of forests, even though the producer does not intend to source non-forest trees?</p>	<p>No change made. It is clear from the text that an SBE and, therefore, risk assessment is only required for feedstocks being sourced. The SBE/risk assessment will not cover types of feedstock that are not being sourced.</p>
<p>S2</p> <p>Step5 - Developing Supply Base Verifiers</p>	<p>"Document X" is mentioned a few times. Is this the "New standalone document"?</p>	<p>'Document X' referred to the Impacts and MoV document, which has now been split between Standard 1 (Impacts, normative) and an MoV and sources of information guidance document (non-normative).</p>
<p>S2</p> <p>Step5 - Developing Supply Base Verifiers</p>	<p>Generally, not having the separate MoV document available for review with Standard 1 is a bit awkward. There is no clear way for a stakeholder to know if the currently accepted MoV's are still available for use or if MoV's end up being onerous beyond the ability of an organization to meet.</p>	<p>Working Group A agreed. In Revision Draft v2, the Impacts – as normative requirements – have been incorporated into Standard 1, whereas the Means of Verification (MoV) and sources of information – as non-normative – will form part of a separate (to be developed) non-normative document.</p>
<p>S2</p> <p>Step6 - Risk Assessment</p>	<p>6.3 "require their current and potential suppliers and contractors to assess the risk and compliance with the standard with any other organizations that they sub-contract or source from" I'm not sure what this would entail from the supplier. It looks like a difficult ask for suppliers to comply with.</p>	<p>Working Group A has substantially revised section 6.3 to deal with concerns about the legality of placing requirements on third parties.</p>
<p>S2</p> <p>Step6 - Risk Assessment</p>	<p>6.3 An Organization should only be required to ensure their suppliers agree to conform to federal, state and local law. SBP should consider a full legal review of this section, putting together a list of requirements without any stakeholders with legal expertise in the consultation is not a good idea. Some of the requirements may cross the employee v contractor relationship. For instance, the US IRS uses 3 basic categories to determine if the person is an employee or an independent contract: Behavioural Control, Financial Control and the Relationship of the parties. It is possible the 3 bulleted items deemed (shall) "normative" guidance seem to cross that line.</p>	<p>Working Group A has revised section 6.3 to eliminate this risk.</p>
<p>S2</p> <p>Step6 - Risk Assessment</p>	<p>I do think that the criteria and indicators are in theory adequate to assure that the principles are achieved but assuring compliance with these criteria is mainly dealt with through ex-ante risk assessment and management. Recent criticism by NGO's focusses on (alleged) examples of non-compliance of certified biomass. Especially as SBP is also largely relying on systems such as FSC and PEFC, more thought in Standard 2 could be given to if & how claims made by external stakeholders of non-compliance could be investigated & dealt with better, next to the ex-ante risk assessment and management. This goes beyond the SBP standards revision but touches upon the general robustness and effectiveness of certification systems.</p>	<p>Working Group A agreed, however, this was deemed to be beyond the scope of the Standards Development Process. Working Group A has recommended that SBP explore the need for a code of conduct and complaints system.</p>
<p>S2</p> <p>Step6 - Risk Assessment</p>	<p>6.3 - The onus of risk assessment should be on the organization/certificate holders. It is the responsibility of the certificate holder to assess whether their suppliers pose a risk and determine how to mitigate or avoid that risk. The language here places the onus on the suppliers and contractors - this is not something that the certificate</p>	<p>Working Group A has revised section 6.3 to take account of the limits of what can be required of third parties.</p>

		holder can require of a supplier, and it could interfere with the business relationship in place between buyers and suppliers. FSC and PEFC do not require this. Please refer to [...] comments in Standard 1 regarding the appropriate relationship between an employer and a contractor/supplier.	
S2	Step8 - Stakeholder Engagement	In the event that current recognize themes are not accepted in the new standard. It will increase the auditing/cause double auditing and increase cost.	The decision to revise how other standards are recognised by SBP was not within the scope of the Standards Development Process.
S2	Step8 - Stakeholder Engagement	Other schemes require the CB to conduct a single consultation. Was this considered, and if not, what is the rationale for requiring multiple consultations? The CBs always conduct their own consultation regardless of the consultation conducted by the producers.	Stakeholder engagement is a key part of ensuring license to operate and it is therefore important for Organisations to engage in stakeholder consultations rather than defer it to their Certification Bodies. Consultation is required on a range of issues – but not necessarily over a range of different time periods.

Standard 3 Revision Draft v1: Contributions and Responses

	Section Description	Comment	Response
S3	1. Eligibility requirements	Change to "...and an accreditation issued by SBP's designated accreditations assurance provider." The name of an individual provider should not become part of a standard as this is subject to change.	Working Group B/C decided to remove the reference to ASI.
S3	1. Eligibility requirements	If with the new SBP standards SBP own methods for COC are used, SBP is not referring to other scheme management systems in relation to the claim establishing systems then why the CAB has to be still accredited for one of the above schemes in order to be able to be SBP accredited. Anyway, the whole process of SBP accreditation in its framework does not refer so much to FSC and PEFC anymore as it used to be in the previous version of the standard 3.	Working Group B/C agreed to maintain the requirements for Certification Body accreditation and auditor qualification to FSC, PEFC and/or SFI, to serve as an indicator of competence of the Certification Body and the auditor respectively.
S3	4.1.3 Competence of personnel	No comment can be made as ISO 17021-1:2015 Annex A is not included to reference the knowledge and skills that a certification body should have for specific functions. This would be useful. 4.1.4 - No Annex B or C included on which to comment, this would be useful.	Working Group B/C decided to remove references to Annexes.
S3	4.1.1. Competence of personnel	In section 4.1.1, it is important that the CB have sufficient resources to manage the scheme and respond to BPs in a timely manner. Timeliness has been an issue in the past and has caused serious problems.	Working Group B/C ensured that this is addressed. See section 4.1 of Revision Draft v2.
S3	4.2.3 Personnel involved in the certification activities	No comment can be made as ISO 17021-1:2015 Annex A is not included to reference the knowledge and skills that a certification body should have for specific functions. This would be useful. 4.1.4 - No Annex B or C included on which to comment, this would be useful.	Working Group B/C decided to remove references to Annexes.

S3	4.3.2 Auditors	Propose that tertiary education in forest and/or other natural resource management is required, therefore propose changing text for: For qualification to audit SBP Standard 1 and Instruction Document 2D, auditors shall have a tertiary education in qualification in forest and/or other natural resource management.	Working Group B/C decided to revise the text. See section 5.2 of Revision Draft v2.
S3	4.3.9 Auditors	Would place an extreme burden on CBs. We have auditors in markets that only have a single SBP certificate. This would severely increase the costs of audits since they would have to be serviced from abroad.	Working Group B/C decided to maintain this requirement for the second public consultation, to gather additional insight in this topic.
S3	4.3 Auditors	Here also if SBP specifies own qualification requirements then why still to refer to FSC or PEFC. If the lead auditor is PEFC qualified and the SBP certificate holder is FSC certified, then how this PEFC qualification is useful during the audit of such SBP certificate holder. Also, if standard 4 is now not linked so much with FSC and PEFC then only for standard 1,2 this kind of qualification is useful. Maybe also for assessing traders with 4 and 5 no FSC or PEFC COC qualification is needed because SBP sets own set of requirements here?	Working Group B/C decided to maintain the requirements for Certification Body accreditation and auditor qualification to FSC, PEFC and/or SFI, to serve as an indicator of competence of the Certification Body and the auditor respectively.
S3	4.3 Auditors	Requiring at least 3 SBP audits per year per auditor could be difficult, especially for auditors located in places with a limited number of SBP certificate holders.	Working Group B/C decided to maintain this requirement for the second public consultation.
S3	5.10 Peer review	How will SBP ensure that SBP-approved peer reviewers complete reviews in a timely manner? If we have no choice but to use people that SBP has selected, we must have some reasonable expectations of peer reviewers.	See revised section 10.8 of Revision Draft v2 - requirement for Certification Body to provide clear terms of reference including expected response times/timelines.
S3	5.11 Requirements for certified organisation certificates	If the CH is certified as both a BP and a Trader, both designations will appear on the certificate.	No response required.
S3	5.13 Surveillance	In a post-COVID world, remote audits are likely to remain necessary to control carbon emissions and reduce risks associated with the dissemination of pathogens. SBP should consider permanent options for remote audits.	Section 12.14 of Revision Draft v2 defines requirements for remote audits for Standards 4, 5 and 6.
S3	5.13 Surveillance	Remote audits are likely to remain a useful tool in a post-COVID world (if we are even able to get there). Remote audits should still be allowed in certain circumstances, especially since pellet mill processes rarely change between audits.	Section 12.14 of Revision Draft v2 includes conditions for remote audits, for Standards 4, 5 and 6 only.
S3	5.14 Changes affecting certification	The CB is to be notified in advance of material changes in production processes of feedstocks to determine if an interim audit is required.	See revised section 2.1d of Revision Draft v2 (client to notify Certification Body of changes), and section 12.1h (Certification Bodies to consider changes when determining the timing of surveillance audits.
S3	5.5.14 Determining audit time	first sentence is a fragment. It currently has no premise.	Working Group B/C decided to add "The" at beginning of the sentence.

S3	5.5.8 Determining audit time	Suggest adding as a subsection of 5.5.7.5.5.15 - Propose amend to: Selection of the actual FMUs and/or suppliers to audit shall be justified in the audit report, OR shall be random, or be carried out according to a sampling plan with no significant bias.	Working Group B/C decided to revise the text. See section 6.20 of Revision Draft v2.
S3	5.5 Determining audit time	IF CB is to determine on its own the sampling program, then there is a risk that different CBS will have different sampling programs for the same processes and that may lead to differences in evaluation scrutiny. Also, in this case then ASI will decide on their own which sampling program or audit time is sufficient or not between different CBS which will not be objective and fair. Some CBS having more robust systems may be losing clients who will be transferring to other CBS who may have weaker or less demanding sampling programme so until SBP puts clear requirements for all in this matter the risk of various approaches may appear	Working Group B/C is still in the process of considering how to calibrate this or make the intended outcome clearer for consistent interpretation and implementation.
S3	5.6.7 Initial and re-evaluations	which scheme? Any scheme? This could hypothetically cover schemes outside of SBP's or an AB's purview. Clarify.	This is a REDII requirement.
S3	5.6 Initial and re-evaluations	That is good that CBS do not have to do stakeholder consultations for all kind of bps also those without SBE as it is up to now.	No response required.
S3	5.7.5 Non-conformities	Since observations are optional and not every CB issues them, the second sentence should read: Such issues may be recorded in the main evaluation or surveillance audit report as 'observations' for the benefit of the client.	Section on non-conformances was comprehensively revised, see Revision Draft v2, sections 8.1 to 8.10.
S3	5.7.5 Non-conformities	the issuance of Observations is optional in most schemes. Requiring the issuance of Observations could go against some CB's internal systems. Suggest using "may" instead of "shall".	See above.
S3	5.8.3 Reporting requirements	the user guide already no longer matches 100% what is detailed in the audit portal. The audit portal should prevail and SBP should have internal procedures for communicating changes. Otherwise, if the guide tells CBS to do something that is no longer possible in the Portal or differs slightly, ASI will assign non-conformities that are impossible to close without action from SBP.	Working Group B/C agreed to revise the text to reference the Audit Portal rather than the User Guide (section 9).
S3	5.8.4 Reporting requirements	the Portal User Guide already is out of date considering how much the content of the Portal has been updated. Suggest specifying the contents of the Portal report template. Otherwise, this could create lots of conflicting advice.	Working Group B/C agreed to revise the text to reference the Audit Portal rather than the User Guide (section 9).
S3	5.8 Reporting requirements	It is very important that all comments from consultations conducted by a CB be shared verbatim with a BP. The identity of the person making the comment can remain confidential. Some CBS refuse to do this and only provide a generalized indication of the nature of the feedback.	The revised Standards foresee the implementation and set-up of a consultation database, which will facilitate the communication and share of information. See sections 7.8 to 7.12.
S3	Annex. Certificate transfers	If all NCRs now have to be uploaded to the Portal, are the steps to inform the new CB of existing NCRs even necessary? Isn't this something that can now be controlled in the Portal?	The Annex on Certificate Transfers is still in process of revision. The comment will be considered carefully.

S3	Annex. Certificate transfers 1.1.10	If a CB withdraws from participation in SBP through no fault of the BP, why is a full audit required? Should a full audit be required after review by the Secretariat? This is time-consuming and costly to a BP.	The requirement is applicable to a Certificate Holder requesting a transfer. It is not applicable when a Certification Body withdraws from offering SBP certification services. The Annex on Certificate Transfers is still in process of revision. The comment will be considered carefully.
S3	B. Introduction and C. Objective	It should be made clear that SBP is a risk-based scheme.	This comment has been shared with all Working Groups. The introduction texts of all Standards have been revised for improved clarity on this.
S3	D. Scope	A valid concern that several CBs will have been if simply demonstrating evidence of ISO 17065 accreditation is sufficient to demonstrate compliance to the indicators referenced in this standard. Since a CB may use an accreditation body other than ASI for this accreditation, it should be made clear that demonstrating valid accreditation is enough evidence to demonstrate conformance to the ISO 17065 indicators cited here. That is, a CB should not have to open up its PEFC, SFI, ISO 17065 or other non-ASI-accredited schemes up to ASI.	Section 1.1 of Revision Draft v2 should now be clear that the accreditation body would be assessing whether or not the Certification Body holds accreditation to ISO 17065 in accordance with SBPs contractual and scope requirements, and not evaluating conformance with each clause of 17065.
S3	General feedback	The CB should be required to immediately inform their clients in the event they receive Major NCs from SBPs designated assurance manager.	Section 8 on non-conformances has been reviewed and added further clarity on the issue, status, communication and consequences of non-conformances.

Standard 4 Revision Draft v1: Contributions and Responses

	Section Description	Comment	Response
S4	B. Introduction:	"The SBP framework is made publicly available...."	Working Group B/C agrees.
S4	General feedback	All defined terms should be moved into the SBP Glossary to avoid confusion. There are several requirements for other SBP standards cited in ST 4, such as ST 2 and ST 5. These indicators tend to be related to the management system and all should be moved to ST 2.	The Working Groups decided to move all terms and definitions into a separate Glossary.
S4	General feedback	As I understood there will be a finalization of this standard this summer and a new SBP CoC document shall additionally appear in the SBP Policy of BP. This new procedure will be coordinated by an additional instruction to the standard. Right?	The Standards Development Process aims to conclude by end of 2021, with the approval and publication of the Standards. Revision Draft v2 (page ii) contains the details of the effective date and transition period. The Working Groups have recommended that SBP provides sufficient guidance on the revised Standards, to support the transition to the application of the revised Standards.

<p>S4</p> <p>Traceability requirements / 3.2. Material accounting: feedback</p>	<p>Balancing period 12 months is not acceptable. Pellets are a seasonal product, and a 12-month period will cause situation that material which is bought in summertime must be removed from balance next summer. SBP must hold to 24-month period as FSC. This makes most sense when you are working with seasonal product.</p>	<p>Working Group B/C discussed and agreed on a 12-month balancing period. For details see Revision Draft v2.</p>
<p>S4</p> <p>A. Summary of Changes: feedback</p>	<p>Good that this is finally clear so that SBP has own set of requirements and does not have to rely of FSC or PEFC certificates for BP.</p>	<p>No response required.</p>
<p>S4</p> <p>Traceability requirements / 3.1.1 Input / purchasing: feedback</p>	<p>Which ones and how much (how far from receiving point) transport documents must be as reference, please define. Must this reference be included in Invoice? Is it not enough that in transport documents (themselves) is reference of certification status?</p>	<p>The Working Groups have recommended that SBP develops guidance on CoC documentation requirements. For details see Revision Draft v2.</p>
<p>S4</p> <p>Organisational requirements / 1.3.1 Training and qualifications: feedback</p>	<p>is unnecessary to prove implementation of an effective training program. It simply adds another layer of requirements for little benefit. Suggest removal. This is also a management system requirement and should be in ST 2.</p>	<p>The text in the Standard has been amended. For details see Revision Draft v2.</p>
<p>S4</p> <p>Organisational Requirements / 1.1. Requirements: feedback</p>	<p>It is good</p>	<p>No response required.</p>
<p>S4</p> <p>General feedback</p>	<p>It is necessary to publish the documents of the standard in Russian on the official page. We need training lectures in Russian.</p>	<p>The Working Groups have recommended that SBP provides training and translations of the revised Standards in different languages, including Russian.</p>
<p>S4</p> <p>Traceability requirements / 3.2.6 Material accounting: feedback</p>	<p>Needs far greater refinement. As it is unclear what a mass balance material account entails and what systems are allowable e.g., proportionate, non-proportionate (first-in/first-out), non-proportionate (allocated). Needs a statement that sustainability characteristics need to remain attached and should not be swapped between batches. This is in 5E, but it is such a critical aspect of mass balance it deserves to be in the Standards. Clarification should also be provided on what these characteristics are. 3.2.7.1. Should also include similar feedstock type. 3.2.7.2/3.2.7.5 On the basis that a robust mass balance system requires 'dynamic data' to either be applied to all transactions, or none, suppliers will likely adopt the 'balancing period' approach to afford sufficient flexibility in selling material to those markets in which it meets the necessary regulations; a continuously rolling account would reduce the amount of available 'credits' to that which is physically available within stocks on the basis all material should be allocated batch-specific data which will need attributing to each transaction. However, a 3-month period is likely to be overly constricting given a) feedstock heterogeneity and b) different member state requirements and will ultimately lead to inefficient market operation, increasing both costs and emissions (e.g., due to lower capacity vessels, additional shipping movements). A 12-month balancing period should therefore be</p>	<p>The topics were discussed in detail in Working Group B/C and the relevant Sub-groups. The text in the Standard has been amended; the mass balancing section is now far more detailed in Revision Draft v2. A 12-month balancing period has been agreed. For details see Revision Draft v2.</p>

		considered to allow greater flexibility within the supply chain. However, SBP should consider a limit on the extent to which any account may go negative (e.g., 50,000t or 10% of throughput/output), to ensure BPs do not take on an unreasonable level of risk to balancing accounts.	
S4	A. Summary of Changes: feedback	Please note that REDII is largely not applicable for [for our company]	The revised Standards will meet regulatory requirements, such as REDII, most likely by applying additional Instruction Documents for specific frameworks, as currently done, for example, in case of Dutch requirements. Discussions on details are ongoing and following current EU developments on REDII implementation clarifications.
S4	Traceability requirements / 3.2. Material accounting: feedback	REDII makes no reference to such period. Also, why should SBP take only REDII as benchmark for this standard? Why would you have REDII specific requirements but not for example BE or NL specific regulations in here? Why is there a max balance period of 3 months? we always use 12 months and that is also what our national requirements are. We do not want only 3 months for this.	Working Group B/C agreed a 12-month balancing period, see Revision Draft v2. Ensuring REDII compliance will follow the same route as ensuring compliance with BE, NL, and other specific regulations.
S4	Organisational requirements / 1.5. Record keeping feedback	Rewording of NOTE: The extent of the internal audit may depend on the size and scope of the organisation and certificate, and the results from previous internal and external audits. This is also a management system requirement and should be in ST 2.	Working Group B/C agreed to revise the text. For details see Revision Draft v2.
S4	Organisational requirements / 1.7. Non-conforming product or document: feedback	SBP should provide further clarification on how this applies to end users and what end users would be required to do in the event of accepting non-conforming product.	Working Group B/C supports the development of further guidance.
S4	Organisational requirements / 1.6. Stakeholder engagement: feedback	Section 1.6 Stakeholder Engagement - We do not agree with placing this in Standard 4. Currently, the stakeholder consultation requirement is associated with the Supply Base Evaluation and the benchmarking of risks and mitigations – this is the appropriate level. Placing it here in the CoC standard will obligate not only biomass producers, but also traders and end-users to develop detailed stakeholder engagement plans. This placement, combined with increasing the level of detail required, will be difficult to manage appropriately at this scale. We recommend removing this from Standard 4 and having a further discussion about the most appropriate placement for these requirements.	Working Group B/C discussed and agreed to add further, significant details on the Stakeholder Engagement Plan and its scope. A link to Standard 2 has been added, allowing Organisations to refer to the requirements in that Standard.
S4	General feedback	Section 4.2.1 related to subcontractors - Does this include port operations? If so, we do not support this. Section 4.2.3 related to subcontractors - Does this mean that a CB will need to provide approval prior to a biomass producer engaging with a new subcontractor? What is the purpose of this? This doesn't seem necessary and could cause delays in production and shipping.	Working Group B/C refined the section on sub-contractors significantly, while considering good practice examples, e.g., FSC Standard 40-004. Detailed questions still need further discussion and are under development.
S4	Traceability requirements / 3.2.	Section 3.2.7.2 and Section 3.2.7.5 related to mass balancing - The draft REDII operational guidance that was released by the European Commission at the end of March does not include the 3-month balance period that was	Working Group B/C agreed a 12-month balancing period in Revision Draft v2. See comments above on REDII-compliance scope.

<p>Material accounting: feedback</p>	<p>suggested by Navigant/REDIIIBIO project. The draft references directly back to the original REDII language, which does not include any fixed balancing time period. Our understanding is that this was written into this SBP revision draft to satisfy the potential gap between REDII and SBP but given that that gap has not come to bear, this should be removed. As we and other stakeholders advocating during the REDIIIBIO process, the balance period of 3 months overly prescriptive and is not in keeping with current industry and supply chain standards and best practices. The 3-month time frame was put in place several years ago for the EU biofuels sector and it created significant administrative burden which resulted in severe disruption of the market. We should not repeat that mistake.</p>	
<p>S4 Additional requirements / 4.1. Business integrity, social, health and safety and environmental requirements for all certificated organisations: feedback</p>	<p>Section 4.1. It is helpful to see this comment ". The sub-group recommends focusing on high-risk jurisdictions and activities and limiting burden on low risk highly regulated jurisdictions." However, it would be useful if the standard could clarify to what extent the auditor will be able to rely on existing controls, rather than replicating work already completed for other purposes.</p>	<p>Section on business integrity was comprehensively revised (see Section 4.1 to 4.5), including setting a link to Standard 1, Criterion 4.1, while considering good practice examples in requirements setting, e.g., FSC Standard 40-004.</p>
<p>S4 Additional requirements / 4.2. Sub-contractors: feedback</p>	<p>There is a lack of clarity on who in the supply chain these requirements apply to and how they will impact the biomass producer's/certificate holder's relationship with their subcontractors. We recommend revisiting this section to ensure the impacts are well-understood. We do not support moving forward with this language until more clarity is provided. Section 4.2.1 related to subcontractors - Does this include port operations? If so, we do not support this. Section 4.2.3 related to subcontractors - Does this mean that a CB will need to provide approval prior to a biomass producer engaging with a new subcontractor? What is the purpose of this? This doesn't seem necessary and could cause delays in production and shipping.</p>	<p>Working Group B/C refined the section on sub-contractors significantly, while considering good practice examples, e.g., FSC Standard 40-004. Detailed questions still need further discussion and are under development.</p>
<p>S4 General feedback</p>	<p>The current standard omits functional requirements, notably how mass balance systems will be operated under the SBP CoC. For instance, there is no description in the Standard of credit accounts or mass balance systems (e.g., proportionate/non-proportionate). There is only a brief mention of some of the components of these systems (e.g., balancing period). Far greater detail is therefore required on how these systems are to be operated. Currently there are multiple mechanisms for maintaining and passing on sustainability data: -SAR (feedstock data; energy & carbon data) -DTS (pellet plant of origin/reporting period; feedstock data) -Credit accounts (claims; feedstock data) The mass balance systems that arise are convoluted on the basis some information is passed on by the BP (e.g. pellet plant; dynamic feedstock data) and some is calculated/inferred by the end user (e.g. GHG intensity; feedstock data, where not provided dynamically). Equally, some information is passed on for some trades of a BP, but not others (e.g., dynamic data). This has resulted in a mix of proportionate and non-proportionate mass balance systems functioning throughout the chain of custody for different sustainability characteristics. As it stands, Standard 4 does not appear to address these inconsistencies, which risks undermining the overall integrity of the whole system mass balance. For instance, where a BP sources a mix of roundwood and sawmill residues and provides dynamic data for the sawmill residues only, customers that receive the roundwood will be unclear as to whether they are receiving a mix of roundwood and sawmill residues, or roundwood only. Ultimately, a single, consistent mass balance approach should be required for all sustainability information to be</p>	<p>Working Group B/C and relevant Sub-group discussed the comments in detail and updated the Mass Balance section. See revision Draft v2.</p>

	<p>passed on throughout the chain of custody, importantly covering claims, pellet plant of origin and feedstock type i.e. each time a transaction is made, the claim, the pellet plant of origin and any relevant batch-specific data (considered here as information listed in the feedstock table of the SAR e.g. feedstock type, country of origin, and any connected information e.g. GHG intensity) should be passed on, with this information maintained within a single mass balance register. A critical component of this, is that the provision of batch-specific data by a CH should never be voluntary on a trade-by-trade basis, else it risks disrupting the overall mass balance. Either additional batch-specific data should be provided to all customers of a CH, or to none. An exception to this is where the CH adopts the transfer system, such that information is passed on exactly as it is received. For organisations not intending to meet REDII requirements, should there be different credit accounting requirements than 3.2.7.5? It is reasonable that the Standard allows different mass balance approaches, provided that CHs adopt a single, consistent approach to mass balancing. Importantly, CHs should not have multiple systems in place, one for passing on REDII claims and one for supplying other markets. It is equally critical than under the operation of any system, passing on of any additional batch-specific 'dynamic' data is either provided with all trades made by a BP, or on no trades. I.e., the organisation either adopts a proportionate mass balance approach to batch data (e.g., no dynamic data, whereby all customers determine batch-specific data via the SAR by proportional allocation against all feedstock groups) or non-proportionate approach (dynamic data). These different approaches should be described in the Standard or accompanying guidance. For so long as provision of certain data on trades remains optional (e.g., feedstock category, country etc.), it creates an inconsistent mass balance, on the basis that customers of sales made without the optional data will have to make assumptions on sustainability information relating to the trade and will fail to account for that information passed on with the additional data. For instance, a BP sources biomass from Latvia and Estonia. The BP sells a REDII-compliant claim, for all material from Estonia. The remaining biomass is then sold without a RED-II compliant claim. The customer of the latter trade now needs to make an assumption on which country the material originates. Without access to the BPs other trades, they will likely make the assumption the biomass is a mix of Latvian and Estonian biomass, based on the best available information in the relevant SARs for the biomass. Key components of the mass balance approach adopted by SPP: A mass-balancing 'dynamic data' system should be fit for purpose in all end markets, and not tailored to any one market in particular (e.g. current IDSD rules are targeted towards the Dutch market by keeping credit accounts for 'categories' of feedstock, where definitions align to Dutch requirements) The mass balance system should be kept flexible, allowing the BP to aggregate feedstock groups and other batch-specific data in a way that meets the needs of their customers. However, at a minimum, separate credit accounts should be kept for: -Pellet plant of origin -Primary material and secondary/tertiary material -Material certified through a supply base report, material certified through FMI certification These accounts must be combined, ensuring all characteristics remain attached, and should not be operated in parallel (i.e., one account for pellet plant, one account for feedstock etc.) Credit accounts should be identified using unique identifiers, providing mutual exclusivity across accounts. Ideally, these would be integrated with current batch codes (acting as identifiers of the credit/mass balance account) to form a single mass balance process. Ideally, this mass balance would be controlled via the DTS, with unique batch codes used to identify and transfer all pertinent sustainability data, as aggregated by the BP e.g., not just pellet plant of origin, reporting year and distribution route (as is currently identified in the batch code) but also e.g., feedstock type, country of origin. The most logical approach would be to connect feedstock groups in the SAR to batch codes, while allowing multiple feedstock groups to carry the same batch code, as aggregated in a way the BP sees fit but meeting the minimum requirements outlined above. E.g., all sawmill residue lines in the feedstock table could be aggregated to a single batch, and all primary material another batch. The Standard should also describe how credit accounts should be operated on the basis this is now a stand-alone Standard and no longer reliant on other COC standards.</p>	
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S4	General feedback	<p>The draft revised documents and the suggested applicability and associated claims retain the flaws of the present standards, in that they refer to SBP providing assurance related to biomass production, but not the economically, environmentally and socially responsible biomass use that SBP states as its purpose. As such any errors of detail in the present standard or revised draft are dwarfed by errors of omission related to applicability to end users, certification of biomass use, and claims that certified end users might make.</p>
S4	General feedback	<p>Things in a standard need to be clear and not lead to discussions!</p>
S4	<p>Organisational requirements / 1.6. Stakeholder engagement: feedback</p>	<p>This is a significant change that has not been thoroughly considered by participants in the revision process. The stakeholder consultation requirement currently exists in association with Standard 1 and the SBE. It is surprising to see it included in the chain-of-custody standard. Will this be in addition to the stakeholder consultation requirement associated with the SBE? There are several issues with this approach. First, by placing it in Standard 4 it infers those end-users and trader will be obligated to try to engage regional stakeholders from their respective supply areas to whom they are not familiar with. It seems highly unrealistic that this method would effectively identify, and address concerns associated with biomass sourcing. Second, the level of effort and detail that is proposed, even for biomass producers, is a reach, something SBP has experienced first-hand in the Standard revision process. Engaging diverse stakeholders can be extremely difficult. To place a requirement that includes audit of stakeholder engagement success (i.e., verification of participation records and meeting frequency) is predispousing certificate holders to non-conformances related to stakeholder participation which are not entirely within their control. However, the concept of SBP creating a system to collect and share stakeholder concerns is valid and may be helpful. It is possible for biomass producers to engage with industry peers, experts, professionals, and NGOs, outside of a formal stakeholder engagement process, to develop robust sourcing protocols. This is occurring and is documented and audited through the Standard 1 and through third-party Forest Management certifications. Overemphasising stakeholder engagement has the potential to impose unnecessary burden on the certificate holders without producing tangible sustainability benefits. Suggestion is to not include the current approach in Standard and to open this topic up for wider discussion prior to finalizing SBPs approach to stakeholder engagement.</p>
S4	<p>Organisational requirements / 1.6. Stakeholder engagement: feedback</p>	<p>This is totally unacceptable. Why is this needed? The most part of Stakeholders find existing consultations as encumbrance, this will be even worse.</p>
S4	<p>Organisational requirements / 1.6. Stakeholder engagement: feedback</p>	<p>What does this topic have to do with COC? This should be placed in Standard 2 because it relates to management system.</p>

Working Group B/C does not agree with this statement. Standard 1 sets requirements for social, environmental and economic responsibility, targeting Biomass Producers and the supply bases they source feedstock from. Standard 4 sets requirements for operators in the supply chain of the certified biomass, including the end users.

Working Group B/C agrees. The editing and text revision of the Standards aim to ensure clarity and consistency of the requirements.

Working Group B/C discussed and concluded that stakeholder engagement requirements would be kept in Standard 4. Significant details on the Stakeholder Engagement Plan and its scope were added. A link to Standard 2 has been added, allowing Organisations applying Standard 2 to refer to the requirements in that Standard. Good practice examples of further certification schemes considered, such as FSC 40-004.

See comment above.

See comment above, including link to Standard 2.

S4	Feedstock Sourcing Requirements: feedback	While recognising the difficulties in traceability, it is imperative that to ensure compliance with regulations of the UK market, SBP require that tertiary feedstock meet the same requirements as secondary and primary feedstocks.	Working Group B/C is still discussing ways to consider tertiary feedstock in the system. For ensuring compliance with specific regulatory systems, see comments on RED11.
S4	Organisational requirements / 1.6. Stakeholder engagement: feedback	Yes, finally this is pragmatic approach, thx SBP.	You're welcome.

Standard 5 Revision Draft VI: Contributions and Responses

	Section Description	Comment	Response
S5	2.1 SBP Data Transfer System (DTS): feedback	Should reference 'GHG calculations', not just 'calculations' 2.2. Where should 'changes' be recorded? In a reissued SAR? 'Changes' should be defined clearly, and examples given. E.g., Normal/seasonal fluctuations in energy consumption should not be considered. However, plant configuration changes (e.g., change in drying technology, installation of RTQ) should be noted.	This is recorded in the SAR.
S5	2 SBP Data Transfer System (DTS): feedback	Why would not every chain in the CoC calculate their contribution to the GHG?	Every link in the chain provides data, and each legal owner may voluntarily calculate associated emissions. Standard 6 now mentions that legal owners may use the SBP calculator or other GHG calculators to perform GHG calculations, and that all legal owners may perform intermediate GHG calculations and pass their calculations on to the next legal owner(s).
S5	3.2. Product groups and batch specific data: feedback	Should also include that where an organisation adopts a non-proportionate approach/dynamic data, it is also required that the organisation shall provide accurate feedstock data pertaining to each batch of biomass supplied 3.3. The standard should make reference to the fact that sustainability characteristics shall not be swapped between batches due to its importance (or at a minimum this described within Standard 4)	Working Group B/C agreed to add text from Instruction Document 5E, section 3.3.3, namely: 'Feedstock shall retain its original characteristics as processed and characteristics shall not be transferred between transaction batches.
S5	C. Scope and D. How to use this document: feedback	We think it would be easy to have GHG data ready from each chain in the chain of custody including BPs per port/location as with for example GGL. This would make the GHG calculations clearer for everyone.	Working Group B/C agreed and Standard 6 now mentions that legal owners may use the SBP calculator or other GHG calculators to perform GHG calculations and that all legal owners may perform intermediate GHG calculations and pass their calculations on to the next legal owner(s).

S5	Standard 5 - General feedback	Intro B/6.1/6.2 – should acknowledge discussions within the technical sub-group and working group C around the development of voluntary standard allowing the BP to perform GHG calculations and pass this through the DTS, rather than saying the GHG calculation is the sole responsibility of the end user	GHG calculation falls within the scope of Standard 6.
S5	Standard 5 - General feedback	The draft revised documents and the suggested applicability and associated claims retain the flaws of the present standards, in that they refer to SBP providing assurance related to biomass production, but not the economically, environmentally and socially responsible biomass use that SBP states as its purpose. As such any errors of detail in the present standard or revised draft are dwarfed by errors of omission related to applicability to end users, certification of biomass use, and claims that certified end users might make.	Working Group B/C has ensured that the objectives and the scope of the Standard have been clarified.
S5	Standard 5 - General feedback	This is an extremely short standard now and adds little value. Why not lump all GHG requirements into a single document? Provide the regulators with a comparison table so that they can easily navigate between which SBP requirements attend to specific legal requirements.	For the sake of clarity, Working Group B/C decided to keep the original structure, with one Standard (Standard 5) dedicated to data collection and one Standard (Standard 6) dedicated to GHG emissions calculations.

Standard 6 Revision Draft v1: Contributions and Responses

	Section Description	Comment	Response
S6	2.1 Responsibilities: feedback	Is management representative not a bit formal? would a responsible employee not be enough?	This is typical of quality management system requirements.
S6	2.1 Responsibilities: feedback	These are management system requirements. Put in ST 2.	The intention of Standard 6 is to have a standalone, comprehensive Standard for End-users, so they are only audited against one Standard.
S6	2.2 Documented procedures: feedback	These are management system requirements. Put in ST 2.	The intention of standard 6 is to have a stand-alone, comprehensive standard for end-users, so they are only audited against one standard.
S6	2.2 Training: feedback	These are management system requirements. Put in ST 2. Too many training requirements across all standards. The SBP system is unnecessarily complex.	The intention of standard 6 is to have a stand-alone, comprehensive standard for end-users, so they are only audited against one standard.
S6	2.4 Record keeping: feedback	These are management system requirements. Put in ST 2.	The intention of standard 6 is to have a stand-alone, comprehensive standard for end-users, so they are only audited against one standard.
S6	2.5 Complaints: feedback	2.5.2 mentioned that the complaint procedure has to be publicly available? why is this and what does it mean? if we comply with the SBP complaint procedure why does it need to be public?	The intention of the procedure being publicly available is so that complainants know there is a process and how to follow it. It is also good practice to be transparent about procedures.

S6	2.6 Complaints: feedback	These are management system requirements. Put in ST 2.	The intention of standard 6 is to have a stand-alone, comprehensive standard for end-users, so they are only audited against one standard.
S6	3 Inputs: feedback	If the standard is applied at a facility level - this should consider biomass from non-SBP certified sources and what information is required (i.e., Pblids/SDI codes are not relevant)	To be certified against Standard 6, Organisations need to be certified as a minimum against Standard 4 (Chain of Custody) and Standard 5 (Collection and Communication of data). Compliance with Standard 6 alone does not permit any claims to be made on the sustainability of biomass used or supplied.
S6	3. Inputs: feedback	Repeat of ST 4. How does this add value? Put in ST 4 or alter the similar ST 4 requirements if there are slight differences for end-users.	The intention of standard 6 is to have a stand-alone, comprehensive standard for end-users, so they are only audited against one standard.
S6	4 Energy and carbon balance calculation: feedback	If the standard is applied at a facility level - this should consider biomass from non-SBP certified sources and ultimately what level of auditing is required for actual data used in calculations that has not been audited through standard 5.	To be certified against Standard 6, the Organisations need to be certified as a minimum against Standard 4 (Chain of Custody) and Standard 5 (Collection and Communication of data). Compliance with Standard 6 alone does not permit any claims to be made on the sustainability of biomass used or supplied.
S6	4 Energy and carbon balance calculation: feedback	Seems like this relates to ST 5. It could be placed there and made applicable to end-users only.	The intention of standard 6 is to have a stand-alone, comprehensive standard for end-users, so they are only audited against one standard.
S6	5 Business integrity, social, health and safety requirements in CoC: feedback	These are management system requirements. Put in ST 2. It is also mentioned in the draft of ST 4. Remove the department of redundancy department.	The intention of standard 6 is to have a stand-alone, comprehensive standard for end-users, so they are only audited against one standard.
S6	A. Introduction: feedback	Should acknowledge development of voluntary standard for BP to perform GHG calculation rather than saying the GHG calculation is the sole responsibility of the end user. Important considerations for implementation. Does the standard apply at a facility level (i.e., covers all biomass regardless of whether it is from SBP-certified sources; end users calculate a weighted average carbon intensity/GHG saving for all biomass sources) or at a supply chain level (i.e., covers all SBP-certified sources of biomass used by an installation; end users calculate carbon intensity/GHG saving for each individual supply chain/consignment)? Does the standard apply retrospectively (i.e., at the end of the year the auditor makes sure all consignments used/the facility has met the requirements) or prospectively (i.e., a calculation is made based on one year, and that GHG value applied for the following year)? On the basis that GHG values are unlikely required to be passed on to electricity suppliers (i.e., compliance is deemed at the point of generation), then retrospectively seems more appropriate.	Working Groups B/C agreed and Standard 6 now mentions that legal owners may use the SBP calculator or other GHG calculators to perform GHG calculations and that all legal owners may perform intermediate GHG calculations and pass their calculations on to the next legal owner(s). Instruction Documents will be used to assist implementation of these considerations.
S6	General feedback	I think the new standards looks very good and is workable	Thanks.