SBP Standard 3: Requirements for Certification Bodies
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### Annex 1
- Certificate Transfers
A  Summary of changes between draft 1 and draft 2

- CBs shall hold accreditation to ISO 17065 in accordance with SBPs contractual and scope requirements. This means CBs must be conformant to ISO 17065 and this standard, and verified through accreditation.
- This draft includes only the SBP requirements that are in addition to the requirements of ISO 17065, i.e. reference to specific ISO 17065 clauses have been removed.
- Selective ISO 17021 requirements are included, specifically for competence of personnel and planning audits.
- Incorporates SBP-specific requirements, currently found in SBP Instruction Documents and interpretations.
- Further changes/additions were made to meet the anticipated REDII requirements.

B  Introduction

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

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

There are six SBP standards, which collectively represent the SBP certification framework, or scheme, against which organisations can be assessed for conformance by independent third-party Certification Bodies (CBs). Wherever possible, the framework takes into account and builds on existing regulatory mechanisms and on voluntary certification standards already applied to other forest product streams or to other biomass sources. An organisation that satisfactorily demonstrates conformance receives a certificate and may be entitled to make SBP claims in relation to its certified biomass.

The SBP framework is made freely available for use by all supply chain actors.

C  Objective

The objective of this standard is to ensure that CBs operate in a consistent, reliable and credible manner, thereby facilitating their acceptance on a national and international basis, thus furthering trade and promoting sustainable biomass use.

The standard also aims to ensure recognition of SBP by EU regulatory bodies for conformance with relevant regulations, such as DIRECTIVE (EU) 2018/2001(REDD) and/or further current or upcoming regulations.
D Scope

This document (SBP Standard 3: Requirements for Certification Bodies) specifies the requirements for all CBs providing SBP certification including the audit of Biomass Producers (BPs), Supply Base Evaluations (SBEs), Chain of Custody (CoC) systems, certification claims made by Certificate Holders, and GHG calculations.

CBs accredited to SBP shall carry out all activities related to SBP certification in conformance with this standard.

E How to use this document

This standard is intended for use with the SBP standards (SBP standards 1, 2, 4, 5 and 6, as applicable) for applicants and certificate holders (hereinafter referred to as clients), as well as any posted SBP Instruction Documents (see https://sbp-cert.org/documents/standards-documents/instruction-documents/instruction-documents-accompanying-standard-3/) and/or Normative Interpretations (see https://sbp-cert.org/documents/interpretative-documents/normative-interpretations/).

F Normative references

IAF MD 1:2018 IAF Mandatory Document for the Audit and Certification of a Management System Operated by a Multi-Site Organization


ISO/IEC 17065:2012 Conformity assessment Requirements for bodies certifying products, processes and services

SBP Standard 1: Feedstock Compliance
SBP Standard 2: Feedstock Verification
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
1 CB eligibility requirements

1.1 To carry out conformance assessments of SBP Standards CBs shall hold accreditation to ISO 17065 in accordance with SBPs contractual and scope requirements for this standard and any of the relevant SBP Standards 1, 2, 4, 5 and 6.

1.2 In addition to 2.1, CBs shall hold at least one of the following accreditations: Forest Stewardship Council® (FSC®), Programme for the Endorsement of Forest Certification (PEFC) and/or Sustainable Forestry Initiative (SFI) accreditation.

1.3 The FM or CoC scope of the CB’s FSC, PEFC or SFI accreditation shall be equivalent to the applicable scope for their SBP accreditation (feedstock sourcing or CoC respectively).

For certifying SBP traders and end users, the FSC, PEFC, or SFI accreditation scope for CoC is sufficient for the CB.

1.4 The geographical scope of the CB’s FSC, PEFC or SFI accreditation shall match the applicable scope for their SBP accreditation, and shall cover the supply base areas of the auditee.
2  Certification agreement

2.1  The CB certification agreement shall require that the client complies at least with the following:

a.  the client provides the CB and SBP, and their respective authorised personal or entities, access to the client’s premises at any reasonable time (or to arrange for such authorised representatives to have access to other relevant premises owned or controlled by the client or its group companies) for the purpose of inspecting and taking copies of any information, documentation, goods, books and records deemed necessary by the CB or SBP

b.  the client promptly provides to the CB and SBP, and their respective authorised agents, all such information, documentation books and records deemed necessary by the CB or SBP

c.  the client complies and continues to comply with all the CB’s and SBP requirements, arrangements and licences regarding claims, logos, certification marks, trademarks or any other intellectual property rights of the CB and SBP

d.  the client informs its CB within 15 calendar days about changes within its supply base, operations, management and/or subcontractors that may affect the validity and/or scope of their certification, or the timing of their next audit

e.  the client complies and continues to comply with all the CB’s conditions and terms for maintaining, renewing and re-issuing of the certificate, including but not limited to the full implementation of any actions required to correct all non-conformances that were identified prior to the issue of the certificate

f.  the client undergoes surveillance as determined by the CB

g.  the client corrects any non-conformances with the applicable standard(s) identified during surveillance audits within the minimum period specified by the CB

h.  the client complies and continues to comply with all agreements and arrangements between the client and SBP and all SBP requirements

i.  upon suspension, withdrawal, or termination of certification, the client shall:

   i.  immediately at its own expense remove SBP’s name (in any form), initials, logo, certification mark, trademarks and intellectual property from its products, information, website, documents, advertising or marketing or any other materials

   ii.  immediately cease and desist from using SBP’s name (in any form), initials, logo, certification mark, trademarks and intellectual property

   iii. immediately cease to sell any products with SBP claims or references or SBP name or any SBP marks or any intellectual property relating to SBP or make
any claims or representation (oral or written) that imply that it complies with the requirements of the Certificate, CB or SBP

iv. where a product (including biomass) has been supplied with a SBP-compliant claim or representation or mark, immediately identify all relevant customers/purchasers who are in receipt of, or have ordered such product, and notify each of such customers/purchasers of the suspension, withdrawal or termination (as the case may be) in writing within three (3) business days of the suspension, withdrawal or termination and maintain records of such notification

v. provide such co-operation and information as may be required by CB or SBP to enable CB or SBP to verify and confirm that the Client is in conformance with all its obligations to CB and SBP

j. the client destroys the original CB-issued certificate, and any copies (electronic or printed) in its possession or control, upon withdrawal or termination of its certificate

k. the client authorises the CB and/or SBP to use and process any information relating to the client, or otherwise provided by or through the client, including but not limited to any Supply Base Report (SBR); CB public summary reports; data required by SBP for GHG calculations and regulatory reporting; any data required by SBP to be supplied to the client’s purchaser/customer with each batch of biomass supplied or sold

l. the client entitles and authorises both the CB and SBP to process the client’s personal data and business data (so far as is necessary for the purpose of performance obligations to CB and/or SBP) in accordance with Directive 95/46/EC of the European Parliament and of the Council on the protection of individuals regarding the processing of personal data and on the free movement of such data, and any other applicable data protection legislation.
3 Resource Requirements

3.1 The CB shall employ, or have access to, sufficient human and technical resources to manage the SBP certification scheme to consistently meet requirements of this standard, including prescribed timelines, and provide prompt and effective service for all clients.

3.2 The CB shall require auditors and technical experts to sign a written agreement by which they commit themselves to comply with applicable policies and implement processes as defined by the CB and SBP. The agreement shall address aspects relating to confidentiality and impartiality and shall require the auditors and technical experts to notify the CB of any existing or prior relationship with any organisation they may be assigned to audit.

3.3 The CB shall ensure, and be able to demonstrate that, personnel have appropriate competencies relevant to their activities (such as application review, auditing, granting of certification, monitoring of auditors).

3.4 The CB shall identify training needs and shall offer or provide access to specific training to ensure its auditors, technical experts and other personnel involved in certification activities are competent for the functions they perform.

3.5 The CB shall ensure that each person involved clearly understands their duties, responsibilities and authorities.
4 Auditors

Qualification

4.1 The CB shall ensure that auditors are qualified and maintain their qualification for auditing against at least one of the following standards:

- For audits against SBP Standards 1 and 2, and related documents: FSC, SFI, or any PEFC endorsed Forest Management standard
- For all other SBP audits: FSC, PEFC or SFI Chain of Custody standards.

4.2 For qualification to audit SBP Standards 1 and 2, and related documents, auditors shall have:

a. a tertiary education in a relevant discipline (e.g., forest or other natural resource management, and/or labour/social issues) and 3 years of professional experience relevant to the scope and geographical location of the audit, or
b. a secondary education in a relevant discipline (e.g., forest and/or other natural resource management, and/or labour/social issues) and 5 years of professional experience relevant to the scope and geographical location of the audit and to their role (e.g., legislation, regulations or other forest certification standards).

4.3 For qualification to audit SBP Standard 6, auditors shall have experience in the calculation of energy and carbon balances and be knowledgeable of the methodology relevant to the scope of the audit.

4.4 Auditors shall be approved by SBP for their tasks, prior to undertaking those tasks. Confirmation of approval is available to CBs from SBP.

4.5 For maintaining the qualification of the auditor, the CB shall ensure that the auditor:

- has performed a minimum of three (3) SBP external audits in the previous 12 months
- has maintained their CoC and/or FM auditor qualification, as applicable, per 5.1. If the auditor does not maintain their CoC/FM auditor qualification per 5.1, the CB shall demonstrate how the auditor’s competence for SBP audits is maintained.
Training

4.6 The CB shall ensure that auditors have successfully passed the initial auditor training courses approved by SBP.

4.7 The CB shall ensure that active auditors have successfully passed any auditor training courses approved by SBP that are required to maintain competence (e.g., after standard revision).

NOTE: details about training courses, e.g., timelines for completion, will be provided in a separate training schedule document upon availability.

4.8 The CB shall ensure that active auditors maintain their competence regarding SBP interpretations, CB procedures and best audit practice through regular training events.

Selection and authorization

4.9 The CB shall have processes for selecting, training, and formally authorising auditors, and for selecting and familiarising technical experts used in certification activities. The initial competence evaluation of an auditor shall include assessment of their ability to apply required knowledge and skills during audits, as determined by a competent evaluator observing the auditor conducting an audit.

4.10 The CB shall ensure that auditors (and, where needed, technical experts) are knowledgeable of its audit processes, certification requirements and other relevant requirements. The CB shall give auditors and technical experts access to an up-to-date set of documented procedures giving audit instructions and all relevant information on the certification activities.

4.11 The CB shall ensure that the group or individual that takes the decision on granting, refusing, maintaining, renewing, suspending, restoring, or withdrawing certification, or on expanding or reducing the scope of certification, understands the applicable standard(s) and certification requirements, and has demonstrated competence to evaluate the outcomes of the audit processes including related recommendations of the audit team.

Performance evaluation

4.12 The CB shall ensure the satisfactory performance of all personnel involved in the audit and other certification activities. There shall be a documented process for monitoring competence and performance of all persons involved, based on the frequency of their usage and the level of risk linked to their activities. In particular, the CB shall review and record the competence of its personnel in the light of their performance to identify training needs.
4.13 The CB shall monitor each auditor considering each type of management system to which the auditor is deemed competent. The documented monitoring process for auditors shall include a combination of on-site evaluation, review of audit reports and feedback from clients or from the market.

NOTE: This monitoring should be designed in such a way as to minimise disturbance to the normal processes of certification, especially from the client's viewpoint.

4.14 The CB shall periodically evaluate the performance of each auditor on-site at an audit relevant to the scope of their authorisation. The frequency of on-site evaluations shall be based on need determined from all monitoring information available, but shall not exceed three (3) years.

NOTE: On-site evaluations can be combined with witness audits for other certification schemes if the scope is relevant for evaluating their performance for their full scope of SBP audit authorisation.
5 Subcontracting

5.1 The CB shall have a process which describes the conditions under which subcontracting to another organisation, to provide part of the certification activities on behalf of the CB, may take place.

5.2 The CB shall have a legally enforceable agreement for the arrangement(s) it has with each body that provides subcontracted services, which shall include at minimum confidentiality requirements and the identification and avoidance of conflicts of interests.

5.3 The CB shall not subcontract decisions for granting, refusing, maintaining, renewing, suspending, restoring, or withdrawing certification, or for expanding or reducing the scope of certification.

5.4 The CB shall have a process for the approval and monitoring of all bodies that provide subcontracted services used for certification activities, and shall ensure that records of the competence of all personnel involved in certification activities are maintained.

NOTE 1: Where the CB engages individuals or employees of other organisations to provide additional resources or expertise, these individuals do not constitute subcontracting provided they are individually contracted to operate under the CB’s management system.
6  Planning audits

Audit team selection and assignments

6.1 The CB shall have a process for selecting and appointing the audit team, including the audit team leader and technical experts as necessary, considering the competence needed to achieve the objectives of the audit and requirements for impartiality. The process shall follow the requirements of ISO 19011.

6.2 The CB shall ensure that the audit team undertaking an audit against any SBP standard has the combined necessary knowledge and experience to evaluate the client against the applicable standard(s), for the given scope of the evaluation/certificate and the geographical location, including the following:

- For auditing against SBP Standards 1 and 2: knowledge and experience in land use criteria, such as ecology, natural science, forestry, silviculture or similar.
- For auditing against SBP Standards 5 and 6: knowledge and experience in GHG criteria (GHG emission calculation at the end-user level), including minimum of two years’ experience in biofuels life-cycle assessment, and specific experience in auditing GHG emission calculations following the RED/REDII calculation methodology or equivalent, and relevant experience depending on the type of audits to be conducted by the individual auditor.
- For auditing against SBP Standard 4: knowledge and experience in chain of Custody criteria: Experience in mass balance/credit systems, supply chain logistics, book keeping, traceability, data handling or similar.

6.3 The CB shall ensure that the audit team undertaking an audit against SBP Standards 1 and 2, and/or related documents has the combined necessary knowledge and experience to evaluate the local context of the Supply Base (SB), including:

- Knowledge of ecological and social values associated with the SB
- Knowledge of applicable laws and regulations
- Knowledge of business management practices
- Knowledge of operation of suppliers, including management systems and products
- Knowledge of the local forest resource
- Language skills appropriate to all stakeholders

6.4 The CB shall ensure that, for audits against SBP Standards 1 and 2, and/or related documents, the audit team includes a local expert with a minimum of three (3) years’ full time experience in the forestry sector in the Supply Base region. In case of on-site visits, the local expert shall join the on-site visits.

6.5 If there is only one auditor, the auditor shall have the totality of the competences identified by the CB for the audit.
6.6 In deciding the size and composition of the audit team, the CB shall consider:
   a. audit objectives, scope, criteria and estimated audit time, and
   b. the overall competence of the audit team needed to achieve the objectives of the
      audit as per 7.1 - 7.5.

6.7 The necessary knowledge and skills of the audit team leader and auditors may be
supplemented by technical experts, translators and interpreters who shall operate under
the direction of an auditor. A technical expert shall not act as an auditor in the audit team.
The technical experts shall be accompanied by an auditor.

NOTE: Technical experts are particularly useful for providing geographical competence.
The criteria for the selection of technical experts are determined on a case-by-case basis
by the needs of the audit team and the scope of the audit.

Determining audit time

6.8 The CB shall have documented procedures for determining audit time. For each client
the CB shall determine the time needed to plan and accomplish a complete and effective
audit of the client’s management system.

6.9 In determining the audit time, the CB shall consider at least the following:
   a. the requirements of the relevant management system standard (example: how
      many SBP standards and Instructions documents apply)
   b. complexity of the client and its management system
   c. technological context (example: producing chips vs pellets)
   d. any subcontracting of any activities included in the scope of the management
      system
   e. the results of any prior audits
   f. size and number of sites, their geographical locations and multi-site considerations
   g. the risks associated with the products, processes or activities of the organisation
   h. whether audits are combined, joint or integrated.

NOTE: Time spent travelling to and from audited sites shall not be included in the
calculation of the duration of the management system audit days.
6.10 The onsite duration of an audit of a BP shall depend on:

- the applicability of SBP Standard 1
- the area and diversity of the Supply Base for which an SBE has been carried out
- the existence of an approved Regional Risk Assessment (RRA)
- the results of the Supply Base Evaluation (SBE) (i.e., # indicators evaluated as unspecified risk)
- the type of feedstock (primary, secondary and/or tertiary)
- the # of FMUs and/or active suppliers in the BP’s supply chain
- the # of mitigation measures and where these are enforced (example: at mill gate, in the FMU).

6.11 The onsite duration of the audit of a BP should be a minimum of 1 day (8 working hours). In case the duration of an audit of a BP is less than 1 day (8 working hours), the CB shall justify this reduction based on 7.8 - 7.10 and 7.12 – 7.13.

6.12 The audit duration shall be sufficient to evaluate the effectiveness of any mitigation measures that have been defined, in conformance with the sampling requirements defined below.

6.13 The CB shall ensure that planning for audits against multiple certification systems (example: SBP, FSC, PEFC), or different legal entities under common ownership, includes adequate auditing time to provide confidence in the certification decision for each system/entity.

NOTE: The same evidence may be relevant for more than one certification system or legal entity

6.14 In such cases as described above, the operational locations shall be subject to the conditions specified in IAF MD1 and each BP shall be audited on-site annually.

NOTE: SBP only allows one BP site to be included in a single certificate. A single pellet mill is considered a BP. Multi-site approaches may only extend to multiple operational locations within the scope of one BP, e.g., a pellet mill operating two port facilities.

Sampling

6.15 If the CB provides

- certification of several certification systems (example: SBP, FSC, PEFC), or
- audits of different legal entities under common ownership that are being audited simultaneously,

the audit planning shall ensure adequate on-site auditing of each legal entity to provide confidence in the SBP certification.

NOTE: Although the same evidence may be relevant for more than one legal entity (e.g., the SBE is identical for all legal entities), planning shall ensure adequate on-site auditing to provide confidence in the certification decision for each legal entity.
6.16 Logistic sites shall be considered as temporary sites for application of IAF MD1, and thus do not need to be sampled.

6.17 Storage sites shall be considered as permanent sites, and thus need to be sampled according to the IAF MD1 rules.

6.18 When the SBP scope covers storage, logistics and/or port facilities, the CB shall categorise the sites and, where relevant, justify the sampling methodology in the Public Summary Report.

6.19 When auditing of risk evaluation and/or mitigation measures needs to take place at FMU and/or supplier level, the CB shall calculate the sample of the FMUs and/or suppliers to be audited using the following formula:

\[ Y = 0.8 \times \sqrt{X} \] (main audits) OR

\[ Y = 0.6 \times \sqrt{X} \] (annual audits)

where \( X \) = number of FMUs or suppliers. If both are applicable, the largest number prevails.

NOTE: Example calculation: If two sawmills supply a pellet mill, and each of the two sawmills buys from 100 FMUs, the sample should be calculated from 200 FMUs, not from 2 sawmills.

6.20 The CB shall either

a) make a random selection of the actual FMUs and/or suppliers to audit, or

b) shall select the actual FMUs and/or suppliers to audit according to a sampling plan with no bias. In this case, the selection methodology shall be justified in the audit report.
7 Initial and re-evaluation audits

7.1 When registering new applicants in the SBP Audit Portal, the CB shall:
   a. require applicants to disclose on registration whether they are a current or previous participant of another REDII recognised Voluntary Scheme, and also whether they had a different legal form or name in the past 12 months,
   b. check other Voluntary Scheme certificate lists for the name of the applicant, or former name, within the past 12 months,
   c. perform a Customer Due Diligence/ Know Your Customer check, in particular for companies with a limited trading history, to bring to the attention of SBP any applicants seeking re-certification who were previously found to be in non-conformance with the requirement to inform SBP about participation in other Voluntary Schemes.

7.2 For new applicants, the CB shall conduct an initial evaluation before issuing a certificate to the organisation.

7.3 Initial evaluations shall always be conducted onsite.

7.4 The CB shall ensure that a full re-evaluation is conducted prior to the expiration date of the certification for any organisation seeking to maintain their certification status beyond the expiration date.

7.5 Audits need to establish at least a “limited assurance level” (see glossary)

[NOTE: this requirement will be taken out of Standard 3 and integrated into a separate document on REDII-specific requirements]

7.6 For an initial evaluation, before participation in a scheme, the auditor shall check the existence and set-up of the mass balance system.

7.7 When auditing processing residues or waste feedstock, the auditor shall check at least the following:
   a. documentation for the origin of the feedstock
   b. classification of the feedstock as a processing residue or waste
   c. information on feedstock suppliers
   d. the systems used by BPs for accuracy, reliability and protection against fraud, including verification that materials are not intentionally modified or discarded so that the consignment or part thereof could become a waste or residue.
Stakeholder engagement verification

7.8 For initial and re-evaluation audits, the CB shall provide the following information to SBP, at least one month prior to the start of the audit, for posting to the SBP website: details on the entity or entities to be assessed, their location, the dates of the audit and contact details for both the company and the CB (to facilitate comments from stakeholders to the CB). This information shall be provided to SBP in English and other relevant languages where appropriate.

7.9 The CB shall review available stakeholder comments for evidence of conformance or potential non-conformance with relevant requirements before the evaluation takes place.

7.10 Information gathering shall include any information provided by SBP, the engagement plan from the client and actively collected stakeholder comments which are linked to specific questions and risks identified in the SBE.

7.11 The results of the information gathering shall inform the audit topics, intensity and sample sites.

7.12 Relevant comments/data shall be uploaded to the SBP stakeholder hub within 90 days of the closing meeting of the audit.

NOTE: pending development of SBP stakeholder hub (=consultation database)
8 Non-conformances

8.1 The CB shall make certification decisions based on their evaluation of the organisation's conformance with each applicable requirement, as specified in the relevant SBP certification standard(s).

8.2 The CB shall record in the evaluation report or associated checklists all non-conformances with the applicable requirements of the relevant SBP certification standard(s) that it identified.

8.3 The CB shall identify and evaluate each non-conformance to determine whether it constitutes a minor or major non-conformance. Each non-conformance shall result in an effective corrective action.

8.4 The CB may identify emerging issues, which, if not addressed by the client, may lead to future non-conformances. Such issues, when identified, shall be recorded in the audit report as 'opportunities for improvement' for the benefit of the client.

8.5 The CB shall consider a non-conformance as major if, either alone or in combination with further non-conformances, it results in, or is likely to result in, a fundamental failure to meet the relevant requirement(s) for operation(s) within the scope of the evaluation.

Such failure shall be indicated by non-conformance(s) which:

a. continue over a long period of time, or
b. are repeated or systematic, or
c. affect a wide range of the production, or
d. demonstrate failure of management systems ("systemic" failure), or
e. threaten the integrity of the affected SBP-certified products and the credibility of the SBP trademarks, or
f. are not corrected or adequately addressed by the responsible managers, once they have been identified.

8.6 Corrective actions shall adhere to the following timeframes:

- Minor non-conformances shall be corrected within one year.
- Major non-conformance shall be corrected within three months.

8.7 Action(s) to correct a major non-conformance may take more than three months to complete, but sufficient action shall be taken within the specified period, to prevent new instances of non-conformance within the scope of the certification.

8.8 Corrective action timelines commence from the date of the closing meeting of the audit.

8.9 The CB shall determine whether effective corrective action has been implemented within its timeframe. If the action taken is not considered adequate to prevent re-occurrence / ensure conformance, then:

a. minor non-conformances shall be re-categorised as major non-conformances, which shall be corrected within a maximum period of three months starting from the end of the original timeline,

b. major non-conformances shall lead to immediate suspension of the certificate,

c. major non-conformances shall not be downgraded to minor non-conformances.

8.10 The CB shall issue or re-issue a certificate only if all identified non-conformances are closed.
9  Reporting requirements

9.1  The CB shall use the SBP Audit Portal for preparing audit reports.

9.2  Public summary audit reports and updates shall be completed in the Audit Portal no later than ninety (90) days after the closing meeting of the audit.

9.3  The CB shall enter all required information in the SBP Audit Portal and maintain it up-to-date as necessary.
10 Peer Review

The purpose of the peer review is to ensure the quality and consistency of certification decisions across certificates and certification bodies.

General Requirements

10.1 Prior to making a certification decision, the CB shall submit the draft certification report to a formal peer review process, for the following audit scopes:
   - initial and re-evaluations against Standard 1;
   - extension of scope of the Supply Base Evaluation; and
   - evaluation for consideration of re-instatement of any suspended certificate that includes a Supply Base Evaluation.

NOTE: A CB may apply to SBP to waive the peer review where this would not affect the quality of the audit or reporting. An example might include where suspension has resulted from non-payment of CB fees.

10.2 The peer review is to be conducted after the CB considers that a positive certification decision is warranted. As such, the peer review does not qualify for meeting the requirements of technical review and is additional to that.

10.3 The CB shall maintain and implement documented policies and procedures for maintenance of confidentiality, including a written confidentiality agreement to be signed by all peer reviewers.

10.4 Peer reviewers’ confidentiality contracts with CBs shall not extend to providing information to SBP or ASI. Peer reviewers shall have the right to inform SBP and ASI if they consider the CB has not met SBP’s requirements in issuing the certificate.

Selecting and contracting a peer reviewer

10.5 The CB report shall be reviewed by at least one (1) independent peer reviewer selected from the list of approved peer reviewers published on the SBP website.

NOTE: The CB may engage additional reviewers (for example, with specialist knowledge concerning Indigenous Peoples rights or high conservation values) where necessary.

10.6 Selected peer reviewers shall not have been otherwise contracted by the CB during the last two (2) years.

10.7 The CB shall require that peer reviewers disclose any prior association with the client, and be subject to the same requirements relating to independence and confidentiality as other CB personnel with influence on the certification decision.
Peer review process requirements

10.8 The CB shall provide the peer reviewer(s) with clear terms of reference, including at least the following:
   a. expected response times / timelines
   b. the requirement to comment explicitly on:
      • the adequacy of the field work as the basis for making a certification decision
      • the clarity of presentation of the observations as the basis for a certification decision, and
      • whether the proposed certification decision is justified by the observations presented.

10.9 Peer reviewers may comment on any aspect of the certification decision process, including (but not limited to) resource requirements and process requirements.

10.10 The review shall encompass all areas of the audit and the certification decision processes such that the reviewer can consider the entire and complete certification decision process.

10.11 The CB shall provide the peer reviewer with all relevant information to enable them to provide adequately informed comment.

10.12 Upon request, the CB shall provide the peer reviewer with revised documentation or additional evidence as necessary to evaluate the CB’s certification decision, or the CB shall provide written justification to the peer reviewer for declining to provide requested additional information.

NOTE: In the event of a difference of opinion between the CB and the peer reviewer, SBP may provide guidance.

10.13 The CB shall ensure that the peer reviewer has taken account of the local and national context with regards to the Supply Base, and has considered environmental, social and economic perspectives.

10.14 The CB shall ensure that the comments of the peer reviewer are attributed and documented.

10.15 The CB shall respond in writing to the peer reviewer’s comments identifying what, if any, changes were made to address the comments, and provide the peer reviewer with a copy of its response.

10.16 The CB shall take a positive certification decision only after the peer reviewer has submitted a final report in support of the draft decision.
Records and reporting

10.17 The CB shall maintain accurate and complete records including peer review comments and CB responses which shall be readily available, including for evaluation by ASI.
11 Requirements for certified organisation certificates

11.1 The CB shall provide the certified organisation with formal certification documentation.

11.2 The formal certification documentation shall clearly convey or permit identification of the following:
   a. SBP logo
   b. name and address of CB
   c. CB certificate number (from the SBP approval certificate)
   d. name and address of certified organisation
   e. full name and version of the SBP standards against which the certified organisation has been assessed in the format: ‘SBP Standard 1, Feedstock Requirements, Version 1.0, 26 March 2015’ (as appropriate)
   f. reference to the suite of SBP documentation in the format: ‘The Sustainable Biomass Program Framework of standards can be found at: https://sbp-cert.org/’
   g. approval standards against which the CB’s evaluation was conducted, including their date of publication, for example, ‘The evaluation was conducted in accordance with SBP Standard 3, Certification Systems. Requirements for Certification Bodies, Version 1.0, 26 March 2015.’
   h. certification scope, for example, ‘Production of wood pellets, for use in energy production, at [name of pellet mill] and transportation to [name of port facility].’ Also indicate any standards which are not included in the certification scope, such as Standard 1 or Standard 5, for example, ‘The scope of this certificate does not include Supply Base Evaluation/Collection and Communication of Data.’
   i. certificate number in the format: ‘SBP-XX-YY’, where: SBP does not change; XX - is a 2 digit number allocated to the CB by SBP; and YY- is a unique 2 digit integer specific to the client. Note: the CB may add additional ‘0’ (zero) values in front of the ‘XX’ and ‘YY’ values where this facilitates integration with existing data systems
   j. certificate version number in the format: ‘XX’, where: XX is a 2 digit sequential integer
   k. date of issue of certificate
   l. date of expiry of certificate, and
   m. CB signature, either company name or individual according to house style.

11.3 If not using the default certificate layout provided on the SBP website, the CB shall seek approval by SBP in writing before using its own certification documentation template.

11.4 Any changes made to the format or layout of the certificate template following initial approval by SBP shall be approved in writing by SBP before use by the CB.
11.5 Formal certification documentation shall only be issued after the following:
   a. the decision to grant or extend the scope of certification has been made
   b. certification requirements have been fulfilled
   c. the client contract has been completed/signed per 2

11.6 The CB shall ensure that SBP is informed of all information listed in 11.2 prior to issuing a certificate.

11.7 In the event of any changes to the certification, including changes to scope or if the CB suspends or withdraws a certificate, the CB shall ensure that SBP is informed of the changes within three (3) business days of the change in certification.

11.8 The CB shall issue a letter of notification to companies whose certificate has expired, or has been terminated, suspended or withdrawn. The notification letter shall include:
   a. a clear statement about the invalid status of the certificate (expired, suspended, withdrawn or terminated)
   b. the official date from which the certification becomes invalid
   c. the rationale for invalidating the certification which shall include, but is not limited to, an explanation for any breach of the certification contract and the nature of the relevant non-conformance with SBP certification standard(s) (including name, version number and date)
   d. in case of expired certification, or certification having been terminated voluntarily, a reference to the voluntary decision of the company or the agreement between the company and the CB
   e. a requirement to refrain from using any and all SBP trademarks
   f. a statement requiring the company to provide acknowledge in writing of receipt of the letter of notification, its acceptance of its conditions and that it understands the invalidation of its certification.

11.9 The CB shall keep records of all letters of notification sent to companies and any letters received in response, acknowledging receipt and understanding of the conditions for 11.8 f.

11.10 Where a CB issues a SBP certificate to a new client at any time after the withdrawal or termination of the client’s previous certificate with another CB, and the re-evaluation is conducted within twelve (12) months from the expiry or termination of the previous certificate, the new CB shall consider any major or minor non-conformities which had not been closed at the time of withdrawal or termination.
12 General requirements for surveillance audits

12.1 The CB shall carry out a surveillance audit to monitor the client’s continued conformance with applicable certification requirements, at least annually (i.e. every 12 months). To ensure credibility of the certification, the CB shall have the contractual right to conduct additional surveillance audits more frequently, depending on factors such as:

a. the scale of the operation (e.g., the area of the SB, the quantity of material manufactured, or the value and/or volume of material traded)
b. the intensity of resource management in the case of a SB (e.g., the frequency and level of timber harvesting)
c. the complexity of the CoC control system
d. the ecological sensitivity of the SB to management intervention
e. the experience and performance record of the personnel involved (e.g., managers, staff, contractors)
f. the number and nature of any non-conformances identified by the CB
g. the number and nature of any complaints submitted by stakeholders
h. changes to the supply base, operations, management and/or subcontractors since the previous audit.

12.2 Surveillance evaluations shall follow clear, documented procedures which address the elements specified in this standard, and shall include in particular:

a. evaluation of the client’s conformance with all conditions and subsequent corrective actions, on which certification is based
b. review of any complaints or allegations of non-conformance with any aspect of the applicable SBP standards
c. evaluation of an adequate and appropriate sample of sites and records, and interviews with a sufficient number of affected stakeholders, in order to verify that management systems (documented or undocumented) are working effectively and consistently, under the full range of conditions present in the area under evaluation.

12.3 During annual surveillance audits, the CB shall cover the whole scope of the certificate, i.e. the applicable SBP standards.

12.4 The CB shall review at a minimum:

a. changes to the client’s management system
b. records of complaints and resolution procedures
c. training records
d. use of the SBP trademarks (in transport and delivery documentation and promotional materials).
12.5 Documentation and records covering the period since the previous evaluation may be submitted to the CB for review, prior to a site visit.

Standard 1 and/or 2 Surveillance

12.6 For certificates with a duration of five years, at least four on-site surveillance audits shall take place before the certificate expires.

12.7 The CB shall review at a minimum:
   a. any changes to the area included in the scope of the SBE, including additions, exclusions, or SB area changes
   b. operational plan(s) for the next 12 months
   c. feedstock supply records
   d. records of sales of SBP-certified products (copies of invoices, bills, shipping documents)
   e. records of the Risk Assessment (RA), Supplier Verification Program (SVP) and monitoring carried out
   f. records of any mitigation measures and their subsequent monitoring

12.8 The CB shall specifically assess the capacity of the client’s management system to manage any change in scope of the certificate, including any increase in the number of suppliers, and in the size, number or complexity of the SB within the scope of the certificate.
Standard 4, 5, and 6 surveillance

12.9 For a certificate that has a five-year duration, at least four surveillance audits shall take place before the certificate expires.

12.10 The auditor(s) shall visit the physical site(s) of each operation selected for evaluation to observe the applicable CoC system, unless the conditions for a remote audit are met. This is to verify that there has been conformance with the requirements of the specific SBP certification standard(s) under evaluation at that site.

12.11 The CB shall review at a minimum:
   a. any changes to the scope of the certificate, including new CoC procedures, operations and changes in activities
   b. inventory records
   c. purchasing and sales documentation for feedstock and biomass (invoices, bills, transport documents, sales contracts)
   d. confirmation that inputs described as SBP-certified were covered by a valid SBP CoC certificate and supplied with the corresponding certification codes
   e. calculations of credits and/or input percentages for each product group within the scope of the certificate
   f. a sample of records of certified outputs, and confirmation that these can be traced to certified inputs

12.12 The CB shall check at least the following with regards to mass balance systems:
   a. list of all inputs per site, including description of materials and details of all suppliers.
   b. list of all outputs per site, including description of materials and details of all customers.
   c. conversion factors applied (especially in the case of processing residues to ensure that the process is not being modified to produce more waste or residue material).
   d. inputs, outputs and balances carried forward shall be in balance and shall be audited and checked against the bookkeeping system.

12.13 Inputs and outputs shall be accompanied, where relevant, by a set of sustainability characteristics. Auditors shall verify that sustainability characteristics have been allocated appropriately. At the end of the mass balance period, the sustainability data carried forward shall be equivalent to the physical stock.
Remote audits

12.14 Remote audits may be carried out, without the need for on-site visits, for operations that do not take physical possession of SBP-certified materials or products in their own or rented facilities, and do not label, alter, store or re-package the products (e.g., sales offices or agents).

Remote audits are only applicable for SBP Standards 4, 5 and 6 audits, not for audits of Standards 1 and 2.

Remote and waived surveillance audits

12.15 The CB shall have a procedure for determining whether a surveillance audit against standard 4, 5 and/or 6 is conducted remotely or conducted on site.

Surveillance audits may be remote audits and may have reduced auditing time for operations that have not produced, labelled or sold any biomass with a SBP-claim since the previous audit.

12.16 Waiving surveillance audits

12.16.1 In case that no biomass has been produced, labelled or sold with a SBP-claim since the last audit, the CB may waive a surveillance audit.

12.16.2 To waive a surveillance audit, the CB shall require a signed declaration from the certificate holder that no biomass has been produced, labelled or sold with a SBP-claim since the last audit. The declaration shall contain a commitment by the client to contact the CB before commencing the production, labelling or sale of material with a SBP-claim. The declaration shall also contain a commitment to maintaining the client’s CoC system during the period in question.

12.16.3 The CB shall retain the contractual right to conduct a surveillance even when the certificate holder submits a declaration described in 13.16.2.

12.17 During the next surveillance audit, the CB shall review all records dating back to the previous on-site audit, to ensure that the CoC system has been maintained, and that no biomass has been produced, labelled or sold with a SBP-claim.

12.18 CBs shall not waive more than two consecutive surveillance audits.
13 Termination, reduction, suspension or withdrawal of certification

13.1 The CB shall assign one or more persons who were independent of the audit to decide whether to continue, suspend or withdraw certification based on their review of surveillance activities.

13.2 If the CB suspends, terminates or withdraws a certificate, it shall promptly (and in any event within three (3) business days of the suspension or withdrawal or termination) notify SBP in writing of the same and such notification shall state the action taken and the effective date and reason of suspension or withdrawal or termination.

13.3 The CB has the duty of seeking a timely resolution of complaints and appeals, in particular to:
   a. acknowledge receipt of a complaint or appeal
   b. provide an initial response, including an outline of the CB's proposed course of action to follow up on the complaint or appeal, within two (2) weeks of receiving a complaint or appeal
   c. keep the complainant(s)/appellant(s) informed of progress in evaluating the complaint/appeal
   d. investigate the allegations and specify all its proposed actions in conclusion to the complaint or appeal within three (3) months of receiving the complaint or appeal
   e. notify the complainant when the complaint is considered to be closed, meaning that the CB has gathered and verified all necessary information, investigated the allegations, taken a decision on the complaint and responded to the complainant.
Annex

1 Certificate Transfers

General requirements of the transfer process

1.1 A SBP certificate cannot be transferred under the following circumstances:
   a. if the SBP certificate has been transferred previously within the five (5) year period of the certificate’s validity, unless a full SBP evaluation audit is undertaken
   b. the SBP certificate is suspended
   c. all parties (new CB, previous CB, Certificate Holder) are unable to agree a transfer date
   d. there are outstanding major non-conformities against the Certificate Holder - these must be closed to the satisfaction of the previous CB before the transfer process may continue
   e. all relevant documentation about the Certificate Holder (records, history of CARs) is not made available to the new CB.

1.2 A Certificate Holder (CH) may request to transfer their certificate to a new CB. In such cases, the following process shall be applied:
   a. the CH informs their current CB that they are applying for a certificate transfer to a new CB
   b. the CH contacts the new CB and completes the application process for that CB.

1.3 The new CB shall request from the previous CB all relevant documentation about the Certificate Holder (including history of non-conformities), including all outcomes from any ASI surveillance assessment or compliance assessments regarding conformance of the CH to certification requirements.

1.4 The CH’s previous CB shall send a record of non-conformities to the new CB within two (2) weeks of the request.

1.5 The new CB shall confirm there are no pending major non-conformities.

1.6 The new CB shall propose a transfer date to the previous CB and the CH, on which all rights and obligations shall be transferred. The previous CB shall not unreasonably reject the proposed transfer date.

1.7 The new CB shall inform SBP of all relevant information regarding the transfer, including transfer date.
1.8 The new CB shall conduct a transfer audit within three (3) months of the agreed transfer date according to the requirements for a surveillance audit. The evaluation shall include a review of all pending non-conformities which were issued by the previous CB.

NOTE: Certification Bodies will need to terminate / create Business Relationships in the DTS as appropriate.

Status of the SBP certificate

1.9 The period of validity of a SBP certificate shall not exceed five (5) years. As such, a transferred certificate shall retain the same expiry date as the previous certificate unless a full re-evaluation audit was conducted in conformance with .

1.10 The scope of the transferred SBP certificate shall be retained. Where a certificate holder requests a change or extension in scope this shall be evaluated by the new CB in line with the relevant requirements after the date of transfer.

1.11 All minor non-conformities that are applicable to the previous certificate shall remain applicable to the succeeding certificate, and shall be evaluated by the new CB according to the defined timelines.

Updates to the SBP website and SBP Data Transfer System (DTS)

1.12 The new CB shall undertake the following activities:
   a. ten (10) working days before the transfer date, the new CB shall submit to SBP an updated Certificate Holder Information form with the new Certificate Number for the transferred Certificate Holder and other updates as necessary.
   b. within three (3) days from the date of transfer the new CB shall send a copy of the new certificate to SBP.
   c. after the date of transfer the new CB shall check the SBP website entry for correctness and completeness.

Informative:

SBP shall undertake the following activities:
   a. on the date of transfer (or next available working day) the SBP website Certificate Information shall include the following changes, at minimum:
      • a change to the CB.
      • a change to the Certificate Number.
      • a reference to the previous Certificate Number.
      • a date of issue – which will be the agreed Transfer Date (to ensure that the five (5) year audit cycle is maintained).
   b. within three (3) days from the date of the transfer the DTS system will be updated with the new SBP Certificate code.