



Standards Development Process

SBP Standard 2: Feedstock Verification

Revision Draft v2 for Public Consultation

(for status see document history on page ii)

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sbp-cert.org

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A Purpose

- Standard 2 sets out how an organisation shall assess and manage the risks within its supply base related to the requirements and impacts arising from SBP Standard 1.
- The SBP system is based on a regional risk-based approach to identifying and managing risks. Organisations seeking certification are required to understand the risks that the requirements are not being met within the region it sources from (i.e., its supply base). Organisations also need to ensure that those risks are managed, and reduced to a low level where possible, and otherwise avoid sourcing feedstock associated with specified risks.
- Managing these risks depends on the organisation itself but also on its due diligence systems with other relevant operations within its supply chains.
- Only feedstock that has verifiably low risk can be considered SBP-compliant.

B Scope

- For use by organisations seeking or holding a SBP certificate and sourcing feedstock that is procured without a SBP claim and/or from an entity that is not SBP-certified.

C How to use this document

- This standard is for use in conjunction with SBP Standard 1, which outlines the principles, criteria and indicators that must be met for SBP-compliant feedstock. See also Standard 4 for management system, Chain of Custody (CoC), claims and trademark requirements.
- Requirements within Standard 2 are numbered and use the terms 'shall' or 'must'. Other elements of Standard 2 are for information or guidance.

D Normative references

- SBP Standard 1: Feedstock Compliance
- SBP Standard 3: Requirements for Certification Bodies
- SBP Standard 4: Chain of Custody
- SBP Standard 5: Collection and Communication of Data
- SBP Standard 6: Energy and Carbon Balance Calculation
- SBP Glossary of Terms and Definitions

E List of abbreviations

[to be completed]

1 Supply Base Definition and Mapping

Intent

To describe the Supply Base (SB) and what is being sourced from it, to identify possible threats and impacts of biomass sourcing.

Guidance on Supply Base Definition and Mapping

The order in which an organisation undertakes the supply base definition and mapping and ensuring traceability to the SB should depend on the status of sourcing already underway.

If the organisation is already sourcing from the SB then traceability may come first in order to allow the organisation to identify the extent of the SB which needs to be defined and mapped.

If the organisation has not yet started sourcing from the SB it may choose to define it first and then establish traceability to it.

Requirements

- 1.1 The organisation shall define and map its SB.
 - 1.1.1 The SB definition and mapping shall include the place of harvesting for all feedstock received that is used in the production of biomass that carries a SBP claim.
 - 1.1.2 The SB definition and mapping shall include which type of feedstock is used (primary, secondary, and/or tertiary). It shall also indicate which feedstock category is being sourced.

Feedstock categories are set out in Annex 1: Feedstock Definitions, column 4.
 - 1.1.3 The SB definition and mapping shall include a brief description of all relevant operators and stages within the biomass supply chain from the place of harvesting up to and including the organisation's own operations.
 - 1.1.4 The description of the supply chain and scale of maps of SB shall be appropriate to the size and complexity of the supply chain, in order to enable identification of critical nodes and processes.
 - 1.1.5 Geographic and other boundaries of the SB shall be defined and justified.
 - 1.1.6 If any sub-scopes are defined these shall be described, mapped, and justified. (See Guidance 3)
- 1.2 The organisation shall describe and categorise its feedstock profile by the mix of inputs.
- 1.3 The organisation shall keep records of feedstock inputs.
 - 1.3.1 The records of feedstock inputs shall show the relative volumes of different feedstock inputs used.
 - 1.3.2 The records of feedstock inputs shall include identification of volumes of primary, secondary and tertiary feedstock used, and a description of the inputs, including species.
- 1.4 The organisation shall categorise its mix of feedstock as the relative portions and/or volumes coming from:
 - a. SBP endorsed RRA with only low risks
 - b. SBP endorsed RRA showing specified risks
 - c. Fully SBP-endorsed sources
 - d. Partially SBP-endorsed sources
 - e. All other sources with no SBP-endorsed status

2 Traceability to the Supply Base

Intent

To verify that the organisation is only sourcing from within the defined SB.

Requirements

- 2.1 The organisation shall verify that all feedstock sourced can be traced back to the defined SB. To do so, the organisation shall ensure that the place of harvesting is within the defined SB.
- 2.2 The organisation shall maintain records of the place of harvesting of all feedstocks.
- 2.3 The organisation shall record the identity of all suppliers of feedstock by category(s) of feedstock supplied.
- 2.4 Where the organisation is physically mixing feedstocks from different sources, it shall demonstrate that it is not mixing non-compliant feedstocks with that which is SBP-compliant.

3 Supply Base Evaluation

Intent

To decide which elements of the SBE are needed.

Guidance on Supply Base Evaluation (SBE)

The SBE is a due diligence system to help identify, assess and manage any risks that the requirements set out in S1 are not met. It has various essential stages - information gathering, risk assessment and risk management. Within the SBE these stages are:

1. Reviewing SBP Standard 1: Feedstock Compliance against local legislation

To identify any conflicts between the requirements of SBP Standard 1 and legal requirements relevant to the Supply Base.

2. Defining sub-scopes within a SBE

The organisation needs to decide if it should break down its SB into sub-scopes. This should be done in cases where the risks of non-compliance with SBP Standard 1 within the SB are not homogeneous (see Guidance 3.3).

3. Developing Supply Base Verifiers (SBVs)

SBVs identify the evidence or means of verification (MoVs) that are appropriate to the SB and which allow the risks of the impacts identified in SBP Standard 1 to be assessed. The SBVs facilitate the assessment of the risks that organisations must manage, in the context of the defined SB.

4. Undertaking a Risk Assessment (RA)

The RA determines the risks associated with feedstock sourced by the organisation, and which the organisation shall have to mitigate or avoid. Risk is evaluated against the SBP indicators relative to the identified impacts contained in SBP Standard 1. The RA results in a risk rating for each indicator of 'specified risk', or 'low risk'.

5. Developing a Risk Management Plan (RMP)

Risk management is an opportunity for the organisation to reduce the risk level to low through implementation of risk management measures, when an indicator is rated as specified risk in the organisation's RA or in a SBP-endorsed Regional Risk Assessment (RRA).

Requirements

- 3.1 The organisation shall be responsible for developing, implementing, and maintaining a SBE.

Reviewing SBP Standard 1: Feedstock Compliance

- 3.2 The organisation shall review SBP Standard 1: Feedstock Compliance to:

- a. Identify any aspects that may conflict with legal requirements in the area to which the standard applies, and evaluate any effects on certification, in discussion with the affected parties

NOTE: Conflicts are considered to exist where a legal obligation prevents the implementation of some aspect of the generic standard. A conflict is not considered to exist if the requirements of the generic standard exceed the minimum requirements for legal compliance.

- b. Identify any instances where indicators include performance thresholds lower than the minimum legal requirement in the region concerned. When such instances are identified, the relevant thresholds should be modified to ensure that they meet or exceed the minimum legal requirements.
- 3.3 The organisation shall evaluate its feedstock sourcing to determine the scope of the SBE required for its defined SB.
- 3.4 The organisation shall justify the scope of the SBE required based on its mix of feedstock.
- 3.5 The organisation shall determine which of the following elements of a SBE, are required:
- a. Supply Base Verifier (SBV)
 - b. Risk Assessment (RA) and Risk Ratings (RR).
 - c. Risk Management Plan (RMP) containing Risk Management Measures (RMM).

The following components of a SBE shall apply when any feedstock is identified as coming from these sources:

Source of feedstock	Scope of SBE needed:		
	Supply Base Verifier development	Risk Assessment	Risk Management
RRA with all low risks	Not required	Not required	Not Required
RRA with some specified risks	Required where specified risk cannot be excluded	Required where specified risk cannot be excluded	Required to address gaps
No RRA available	Required	Required	Required
Partially certified or certified against a scheme that meets some of the SBP requirements	Required to address gaps	Required to address gaps	Required to address gaps
No certification	Required	Required	Required

In cases where gaps are identified, due to partial compliance of a source or RRA, they shall be addressed by the SBE.

[Defining sub-scopes within a Supply Base Evaluation](#)

3.6 The organisation shall establish supply base sub-scopes where the risks of impacts, identified within SBP Standard 1, are not homogeneous or not uniform within the SB.

Sub-scopes are defined physical areas or otherwise clearly delineated sources (see examples below) within the SB, where the risks of impacts are uniform.

Guidance on defining sub-scopes

Examples of variances within a SB that may result in variable risk and/or impact conclusions:

- Jurisdictional – the same laws and enforcement authorities apply across the area;
- Environmental – similar forest, habitat or ecosystem types, species composition, presence of high value biodiversity, climatic and soil conditions, etc.
- Social – the same resource use and access patterns, areas used by a coherent community, similar labour and employment patterns, operations impact on a single community, etc.
- Economic – the same or closely similar management structures, a consistent group of relevant operators, biomass is supplying the same market, etc.
- Feedstock type – the same or closely similar risks of impacts of feedstock categories (see Annex 1: Feedstock Definitions)

Examples of a sub-scope can include, but are not limited to:

- feedstock supplied by a single supplier
- feedstock harvested from a particular habitat type or /species or
- feedstock harvested using a particular harvesting method
- feedstock sourced from land under particular ownership – e.g., private versus state land
- feedstock sourced from a particular non-forest landscape – such as farmland, shelterbelts, urban areas, road and rail side plantings etc.,
- a geographical area covered by a SBP-endorsed Forest Management Scheme from which the BP receives Feedstock that does not carry a SBP-endorsed Forest Management Scheme claim
- areas with the same legislation regarding elements within SBP Standard 1 such as:
 - land ownership, use and harvesting rights
 - biodiversity, water, air and soil protection
 - basic labour rights and health and safety of forest workers
 - waste handling and disease control
 - licensing and replanting/regeneration requirements for tree felling.

3.7 The organisation shall ensure that the SBE is kept updated.

3.7.1 The organisation shall review the scope of its SBE prior to each annual audit and update it as necessary to reflect changes in its supplied feedstock and/or changes to risks in the supply base.

3.7.2 Any changes in the SB or supply chain which might reasonably affect the RA conclusions, or alter the required RMP of an SBE, shall result in an immediate review and, if deemed necessary, revision of the SBE by the organisation. Such changes include, but are not limited to:

- new legislation and/or jurisdictional changes
- new feedstock sources being proposed
- new suppliers and/or contractors being used
- new sustainability issues relevant to the SBP standard identified

- failure of any RMM within the RMP to address the specified risks

3.7.3 The organisation shall revise its SBE at least every 5 years.

3.8 Competence to undertake Supply Base Evaluations

3.8.1 The organisation shall establish a process for selecting and appointing an evaluation team (entity or individual(s)) with the required competences.

3.8.2 The organisation shall ensure that the evaluation team (entity or individual(s)) undertaking the SBE has/have and can demonstrate the necessary competence, knowledge and experience to evaluate the organisation's Supply Base and associated supply chains against SBP Standard 1 and the identified impacts, including, but not limited to knowledge of:

- Ecological and social values
- Applicable laws and regulations
- Business management practices
- The operation of suppliers and contractors, including management systems and products
- Competence in evaluating SBP requirements
- Competence in due diligence systems
- Language skills appropriate to all stakeholders
- Note-taking and report-writing skills
- Stakeholder engagement skills

3.9 Conclusions of the Supply Base Evaluation

3.9.1 Where results of the Risk Assessment(s) conclude Low Risk, then those sources are be considered SBP-compliant.

3.9.2 Where results of the RA conclude specified risk, and Risk Management Measures are unable to reduce the specified risk to a low risk, then those sources shall be considered non-compliant, the source(s) and the feedstock shall be physically excluded from SBP-certified biomass.

3.9.3 Where results of the RA conclude specified risk, but subsequent monitoring of Risk Management Measures designates low risk, then those sources are considered SBP-compliant.

4 Supply Base Reporting

4.1 The organisation shall prepare a report on its SB following the most recent version of the Supply Base report (SBR) template.

4.2 The organisation shall update its SBR annually, and each time the SBE is revised.

4.3 A SBR can include annexes that include the results of the SBE specific to the different sub-scopes (if used).

5 Supply Base Verifiers

Guidance on Supply Base Verifiers

As part of an approach to due diligence, Supply Base Verifiers (SBVs) are required to identify the information needed either in the form of pre-existing evidence or to develop new evidence that are appropriate to the supply base, and which enable the risks of the impacts identified in SBP Standard 1.

By developing these verifiers to be more specific to the SB and feedstock used by the organisation the SBVs facilitate the assessment of the risks, that organisations must manage, in the context of the defined SB.

Standard 1 lists potential and significant generic impacts that sourcing feedstock may have in relation to the indicators in SBP Standard 1. Not all of these impacts will necessarily manifest within a particular SB or feedstock type.

An non-normative SBP document [or Knowledge Base] describes possible indicator-specific MoVs that could be used to assess whether the risks of these impacts coming about are being adequately assessed and managed. Not all of this evidence will be available in every SB. It also describes Sources of Information that can be used.

That is why there is a need to develop an understanding of which impacts are material within the defined SB, amongst the relevant operators in the supply chain, and for the feedstock types that are being sourced by the organisation. That is also why a review of available verifiers is useful to understand where evidence needs to be identified to assess and manage risks.

SBV do not need to be approved by SBP.

Where possible SBVs should make use of credible, third party and published sources of information. This should be augmented where needed with an organisation's own work, utilising best practice where available. Interviews with relevant internal or external stakeholders can also be a significant source of information.

Requirements

5.1 SBVs shall not remove or weaken the indicators set out in SBP Standard 1.

5.2 SBVs shall not alter the intent of the indicators.

5.3 SBVs shall be developed to identify the type and sources of information needed to assess:

- Whether there are laws within the SB that address the identified impacts, such as
 - List of all relevant laws
 - Publicly available information on whether the relevant laws address the identified impacts – e.g. NGO reports, news coverage
- Whether these laws are enforced, such as
 - List and assessment of competent authorities and agencies
 - Publicly available information concerning whether the relevant authorities are implementing the laws effectively, e.g., NGO reports, news coverage
 - The perceived prevalence of corruption in the country and the relevant sector of society, and its effect on the implementation of these laws
 - Relevant Compliance & Enforcement frameworks?
- Whether relevant operators within the SB are implementing legal compliance and/or best practice to address the identified impacts, such as
 - List all relevant regional and local Best Management Practices (BMPs), including certifications, and/or Standard Operating procedures (SOPs) available and an assessment of whether they address the identified impacts
 - Description of the organisation's due diligence process with its suppliers and contractors
 - Description of the ways in which the organisation demonstrates implementation of BMPs and/or compliance with the regulatory requirements that address the 'impact'.
 - Any results of implementation of these systems
 - Existence of relevant Compliance & Enforcement frameworks
 - Any results from C&E or Monitoring Frameworks specific to this legislation
- What other verifiable, publicly available, current and credible evidence is there to show whether the impacts are happening 'on the ground'? The nature of such evidence is to describe the current condition and 'on-the-ground' situation in relation to the identified impacts. For example:
 - Monitoring protocols in place and results

- Landscape level assessments
- NGO Reports,
- News coverage,
- Inventory &/or analysis
- Compliance & enforcement results
- Assessment reports
- External Agency reports
- Publicly available data / websites
- Expert &/or Stakeholder information/results

6 Risk Assessment (RA)

Intent of the Risk Assessment

A RA is required to evaluate the risk for indicators within the SB following a rigorous risk evaluation framework, in order to identify low risk or specified risk.

Guidance on Risk Assessment

Third party certification of suppliers and contractors against elements of the SBP standards may mitigate, eliminate or reduce the risk of their non-conformity and meet these due diligence requirements. In this standard certification is regarded as a form of BMP (Best Management Practice).

The organisation should begin its RA at the regional level, rather than at the level of an individual forest or land unit.

- The assessments of laws and their enforcement should be undertaken at the level of the SB or sub-scope as by definition they will apply uniformly within each.
- Due diligence: The assessment of best management practices and its monitoring and evaluation may also be at a SB or sub-scope level but must also include an assessment of the quality of how individual relevant operators apply such best practice and undertake monitoring and evaluation within their own organisations and on the land they manage.

Any gap or shortfall identified at any of the 4 steps need to be filled by appropriate actions or further evidence in order to manage the identified risk and allow progress through to the next step of the decision tree.

For instance, a lack of relevant laws or inadequate enforcement of those laws identified in step 1 or 2 can be mitigated by implementing appropriate BMPs which addresses the relevant element of Standard 1 (as identified in step 3).

A gap or shortfall identified at step 4 leads to a conclusion of specified risk which must be managed.

Requirements

6.1 The Risk Assessment shall:

- assess whether there are laws in place that address the requirements and impacts identified in SBP Standard 1
- assess whether these laws are being enforced within the SB
- assess whether there is implementation of legal compliance and/or best practice to meet the requirements of SBP Standard 1 in the relevant operators:
 - assess whether BMPs/SOPs in the relevant operators address Standard 1
 - assess and verify the implementation of BMPs and SOPs by relevant operators
 - assess due diligence by the organisation of other relevant operators' implementation
- assess whether there is any independent credible evidence that the identified impacts are not

occurring within the SB.

- 6.2 The organisation shall conduct a RA to determine the level of risk of sourcing feedstock per SBP Standard 1 indicators, using identified SBVs.
- 6.3 The organisation shall assess risks within all relevant suppliers and contractors within its SB and supply chain. The organisation shall:
- conduct and record a due diligence process on its current and potential suppliers and contractors, including the organisations they sub-contract or source from, to assess their risk and compliance with SBP standard requirements
 - stipulate in their contracts with their suppliers and contractors that they accept the right of the organisation's certification body and/or internal staff to audit the supplier or contractor for conformity with this standard.
- 6.4 The organisation shall gather relevant information to allow it to assess risks within the SB. This shall reference current, credible, independent published/attribution (in the case of consultation) sources of information in its RA.
- 6.5 The organisation shall assign a single risk rating for each indicator, and for each indicator per sub-scope if used. The risk rating of the same indicator between sub-scopes may be different. Each indicator shall be assigned a risk rating on the following basis:
- Low risk: An indicator shall only be categorised as low risk if there is evidence of negligible risk of non-conformance with the indicator.
- Specified risk: All indicators that cannot be categorised as low risk shall be considered specified risk. Risk Management Measures are required for any indicator where the risk is classified as specified. The nature of each specified risk must be clearly detailed to ensure that adequate Risk Management Measures can be identified.
- NOTE: Risk terminology might be adapted after public consultation, to align with other certification systems and/or other widely accepted risk terminologies*
- 6.6 The organisation shall provide justification, supported by adequate evidence, for its final determination of risk rating(s) for all indicators in its RA.
- This justification shall be derived from the identified SBVs. This information shall be included in the organisation's SBE report.
- 6.7 The RA shall be signed off by senior management in the organisation.
- 6.8 The organisation shall regularly review the need to revise its RA and/or risk ratings.
- 6.9 The organisation shall review its RA for accuracy and completeness prior to each annual audit.
- 6.10 Any changes in the SB or supply chain which might reasonably affect the RA conclusions shall result in an immediate review and, if deemed necessary, revision of the RA by the organisation to ensure that the RA remains accurate.
- Such changes may include but are not limited to:
- a. Introduction of new legislation and/or jurisdictional changes
 - b. New feedstock sources being proposed
 - c. New main suppliers and/or contractors being used
- 6.11 The organisation shall carry out a complete revision of its RA every 5 years and update it as necessary.

7 Risk Management

Intent of Risk Management

A Risk Management Plan (RMP), comprised of Risk Management Measures (RMM), must be developed and implemented by organisations where their RA, or a SBP-endorsed RRA, concludes specified risk for one or more indicators within their SB.

The purpose of risk management is to put measures (i.e., actions or requirements) in place directly with relevant suppliers to effectively reduce risks or, if that is not possible, to avoid sourcing feedstock that does not comply with SBP requirements (SBP Standard 1).

RMMs describe the specific actions required to reduce, avoid or otherwise manage a risk's impact or likelihood.

There are three general strategies in the SBP system:

- a. Risk acceptance is only allowed for sources identified as low risk.
- b. Risk mitigation is a risk management strategy used by organisations to reduce the impact or the likelihood of a risk being realized. This strategy limits an organisation's exposure by taking specific actions.
- c. Risk avoidance is a risk management strategy used by organisations to eliminate all exposure to the risk. It may include eliminating certain sources or basing the production on a different feedstock.

Requirements

- 7.1 The organisation shall implement a Risk Management Plan which includes Risk Management Measures (RMM) for each indicator rated as specified risk within their SB (per the organisation's RA or a SBP-endorsed RRA), relative to the identified impacts in SBP Standard 1. The RMP shall identify required RMM to be implemented by relevant operators in the supply chain to address all specified risks,
- 7.2 The RMP shall identify the measures to be implemented in order to prevent non-compliant feedstock from being sourced.
- 7.3 The organisation shall implement any RMM proposed by SBP (e.g., in guidance documents) or SBP-endorsed RRAs.
- 7.4 Where there are no RMM proposed by SBP, the organisation shall develop its own based on available best practice, knowledge of its specific suppliers and risk factors, and other relevant factors.
- 7.5 RMM shall be justified and documented, with records of implementation maintained.
- 7.6 The RMP shall be signed off by senior management in the organisation.
- 7.7 The organisation shall maintain and implement a documented procedure for monitoring the effectiveness of its RMP at least every 12 months, prior to its annual audit.
- 7.8 Where RMMs are found to have not been effective in managing risk, sourcing shall be stopped for the sources where the risk has been identified. Further measures shall be implemented and deemed effective in order for the feedstock to be considered compliant with SBP Standard 1 and sourcing resumed.
- 7.9 The organisation shall, by written records, demonstrate that the due diligence is applied regularly to the relevant operators in the supply chain.
- 7.10 The organisation shall stop sourcing from suppliers and working with contractors who, following request, fail to demonstrate that they are effectively managing specified risks.

8 Stakeholder Engagement

Guidance on Stakeholder Engagement

The principles in FSC-STD-20-006 Stakeholder Consultation for Forest Evaluations are recommended as good practice.

The following are examples of relevant stakeholder groups:

- any registered committee or working group developing forestry standards
- the state forest service
- NGOs that are involved or have an interest in social or environmental aspects of forest management, either at national or sub-national level, in the locality of the SB to be evaluated
- representatives of indigenous peoples and local communities involved or interested in forest management, either at national or sub-national level, in the locality of the SB to be evaluated
- representatives of forest workers
- representatives of forest harvesting industry/forest owners' associations
- forest research and education institutions
- forest industries and associations.

Requirements

- 8.1 The organisation shall engage with its stakeholders, with the specific intention of seeking feedback on its SBE, including:
 - a. its SBVs,
 - b. Risk Assessment and Risk Ratings, and
 - c. The Risk Management Plan and monitoring procedures where applicable.
- 8.2 The organisation shall engage with its stakeholders each time the SBE is subject to a complete revision. This shall be done at least every five (5) years. If, in the interim, there are changes that are of significant importance to stakeholders, the organisation should engage stakeholders on these specific changes.
- 8.3 The organisation shall also consider any consultations undertaken as a consequence of, e.g., forest operations, plant construction or planning processes, and the outcomes of stakeholder consultations associated with existing certifications of the organisation's management systems.
- 8.4 The organisation shall seek to address relevant stakeholder concerns. It is not required to achieve a consensus with stakeholders.
- 8.5 The organisation shall contact stakeholders in the country or region concerned.
- 8.6 The organisation shall allow stakeholders at least one month's time to provide feedback before documents are finalised.
- 8.7 The organisation shall provide stakeholders with adequate information as a basis for informed comment, but do not have to provide sensitive or commercially confidential information.
- 8.8 The organisation shall keep the following records:
 - a. lists of individuals/organisations invited to comment; and
 - b. copies of all correspondence and/or comments received with respect to the SBE and its components.
- 8.9 The organisation shall provide those stakeholders engaged with feedback on their comments and the revised SBR.

Annex 1: Feedstock Definitions

See Requirement 1.1.2:

“The SB definition and mapping shall include which type of feedstock is used (primary, secondary, and/or tertiary). It shall also indicate which feedstock category is being sourced.”

